Subcontracting Policy

Document Control	
Document Type:	Policy
Department:	Business Improvement
Relevancy:	Total People
Author/Owner:	Andrew Yates
Approver:	Total People Board & Managing Director
Published Date:	19/10/2026
Version:	v1.1
Security Classification:	Internal & External
Last Review Date:	06/10/2026
Next Review Date:	31/08/2026

Background

Total People Limited is required by the Department for Education (DfE) to provide the following information in relation to subcontracted activity.

Total People will, as requested by the DfE, declare the amount of subcontracted provision undertaken, provide a declaration of the individual providers whom Total People subcontract with, this information is updated & published on the Total People website on a yearly basis, additionally, ensuring that Total People are within the guidelines set by the DfE with regards to having plans to have a cap on subcontracting of up to a maximum of 25% per funding stream, Total People have adhered to this requirement since it came into effect and will continue to do so.

Total People are committed to delivering exceptional standards of learning and to provide a broad offer of learning opportunities and choice to all learners. To support this, we may enter into subcontracted delivery arrangements with a number of organisations to provide specialised & niche education routes which supplement Total People's current catalogue of educational provision, where subcontractors are selected they are done so with a plan of longevity to ensure there is continued availability for specialised provision to be offered, to support this, prior to entering a subcontract, Total People conduct stringent checks that are dependent upon the subcontractor being able to ensure that:

- there is a broad offer of learning and choice which supplements and underpins our direct delivery to enhance the number of opportunities available.
- all learners receive exceptional standards of learning.
- we will support raising of the standard of learning and quality of teaching for providers who enter a contract of provision with us.

Total People will, on an on-going basis, aim to improve the quality of any subcontractor and partner arrangements, this will be evidenced by:

- pre-contract activity which assesses the capability, capacity and readiness of the subcontractor to deliver the proposed learning.
- contract reviews which are undertaken on a regular basis, dependent on risk, which encompass the quality of provision delivered, learner progress, teaching and learning and contract performance.
- advising on the quality of provision and ways to improve working between Total People and the subcontractor.

Fees

Total People retain a fee for subcontracting which varies dependent upon the level of support required and provided to each subcontractor. These fees are reviewed regularly and are adjusted as appropriate.

Total People typically retain up to 20% of the DfE funding it receives against each learner for subcontracted provision (typically fee breakdown at end of document policy), this is applied equally to both on programme and outcome payments, including completing the end point assessment (where applicable).

All fees reflect an actual cost of subcontractor management and aren't used to generate a financial profit for Total People, fees in both percentage of TNP and £ may vary dependant on price negotiations with the employer for the apprenticeship provision.

Support

Typically, a subcontractor with Total People will receive the following on a monthly *or* quarterly basis dependant on the needs of the subcontractor.

- Regular contract monitoring with agreed actions for improvement along with dates of when the improvements are to be completed by.
- A broad range of management information and performance reports to support the effective and timely delivery of DfE funded provision.
- Experienced staff as a point of call such as specialist data & funding teams, safeguarding champions, health & safety experts & direct support from contract managers.
- Invitations to Total People's yearly conference days which offer support & guidance on changes to funding rules & processes for provision funded by the DfE.
- Performance assessment of activities such as teaching, learning & assessment with detailed feedback on improvements identified and timescales for improvements to be implemented.
- Perform validation checks to ensure compliance with the funding rules outlined by the DfE (submission based).

If during contract monitoring it is identified that there are elements of non-compliance with regards to Department for Education's rules, regulations, guidelines and/*or* contractual agreements then support will be offered by Total People in order to assist with improving the subcontractor's processes, if non-compliance has not been addressed in the agreed timescales this will trigger the penalty clauses included in the contract which could ultimately lead to termination of the contract.

Procurement

Total People are committed to ensuring that where the business has identified a need to subcontract that all interested businesses are subject to an opportunity to bid for advertised tenders. Total People utilise LTE Groups' rigorous procurement process which adopts the below principles & also ensures that Total People adhere to all procurement requirements.

- Competitive tendering
- Sustainability
- Transparency
- Fairness & Equality
- Best practice
- Legality (e.g., in accordance with UK Procurement Regulations)
- Confidentiality, subject to the Freedom of Information Act
- Fitness for Purpose
- Quality
- Total Lifetime Costs
- Risk
- Environmental Impact

Due diligence

Total People undertake robust Due Diligence which includes a financial health assessment, safeguarding & prevent, quality, ability/expertise to deliver qualifications posed and ensuring that the organisation doesn't fund extremist organisations, this is to mitigate the risk to Total People and the contracts they may potentially let.

