STL SCITT Subcontracting Policy (Apprenticeships - River Learning Trust)

1. Purpose

This policy sets out how River Learning Trust ("the SCITT") manages subcontracted delivery of apprenticeship training to ensure compliance with Department for Education (DfE) and funding body requirements. The SCITT is committed to maintaining full accountability for the quality, delivery, and compliance of all apprenticeship programmes.

2. Definition of subcontracting, and rationale

For the purposes of this policy, subcontracting is defined in line with apprenticeship funding rules as:

> Delivery of apprenticeship training or on-programme learning by a separate legal entity under an arrangement with the SCITT.

This includes arrangements where a separate organisation delivers any element of the apprenticeship programme under contract, service agreement, or similar arrangement, whether delivered on-site or remotely.

Subcontracted delivery may be required for the delivery of subject-specific learning for the Postgraduate Teaching Level 6 Apprenticeship. Subcontracted delivery is utilised to enhance opportunities for learners, by providing expert provision. This is in order to ensure that learners benefit from expert provision, related to subject-specific learning.

3. SCITT responsibility

The SCITT retains full responsibility for:

- curriculum design and sequencing
- delivery planning and oversight
- quality assurance and monitoring
- assessment against the Teachers' Standards
- recommendation for Qualified Teacher Status (QTS)
- compliance with apprenticeship funding rules and funding claims

Engagement of external individuals or organisations does not transfer overall responsibility for apprenticeship delivery.

4. External delivery and specialist input

The SCITT may engage external subject specialists, delivery partners to contribute to apprenticeship delivery. This may include individuals who:

- are employed by schools or other organisations
- are self-employed or freelance
- deliver discrete sessions, workshops, or specialist input

Where such individuals are engaged via their employing organisation and that organisation invoices the SCITT, this arrangement is treated as delivery provided by a separate legal entity.

5. Subcontracting arrangements

Where delivery is provided by a separate legal entity, the SCITT will ensure that subcontracting controls are applied, including:

- a written subcontracting agreement in place prior to delivery
- verification that the organisation holds a valid UKPRN

- completion of due diligence checks prior to engagement
- clear definition of roles, responsibilities, and scope of delivery
- retention of SCITT responsibility for curriculum, QA, and assessment
- ongoing monitoring and quality assurance of delivery
- accurate recording and declaration of subcontracting in line with funding requirements, including MYESF submissions

6. Risk-based application of subcontracting controls

To ensure compliance with funding rules and audit requirements, the SCITT adopts a precautionary approach. Where delivery is provided by a separate legal entity, subcontracting controls will be applied unless the arrangement is formally confirmed as outside the scope of subcontracting by the funding body. This approach ensures consistent compliance with audit expectations and funding rule interpretation.

7. Quality assurance

All externally contributed delivery, whether subcontracted or commissioned, is subject to SCITT quality assurance processes, including:

- observation and review of delivery
- AT feedback and evaluation
- monitoring of progress and outcomes
- alignment with programme requirements (ITTECF) and Teachers' Standards
- due diligence checks on subcontractors and employers, such as Ofsted reports

8. Compliance and declarations

The SCITT will comply with all apprenticeship funding rule requirements relating to subcontracting, including:

- maintenance of accurate records of delivery arrangements
- submission of subcontracting declarations where required
- transparency of financial and delivery arrangements
- adherence to funding body audit requirements

9. Review

This policy will be reviewed annually or sooner if changes occur in apprenticeship funding rules, audit requirements, or delivery structures. Review and agreement is undertaken by the Deputy Directors, Director, Trust Accountable Officer and Governing Body, as required.

Dated: 01/09/2026