



Subcontracting Strategy

Version 2.0

Version Control

This policy is reviewed annually, or as changes in legislation dictate.

Name and Role of Author: Brian English, Managing Director

Name and Role of Responsible Person: Directors and SMT

Ratified by: Senior Management Team

Signed:

Date Ratified:

Document ID Number		SC001	
Business Area		Apprenticeships & Quality	
Used by		All	
Version Status		Live Document	
Document Classification		Internal Use	
Version Number	Date	Expiry Date	Reason for Update
1	01/05/2025	01/05/2028	Subcontracting Strategy 2025/2028 issued.
2	On approval	01/05/2028	Updated for current DfE/DWP subcontracting rules (ESFA closure, ROATP to APAR, subcontracting standard, MYESF declarations and nil return). Adopted corporate template.

Uncontrolled if printed or downloaded

Contents

Overview of Policy	3
Regulatory Framework.....	3
Subcontracting Strategy and Rationale.....	3
Subcontracting Priorities for 2025/2028	5
Registration, Thresholds and First-Time Approval	5
Subcontractor Declarations and External Audit	6
Partner Provision and Management Policy	6
Fees and Payments	7
Support for Subcontractors.....	7
Teaching, Learning and Assessment	8
Communication and Management of the Policy	8
Publication of Policy	8
Subcontracting Contingency Plan 2025/2028	8



Overview of Policy

This policy, which is refreshed annually, details MediPro's strategy for subcontracting and management arrangements. The reviewed policy, including the rationale for subcontracting, is signed off by those charged with governance and published on MediPro's website by 31 October each year.

Current position: MediPro has not procured or delivered any subcontracted provision for over two years. All apprenticeship and funded provision is currently delivered in-house, either face to face or virtually. MediPro submits a nil return at each subcontractor declaration deadline to confirm this.

This strategy is retained so that, should MediPro choose to reactivate subcontracting, a compliant and up-to-date framework is already in place.



Regulatory Framework

This policy reflects the current subcontracting requirements published by the Department for Education (DfE) and the wider machinery-of-government changes affecting apprenticeships.

Key changes since the previous version of this strategy:

- The Education and Skills Funding Agency (ESFA) has closed. Its funding functions have transferred into the DfE.
- Responsibility for apprenticeships has transferred from the DfE to the Department for Work and Pensions (DWP) under a 2026 machinery-of-government change. The current Apprenticeship funding rules are issued jointly under DfE/DWP.
- The Register of Apprenticeship Training Providers (ROATP) has been replaced by the Apprenticeship Provider and Assessment Register (APAR), which includes a dedicated 'supporting provider' route for subcontractors.

MediPro operates within the following documents, as amended from time to time:

- Apprenticeship funding rules (DfE/DWP), current funding year.
- Subcontracting funding rules for post-16 education and training (DfE).
- The DfE subcontracting standard.
- The DfE policy on funding higher-risk organisations and subcontractors.
- The DfE financial health assessment guidance.

Note on future changes: the DfE has confirmed a full review of the apprenticeship subcontracting rules across summer 2026, concluding around September 2026, with changes taking effect from 2027. A proposed reduction of the APAR de minimis threshold from £100,000 to £25,000 was stepped back pending this review. MediPro will update this policy on conclusion of the review.



Subcontracting Strategy and Rationale

MediPro's Strategic Plan details the five priorities:

1. Create an excellent learning and teaching environment.

2. Cultivate a dynamic learning organisation where students develop knowledge and skills to achieve qualifications valued by industry.
3. Instilling an energy for our staff to succeed and celebrating success.
4. Leading as a business that is a promoter for governance, financial control and balanced risk taking.
5. Enhance our position as the education provider of choice across our community.

MediPro is committed to delivering high-quality apprenticeships that exceed the expectations of our apprentices and employers. Where possible, the MediPro apprenticeships team will deliver all parts of the programme, either face to face or virtually, without the use of subcontractors.

MediPro currently offers advanced and higher-level apprenticeship standards nationwide, tailored to meet the specific needs of various clinical settings. We specialise in, but are not limited to, the following areas:

1. Patient Transport Services
2. Emergency and Urgent Care Ambulance Support Worker
3. Associate Ambulance Practitioner
4. Dental Nurse
5. Pharmacy Technician
6. Adult Care Worker
7. Health Care Assistant

Subcontracting Rationale. MediPro will only consider a subcontractor arrangement where there is a need to employ specialist knowledge and skills to support the delivery of our apprenticeship programmes. The decision must not be motivated by financial gain and must enhance the quality of the learner offer. In line with the DfE subcontracting funding rules, the educational rationale must meet one or more of the following aims:

- Enhance the opportunities available to learners.
- Fill gaps in niche or expert provision, or provide better access to facilities.
- Support better geographical access for learners.
- Support an entry point for disadvantaged groups.
- Support individuals who share protected characteristics, where there might otherwise be gaps.

