



Apprenticeship Subcontracting - Fees & Charges Policy 2025/2026

Scope

This policy applies to all subcontracting activity supported with funds supplied by the Department for Education (DfE). The policy sets out the supply chain fees and charges and aims to ensure transparency around subcontracting and the associated retained fees.

The University recognises that it holds full accountability for the delivery of subcontracted activity and that this cannot be assigned to subcontractors.

It is the responsibility of both the University as the training provider (and where relevant Employer Provider) and their subcontractors to refer to the rules and guidance of the DfE and any future updates in all matters regarding the delivery of the subcontract.

Context

The University will at all times undertake fair and transparent procurement activities (<https://www.brookes.ac.uk/fls/procurement/>), conducting robust due diligence procedures on potential and existing subcontractors to ensure the highest quality of learning delivery is made available, whilst demonstrating value for money.

Subcontracting must meet the requirements in the relevant DfE funding guidance and policy documents.

Rationale for subcontracting

The University engages with subcontractors in order to enhance the opportunities available for learners and fill gaps in niche or expert provision.

Responsibilities

This policy is owned by the Head of UK Partnerships and Apprenticeships. The Apprenticeship Oversight Group is responsible for approval of this Apprenticeship Subcontracting Fees and Charges Policy. The management of subcontracted provision is provided through the Contracts and Compliance Manager, Apprenticeships Team and relevant Faculty teams.

Subcontracting Partners

1. Runway Training for Functional Skills Qualification provision across all programmes
2. Oxford Health NHS Foundation Trust for co-delivery of skills teaching within practice modules on the Nursing Associate Apprenticeship

Subcontractor Management Fees

The University will retain a management fee where appropriate which will cover a proportion of the direct costs associated with operating and quality assuring sub-contracted provision and provides a contribution towards indirect costs such as legal, finance, student support, IT and other curriculum support costs.

The management fee will be determined for each subcontract on a case by case basis and will reflect actual costs incurred by the University. All fees will be calculated in accordance with the Apprenticeship Funding rules.

The management fee will not exceed 10% of the contract value and will cover the following costs incurred by the University:

- Preparation of all subcontract documentation and processes, including due diligence
- Funding guidance and support relating to eligibility of learners and provision
- Preparation of funding submissions
- Authorisation of payments
- Subcontract management
- Quality monitoring activities and review meetings
- Monitoring of learner progress
- Ensuring audit compliance

This list will be reviewed each year by the Contracts and Compliance Manager to determine whether it is reasonable and proportionate, and changes will be made if required.

Specific costs are included in the contract issued to each subcontractor and are discussed to ensure that the subcontractor agrees that the costs are reasonable and proportionate and understands how they contribute to delivering high quality learning.

The management fee is deducted from the funding income received prior to the allocation of funds to the subcontractor.

Subcontractor Monitoring

The University is committed to delivering high quality teaching and learning across its provision and will work with subcontractors to review progress and manage the quality of externally delivered provision

A record of quality and monitoring activities will be kept and may be provided as evidence to an Employer, the DfE or its delegated authority at financial assurance review.

Payment Terms

The University will make payment to subcontractors retrospectively and within 30 days of the receipt of an invoice which incorporates a valid claim for payment in line with the schedule set out in the subcontract.

Communication of the Subcontractor Fees & Charges Policy

The Subcontractor Fees & Charges Policy is published on the [University's website](#) annually by 31st October and linked in all subcontracts. The policy will be discussed with potential subcontractors during the due diligence process.

Reporting

The Apprenticeship Oversight Group have oversight of subcontracted activity via a subcontracting report on a quarterly basis, with a year-end review presented alongside an updated version of this policy.

Policy Review

This policy will be reviewed and updated annually. Any changes to the policy will be communicated to existing subcontractors at the contract management meetings.

Date first published: October 2019

Approved: 25/09/25

Next review date: September 2026

Version: 7