Hampshire Hospitals NHS Foundation Trust

Apprenticeship Training Provider Subcontracting Policy

September 2026 | Version 3.0

Next review: September 2027



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What This Policy Covers

How Hampshire Hospitals NHS Foundation Trust (HHFT) manages apprenticeship subcontracting arrangements funded through the Growth and Skills Levy.

Policy Scope

All subcontracting activities undertaken by HHFT as an approved apprenticeship training provider and supports compliance with the current UK Government Apprenticeship Funding Rules and the delivery of high-quality apprenticeship provision.

Review Frequency

Annually in line with the Apprenticeship Funding Rules.

Publication

The latest version will be published on the Trust website[1] and shared with subcontractors.

Policy Authorisation



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Associate Director of Apprenticeships and Widening Participation

[1] https://hampshirehospitalscareers.co.uk/trainings/apprenticeships/1

1. What is a Subcontractor?

HHFT adopts the official definition determined in the current UK Government Apprenticeship Funding Rules[2].

For the purpose of this policy, a subcontractor is:

An organisation or individual who has a subcontracting agreement with HHFT to deliver approved apprenticeship services.

2. Why HHFT uses Subcontractors

HHFT only uses subcontracted services where they add value through expert provision, enhance opportunities, and or widen access to quality training.

HHFT uses subcontractors where they:

- Add specialist expertise
- Enhance the quality of training
- Widen access to apprenticeship opportunities
- Support employer and workforce needs.

Current Subcontracted Provision

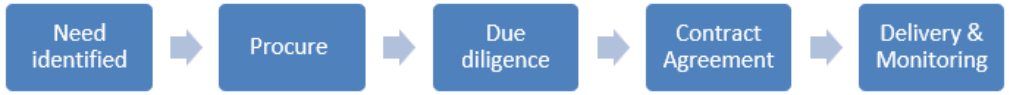
Subcontracted Service	Purpose
Functional Skills English & Maths	Specialist training to support apprentices working towards English and Maths qualifications.
Level 2 Pharmacy Services Assistant	Specialist training to expand apprenticeship opportunities and meet workforce needs.
Simulation Technician Specialist Workshops	Specialist expertise that enhances the quality and realism of training to develop required skills.

Additional subcontracting arrangements may be introduced, and existing arrangements amended, where this is necessary to meet the needs of delivering high-quality apprenticeship training.

All arrangements will be subject to HHFT's subcontractor selection and contracting processes.

[2] https://www.gov.uk/government/publications/apprenticeship-funding-rules-and-assessment-plan-guidance-2026-to-2027

3. How HHFT Selects Subcontractors



HHFT will undertake fair and transparent procurement activities. Selection and procurement of subcontractors will be carried out in accordance with the Trust's Procurement Policy.

HHFT will carry out comprehensive checks, including:

- Confirmation they meet the subcontracting requirements as set out in the Apprenticeship Funding Rules, including APAR[3] status where required
- A risk assessment of Safeguarding and Prevent arrangements
- Quality and performance information, including Ofsted and DfE outcomes where available, or evidence of capability for new subcontractors
- Financial health and organisational stability
- Verification of appropriate insurances, policies and procedures.

Key Principle:

Before using subcontractors, HHFT will request and assess evidence that subcontractors maintain suitable arrangements, which is appropriate to the **size, nature**, and **level of risk** of the services being delivered.

4. Roles & Responsibilities

HHFT will:

- Hold overall responsibility for the training conducted by subcontractors
- Ensure all subcontracting arrangements comply with the Apprenticeship Funding Rules and HHFT policies
- Complete a subcontractor declaration for subcontracted delivery as required by the DfE
- Provide contract management, quality assurance, oversight and support
- Ensure employers are informed where subcontracted delivery forms part of the apprenticeship programme.

Key Roles:

Strategic Lead: Associate Director of Apprenticeships and Widening Participation

Performance Management Leads: Apprenticeship Lead, Lead Internal Quality Assurer and Lead for Commissioned Apprenticeships and Functional Skills.

Subcontractors will:

- Comply with the current Apprenticeship Funding Rules and contractual requirements
- Notify HHFT promptly of any actual or potential issues that may affect their ability to fulfil the subcontracting agreement
- Participate in quality assurance, compliance and monitoring activities in relation to delivery.

[3] Apprenticeship Provider and Assessment Register (APAR), managed by the DfE

5. Contract Requirements

HHFT will enter a legally binding written agreement with the subcontractor before service delivery begins. The requirements of this policy, alongside the agreed terms and conditions form part of that contractual agreement.

All subcontracting will reflect the following:

- Apprenticeship Funding Rules for main providers, including any updates
- Ofsted's Further Education and Skills Inspection Toolkit[4].

HHFT, Ofsted and the DfE are granted full rights to monitor the quality of the subcontracted delivery in accordance with regulatory requirements.