In addition, one or more of the following must apply, where another organisation can provide:

- Training linked to specific employer demand.
- Where the use of the subcontractor will enhance the apprentices' experience through specific expert provision.
- Where it is a contractual requirement with the employer that part of the delivery of the apprenticeship is subcontracted to them.
- To support larger volumes of learners than MediPro is able to reach, to deliver a niche component of the apprenticeship, particularly for example "Emergency Response Ambulance Driving".
- Specialist resources or expertise not available at MediPro.
- Opportunities to expand MediPro's offer into new markets.
- A flexible learning model for those who are unable or unwilling to attend MediPro's training academy.

Through subcontracting, MediPro aims to support the following priorities:

- Driving local and regional economic growth.

- Ensuring exceptional achievement, progression and destination of learners.
- Supporting financial resilience.



Subcontracting Priorities for 2025/2028

MediPro intends to work with:

- Partners who can deliver specialist training to underpin MediPro's delivery.
- Partners who can provide strategic opportunities to support the development of Apprenticeship Standard programmes.
- Partners who provide added value to MediPro's academic and commercial success.

MediPro will only enter a subcontracting relationship with a subcontractor for apprenticeship provision where they are eligible to receive apprenticeship funding, as outlined in the Apprenticeship funding rules. All subcontractors have a contractual relationship with MediPro and are required to undergo rigorous quality assurance processes and remain compliant with the Apprenticeship funding rules.

Subcontracting Management Fees. MediPro does not charge a management fee when subcontracting apprenticeship training provision.

In all cases, the decision to subcontract will be discussed and agreed with partners before entering any subcontract arrangement and will be recorded in the Service Level Agreement and Contract. Subcontractor arrangements will apply to programmes funded under apprenticeships only, and where identified as appropriate to support delivery of the strategic aims of this policy.



Registration, Thresholds and First-Time Approval

Register requirement. A subcontractor delivering apprenticeship training must be listed on APAR (as a main or supporting provider) unless an exemption applies. Any subcontractor must hold a valid UK Provider Reference Number (UKPRN) via the UK Register of Learning Providers (UKRLP) and be recorded as 'active' at Companies House where it is a registered company.

De minimis exemption. A subcontractor that is not on APAR may only deliver where it will deliver less than the published de minimis threshold of apprenticeship training in the funding year, holds a current UKPRN, and has not engaged the funding higher-risk organisations policy.

No second-tier subcontracting. All subcontractors must contract directly with MediPro. MediPro will not permit a subcontractor to further subcontract MediPro's provision, and will not enter any brokerage arrangement.

First-time / resumption approval. Because MediPro has not subcontracted provision for over two years, MediPro will seek the DfE's written approval before awarding any new subcontract, in line with the guidance on subcontracting post-16 education and training for the first time, and will retain evidence of the request and the response.

25% learner threshold. For adult skills fund and 16 to 19 funded provision, an exemption case must be submitted to the DfE by 30 April where subcontracting would exceed 25% of learners in a funding stream. This is not currently applicable to MediPro.



Subcontractor Declarations and External Audit

MediPro returns Individualised Learner Record (ILR) data and therefore submits a subcontractor declaration twice each academic year through the Manage your education and skills funding (MYESF) service. As MediPro does not currently subcontract, a nil return is submitted at each deadline.

Declaration	Deadline	Requirement
First declaration	31 October	Forecast subcontracting arrangements for the funding year. MediPro submits a nil return.
Second declaration	30 June	Confirmation of total subcontracting arrangements for the funding year. MediPro submits a nil return.
Subcontracting standard	31 August	External auditor's report required only where aggregate subcontracted delivery exceeds £100,000 in a funding year. Not currently applicable to MediPro.

For the purposes of calculating the £100,000 aggregate total that triggers the subcontracting standard, apprenticeship delivery is included. Where the standard applies, the external auditor's final report, action plan and assurance declaration are submitted via Document exchange by 31 August.



Partner Provision and Management Policy

MediPro has robust partnership selection and management processes in place, which are subject to internal audit. Where future subcontracting is required, MediPro is committed to obtaining an External Audit Certificate of Assurance for Subcontracting to ensure compliance and uphold quality standards.