Further investigations of any subcontractor would be undertaken if any of the following is identified via monitoring or any other means:

- Ofsted has awarded the provider a Grade 3 or 4
- Any irregular financial or delivery activity arises such as credit ratings that move to 'above average risk'.
- Sanctions are placed on any subcontractor by the awarding organisation.
- Non-delivery of training
- Failure to meet the performance criteria detailed within the contract.

Payment terms between Total People and the subcontractor

The payment terms and evidence requirements are detailed within the appropriate subcontractor's contract; payments are released to subcontractors within 30 days of funding being paid to Total People from the DfE.

Payment processes are compliant with DfE contractual requirements and are made monthly in arrears and on an actual basis related to the ILR. This is providing that the subcontractor has submitted the appropriate evidence, ensuring that it is of the highest quality and meets the needs of the learner and Total People.

Total People provide a monthly claim summary to the subcontractor which sets out the payments for the previous month and details any amounts withheld typically where further evidence is required. Once Total People are satisfied with the quality of the subcontractor's provision for the month, the payment will be made to the subcontractor, based on the invoice raised to Total People submitted with a signed subcontractor declaration (provided as part of the claim summary).

Performance

In the event of the Subcontractor is no longer meeting the agreed delivery profile as detailed within the subcontract or fails to meet the latest published national minimum performance achievement rates, Total People reserve the right to re-profile the Subcontractor's delivery allocation and contract value pursuant to the contracts terms and conditions.

Total People will monitor each Subcontractor's actual starts and income performance versus the Subcontractor's contracted starts profile (outlined within the subcontract) and maximum contract value throughout the year as part of the contract monitoring arrangements. Where the Subcontractor does not achieve the profile set out within the subcontract, Total People will discuss and agree a new profile and maximum contract value.

Policy review

Total People will review the entirety of the subcontracting on an annual basis; the review of this policy will typically take place in October of each year as per the document control section. Dependant on advice or changes to the policy guidance set out by the Department for Education this policy may be updated on an ad-hoc basis throughout the year.

Background & Cost Breakdown

This document is tied to the subcontracting policy and is a requirement of the subcontracting funding rules for DfE post-16 funding (excluding apprenticeships), information detailed here is in

relation to the specific costs that Total People have agreed/retain as part of the agreement with the subcontractors named in this document.

Apprenticeship Provision

Subcontractor Management

Partner Name:	**LTE Group**	
Agency Contract Funding Stream:	**Apprenticeships**	
Total Contract Allocation:	**£500,000***	
Breakdown of Costs (*TNP 1*)	**Total People**	**LTE Group**
Initial assessment activities	4%	0%
Off The Job Training (Knowledge and Practical)	0%	19%
Off The Job Training (workplace visits, mentoring, assessments, shadowing, coaching, EPA prep)	30%	0%
Materials and Consumables	5%	5%
Progress Reviews	6%	0%
Programme Governance, Management & Administration	15%	9%
End Point Assessment	0%	0%
Surplus	6%	0%
Cost Responsibilities	66.66%	33.34%
Total People Subcontractor management fee rate	**12%**	

Partner Name:	**Peak Training**	
Agency Contract Funding Stream:	**Apprenticeships**	
Total Contract Allocation:	**£12,842.88**	
Breakdown of Costs (*TNP 1*)	**Total People**	**Peak**
Initial assessment activities	4%	0%
Off The Job Training (Knowledge and Practical)	7%	19%
Off The Job Training (workplace visits, mentoring, assessments, shadowing, coaching, EPA prep)	23%	7%
Materials and Consumables	5%	5%
Progress Reviews	6%	0%
Programme Governance, Management & Administration	15%	9%
End Point Assessment	0%	0%
Surplus	0%	0%
Cost Responsibilities	60%	40%
Total People Management Fee Rate	**0%****	

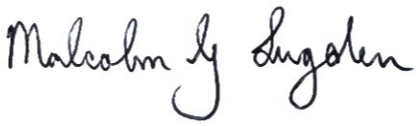
Supporting provider, due to limitations of APAR, this contract will not exceed £500,000 in any one contract year, threshold is cumulative.

****Different payment model due to utilisation of the business continuity plan.***

Signatures & Review:

This Policy will be published on Total People's internal Hub and external website, as well as included in the Training Plan (as a hyperlink to the website-published version) that is completed with employers at the start of programme.

This policy will be updated annually as a minimum.

	Name:	Postion:	Signature	Date
Approver:	Melanie Nicholson	Managing Director Total People		19th October 2026
Board Approver:	Malcolm Sugden	Chairman Total People Board		19th October 2026
Version:	**Version 1.1 – October 2026**			