

Bellevue Education International Ltd.
Subcontracting Policy for Apprenticeship Provision

This Policy Applies to Bellevue Education International Ltd.

BELLEVUE APPRENTICESHIPS

Reviewed July 2026
by
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Next Review - July 2027

Purpose

This policy outlines the principles and procedures Bellevue Education International Ltd. (BEI Ltd) adheres to when subcontracting the delivery of apprenticeship training and/or on-programme assessment. The purpose is to ensure compliance with the Department for Work and Pensions (DWP) funding rules, deliver high-quality learning, and ensure that subcontracting adds value to our apprenticeship provision.

Scope

This policy applies to all subcontracting arrangements entered into by BEI Ltd for apprenticeship training funded by the DWP. It governs all stages of subcontractor engagement, including selection, monitoring, quality assurance, and termination of contracts.

Policy Objectives

1. Compliance with DWP Rules

Ensure all subcontracting arrangements meet DWP funding rules, including the use of funds, subcontractor eligibility, and reporting requirements.

2. Value Addition

Only subcontract where it enhances the quality of provision, supports access to specialist expertise, or increases capacity to meet employer demand.

3. Transparency and Accountability

Maintain transparency in procurement, contracting, and financial arrangements, ensuring public funds are used appropriately.

4. Quality Assurance

Guarantee the delivery of high-quality training and assessment that aligns with BEI Ltd's standards and DWP expectations.

5. Fair and Ethical Practices

Ensure subcontractors are treated fairly, contracts are clear and reasonable, and relationships are free from conflicts of interest.

Key Requirements

1. Rationale for Subcontracting

BEI Ltd may subcontract when:

- Specialist training or expertise is required that BEI Ltd cannot provide directly.
- There is a need to address regional or demographic gaps in provision.
- Employers or apprentices require access to niche or industry-specific training. BEI Ltd does not subcontract solely for financial gain or to meet short-term funding targets.

2. Selection and Due Diligence

BEI Ltd will conduct thorough due diligence on potential subcontractors, ensuring they:

- Are financially stable and meet DWP requirements.
- Have appropriate experience, capacity, and expertise in delivering apprenticeship training.
- Comply with statutory safeguarding and Prevent duties.
- Operate ethical practices, including robust quality assurance and equality policies.
- Require evidence that subcontractor staff working directly with apprentices hold appropriate DBS checks in line with BEI Ltd's safeguarding policy.
- Complete and retain a conflict-of-interest declaration for each subcontracting arrangement, confirming there is no shared ownership, staffing, or financial relationship between BEI Ltd and the subcontractor that has not been disclosed and managed.
- Due diligence findings and subcontractor approval will be signed off by a named senior lead within BEI Ltd's Apprenticeship Leadership Team before any contract is issued.

3. Contractual Requirements

A formal, written agreement will be in place for all subcontracting arrangements, including:

- Clear roles, responsibilities, and obligations.
- Payment terms and conditions, including funding retained by BEI Ltd for quality assurance and management.
- Provisions for monitoring, audit, and quality assurance.
- Processes for resolving disputes and terminating the contract.
- Compliance with DWP funding rules and data protection requirements.

4. Quality Assurance

BEI Ltd will monitor subcontractors through:

- Quality assurance of courses
- Gathering employer and apprentice feedback.
- Ensuring teaching, learning, and assessment align with apprenticeship standards.
- Reviewing performance data and learner outcomes.
- Provide apprentices and employers with a clear route to raise concerns or complaints about a subcontractor's delivery, in line with BEI Ltd's Quality Assurance Policy complaints and appeals procedure.

5. Payment and Financial Management

BEI Ltd will:

- Retain a management fee, disclosed transparently in the subcontracting agreement.
- Pay subcontractors promptly upon receipt of accurate invoices and evidence of

- delivery.
- Ensure that public funds are used for their intended purpose, providing value for money.

6. Reporting and Declaration

BEI Ltd will:

- Declare all subcontracting arrangements in the DWP Subcontractor Declaration Form twice annually (by 31 October and 30 June), as required. Nil returns are mandatory if no subcontracting takes place.
- Publish details of subcontractors and associated fees on its website annually.

7. Termination of Contracts

BEI Ltd reserves the right to terminate subcontracting arrangements if:

- Performance or quality issues arise that cannot be resolved.
- The subcontractor breaches contractual terms or DWP funding rules.

Review and Approval

This policy will be reviewed annually or when changes to DWP funding rules require an update. The policy is approved by BEI Ltd's senior leadership team.

Regulatory Compliance Note

Note: As of July 2026, the 2026/27 apprenticeship funding rules contain significant updates to subcontracting. This policy must be verified and updated in line with the final ratified 2026/27 DWP funding rules.

Approved by:

[Name]

[Position]

[Date]