6. How Service Delivery is Monitored

Key principle:

> HHFT adopts a **partnership approach** to subcontractor management to ensure **shared accountability**, **high-quality delivery** and **continuous improvement**.

Subcontracted performance will be reported through HHFT governance arrangements, including the:

- Annual Self-Assessment Report (SAR)
- Quarterly Apprenticeship Governing Body Meeting.

Examples of Monitoring Activities

Key principle:

> The frequency and scope of monitoring activity will be **proportionate** to the **size, nature** and **level of risk** of the subcontracted provision.

Activity may include:

- Meetings
- Sampling learner records
- Review of compliance documentation
- Observations of training and assessment practice
- Attendance records
- Achievement data
- Learner and employer feedback
- Internal/external quality assurance activity
- Other agreed methods.

As a minimum, each tutor delivering subcontracted provision will be observed at least **annually[5].** HHFT may also review internal and external quality assurance (IQA/EQA) records and other quality documentations where available as part of its monitoring activity.

[4] https://www.gov.uk/government/publications/further-education-and-skills-inspection-toolkit-operating-guide-and-information

[5] Using the latest HHFT Tutor Observation Record

7. Addressing Subcontractor Concerns

Where monitoring activities identify concerns with subcontractor performance, HHFT will work with the subcontractor to agree and monitor appropriate actions and ensure issues are resolved in line with the written subcontracting agreement.

Depending on the nature of the concern identified, HHFT may:

- Request an improvement plan
- Increase monitoring and quality assurance activity
- Arrange additional account meetings
- Escalate concerns through HHFT governance arrangements, including the Apprenticeship Governing Body.

8. Safeguarding Apprentices

Subcontractors **must inform** HHFT of any **safeguarding** or **Prevent concerns** related to HHFT apprentices at the **earliest opportunity.**

All subcontractors must:

- Maintain appropriate safeguarding and Prevent arrangements
- Report concerns promptly
- Comply with all relevant legislation and statutory responsibilities

Reporting A Safeguarding Concern:
Email safeguarding.apprentices@hhft.nhs.uk

The inbox is monitored by, and access is restricted to the:

- Designated Apprenticeship Safeguarding Lead (DSL)
- Designated Apprenticeship Safeguarding Officers (DSOs)

Concerns will be managed according to the HHFT Prevent and Safeguarding Apprentices Policy Guidance.

9. Business Continuity

As part of the pre-selection due diligence process, HHFT will assess the organisational stability of all subcontractors to help ensure the continuity of provision.

Subcontractors must notify HHFT promptly of **any circumstances** that may affect their ability to meet the agreed services. Where such circumstances do arise, HHFT will work with the subcontractor to minimise disruption, make alternatives arrangements where needed, and support **continuity of learning** wherever possible.

10. Data Protection

HHFT and its subcontractors will comply with the UK Data Protection Laws and the GDPR UK Principles in storing and Processing Personal Data.

Subcontractors must inform HHFT, as the lead provider, of any data protection concerns or breaches related to HHFT apprentices at the **earliest opportunity**.

Reporting Data Protection Concerns:
Concerns should be reported to the HHFT Designated Data Protection Officer (**information.governance@hhft.nhs.uk**) and the Apprenticeship Team copied into all correspondence (**apprenticeships@hhft.nhs.uk**).

Subcontractors are responsible for:

Ensuring concerns are managed and reported in accordance with contractual and organisational requirements, which may include involvement of their **Data Protection Officer (DPO),** or other **designated individual(s)** responsible for data protection.

11. Fees and Charges

HHFT will agree and maintain an itemised breakdown of subcontractor charges and may retain eligible funding to support the **effective management, quality assurance** and **oversight** of subcontracted provision.

Retained funding may be used to support:

- Quality assurance and improvement activities
- Performance monitoring and review meetings
- Contract management and subcontractor support
- Funding compliance, audit and data management
- Safeguarding and risk management
- Governance, reporting and oversight

Costs will be reasonable and proportionate to the agreed services provided, represent value for money and contribute to the delivery of high-quality apprenticeship training.

Employer Agreement

HHFT will put in place a written agreement with the employer about any subcontracted delivery included within their apprenticeship programme, including:

- The services delivered by the subcontractor
- Any associated charges
- Any eligible funding retained by HHFT

12. Payment Arrangements

Payment to subcontractors will be made following:

- Satisfactory delivery of the agreed services
- Within 30 days of the invoice being accepted by the NHS Shared Business Service (SBS)
- Subject to the inclusion of the correct purchase order number and invoicing address, and registration with SBS.

Invoicing Email: sbs.apinvoicing@nhs.net

Invoicing Address:
Hampshire Hospitals NHS Foundation Trust,
RN5 Payables F025,
PO BOX 312
Leeds, LS11 1HP