MediPro aims to work with a minimal number of partners on a subcontracted basis to deliver high-quality training and education against its key priorities. MediPro's main aim is to increase the impact on local communities through extended reach and investing in local community partners.

Any subcontractor must pass a detailed due diligence process, reviewed at least annually, which includes but is not limited to:

- Confirmation the organisation is not high-risk under the DfE funding higher-risk organisations and subcontractors policy.
- Listing on APAR as a main or supporting provider (or eligibility under the de minimis exemption), and a valid UKPRN via UKRLP.
- Review of previous Ofsted appraisal, or applicable assurance reports.
- Evidence of financial viability, assessed using the DfE financial health assessment.
- Confirmation the organisation is 'active' at Companies House, with no winding-up, liquidation, administration or overdue accounts, and consideration of its credit rating.
- The business's legal status, and checks for current or past litigation.
- Review of current safeguarding, welfare and Prevent provision.
- Review of the capacity to deliver training and team competence.
- Review of required policies and procedures.

- Agreement that the subcontractor will not subcontract any of MediPro's training.
- Learners are aware of being on a MediPro apprenticeship programme.
- Employers are aware of, and agree to, MediPro being the training provider.

By collaborating with our trusted subcontracting partners, MediPro is able to enhance its understanding of diverse sectors and communities across the healthcare landscape. These partnerships enable us to share and adopt best practices, enrich our training delivery, and ensure our programmes remain responsive, inclusive, and aligned with the evolving needs of employers and learners alike. This collaborative approach strengthens our capacity to deliver high-quality, sector-relevant apprenticeship provision nationwide.

MediPro will notify the DfE of any circumstance that might create an actual or perceived conflict of interest, and will not award a contract in such cases without written permission. Where MediPro is a contracting authority under the Procurement Act 2023, it will comply with the Act when selecting and awarding delivery.



Fees and Payments

MediPro is committed to high-quality teaching and learning, and the proportion of the fees retained reflects this and is reasonable to cover MediPro's own costs to deliver the services provided.

MediPro will pass on an agreed amount of funding for the actual cost of the subcontracted delivery elements of the apprenticeship standard. No further amount will be taken as a management fee. MediPro will monitor the subcontractor activity and provide support to the subcontractor.

Payments to subcontractors. Following the validation of evidence submitted in the ILR return, MediPro will process monthly or quarterly payments to subcontracting partners, as agreed. Payments will be made upon receipt of a valid invoice and will cover the agreed delivery period, excluding a 20% completion value, which will be retained until the successful completion of the programme. Any necessary adjustments will be reconciled and paid accordingly.

Completion payments retained will be released to the subcontractor following the receipt of evidence of the learner's completion.



Support for Subcontractors

The exact mix and level of support for each subcontractor will be assessed initially as part of the due diligence process, prior to contracting, and thereafter on an annual basis.

For new subcontractors, monthly reviews will be conducted by MediPro and the subcontractor to identify any day-to-day operational and administrative issues. All subcontractors will be subject to regular review.

Other areas of MediPro's support include input and guidance on the following:

- Support with due diligence.
- Establishing and maintaining quality management systems.
- Certification and registration with awarding bodies.
- Audit of management systems.

- Support and audit of learner paperwork.
- Curriculum, Observation of Teaching and Learning and Quality support.
- Training and development.



Teaching, Learning and Assessment

MediPro is committed to improving the quality of teaching and learning and, along with partnership review meetings, the additional quality checks include:

- Initial Quality and Curriculum Visit.
- Partner training events on developing and embedding good consistent practice, safeguarding, reviews and PREVENT.
- Any actions will be highlighted in the partner review meetings.
- Self-Assessment: support with the completion of the annual SAR.
- Review of tracking and predicted achievement rates.



Communication and Management of the Policy

MediPro will share in writing its subcontracting policy, discuss funds, and set out details of the paperwork processes and partnership procedures for the academic year with all potential partners at the start of the year.

The Education Planning Lead manages the business and day-to-day relationship with subcontractors.



Publication of Policy

This policy is published on MediPro's website and issued to all partner organisations.



Subcontracting Contingency Plan 2025/2028

In the event that MediPro needs to withdraw from a subcontracting arrangement, a subcontractor chooses to exit the agreement, or a subcontractor enters liquidation or administration, MediPro will implement measures to ensure continuity of learning provision. These steps will prioritise the safeguarding of learners, ensuring they are supported to complete their qualifications with minimal disruption. A comprehensive contingency plan for subcontracted provision is reviewed and updated annually.

As MediPro currently holds no subcontracting arrangements, there is no active contingency requirement. This position is reviewed at each declaration deadline.