

# Cumbria Adult Learning Subcontracting Risk Register

Likelihood	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5

**Likelihood**    **Impact**

5: Very likely    5: Most severe  
 4: Likely        4: Major  
 3: Possible     3: Moderate  
 2: Unlikely     2: Minor  
 1: Very unlikely 1: Insignificant

		Description		Initial Rating (date)			Current Rating (27.12.2024)			Target Rating			Risk Management Actions
Ref no	Issued by	Risk description	Service	Impact (1-5)	Likelihood (1-5)	Rating	Impact (1-5)	Likelihood (1-5)	Rating	Impact (1-5)	Likelihood (1-5)	Rating	Commentary should focus on what new internal controls or improved measures have been made to reduce the likelihood of the risk arising.
1	CD	Reduction in DfE funding leading to cuts in provision	Adult Learning				5	3	12	5	3	12	<ul style="list-style-type: none"> <li>Diversify income sources</li> <li>Maintain efficiency savings</li> <li>Continue strong performance reporting and subcontracting monitoring</li> <li>Annual subcontracts following funding rules and changes to main ASF contract value</li> </ul>
2	CD	Failure to safeguard adult and young learners	Adult Learning				5	1	10	4	1	10	<ul style="list-style-type: none"> <li>Through monitoring ensure safeguarding training is in place</li> <li>Clear referral pathways</li> <li>DSLs in place</li> <li>Prevent duty followed and training in place</li> <li>DBS in place</li> <li>Safeguarding requirements built into contracts</li> </ul>
3	CD	Courses not meeting subcontracting rationale, local skills needs or learner demand	Adult Learning				4	2	8	4	1	4	<ul style="list-style-type: none"> <li>Carry our regular and detailed labour market analysis</li> <li>Subcontracting policy updated each year</li> <li>Introduction of employer engagement with links to subcontracting and direct delivery</li> <li>Accountability statement updated each year (linked to LSP)</li> </ul>
4	CD	Errors in UK returns, GDPR breaches, DB audit non-compliance	Adult Learning				4	2	8	4	1	4	<ul style="list-style-type: none"> <li>Carry out regular internal and subcontractor data audits</li> <li>GDPR requirements built into contracts</li> <li>MIS system checks</li> </ul>
5	CD	Low attendance and/or achievement affecting funding and reputation (particularly Maths, English, ESOL)	Adult Learning				5	3	15	5	2	10	<ul style="list-style-type: none"> <li>Use effective achievement forecast and carry out early intervention</li> <li>Ensure (through monitoring) that effective initial assessment processes in place</li> <li>Monitor attendance and punctuality</li> <li>Provide targeted learning support</li> <li>Utilise alternative funding initiatives to provide additional interventions</li> </ul>
6	CD	Risks in classrooms, community venues, or online learning	Adult Learning				5	2	10	5	2	10	<ul style="list-style-type: none"> <li>Through monitoring ensure relevant risk assessments are in place in line with H&amp;S policies</li> <li>Ensure digital safety protocols are in place and followed</li> <li>All staff to complete relevant ICT security online training</li> </ul>
7	CD	Negative publicity or complaints damaging community trust	Adult Learning				4	3	12	4	2	8	<ul style="list-style-type: none"> <li>Use corporate complaints policy to provide relevant response</li> <li>Carry out stakeholder engagement through regular community communications</li> <li>Continue strong working relationship with corporate teams to ensure proactive communications take place using relevant media</li> <li>Use monitoring framework to identify any feedback relating to subcontracted provision</li> </ul>
8	CD	Insufficient IT infrastructure or digital exclusion for learners	Adult Learning				3	3	9	3	2	6	<ul style="list-style-type: none"> <li>Promote and utilize blended learning course design and provide flexible learning opportunities with subcontractors</li> <li>Ensure access to relevant hardware in subcontractor delivery centres</li> <li>Provide access to up-to-date tutor IT training where required</li> </ul>
9	CD	Uncertainty and inconsistency in funding arrangements due to devolution of the Adult Skills Fund	Adult Learning				5	4	20	5	2	10	<ul style="list-style-type: none"> <li>Maintain close relationships with combined authority officials and DfE specialists</li> <li>Align curriculum planning and subcontracting policy with devolved authority priorities (e.g. local skills investment plans)</li> <li>Diversify funding streams (commercial income, bids for UKSPF and/or other new investment funding)</li> <li>Use subcontracting to build flexibility into curriculum to respond to changes in devolved priorities</li> </ul>
10	CD	Failure to deliver the Adult Skills Fund (ASF) contract in line with DfE requirements (e.g., under-delivery, non-compliance, missed targets) - for direct delivery and subcontractors	Adult Learning				5	2	10	5	1	5	<ul style="list-style-type: none"> <li>Closely monitor enrolments, retention, and achievement against target profile (monthly data reviews and subcontracting monitoring)</li> <li>Maintain strong MIS/data reporting systems aligned with DfE rules</li> <li>Develop contingency plans (e.g., subcontracting or sessional staff) to cover delivery gaps</li> <li>Engage learner on Skills provision through targeted provision (English, maths, ESOL, digital)</li> <li>Ensure compliance with funding guidance through regular audits and monitoring</li> <li>Escalation process to senior leadership if under-delivery risk identified early</li> </ul>
11	CD	Under or non delivery of subcontractors	Adult Learning				5	2	10	5	1	5	<ul style="list-style-type: none"> <li>Implement regular contract monitoring framework</li> <li>Develop accurate financial performance reporting framework</li> <li>Quickly identify under-performance and vice funding where appropriate (to direct delivery or other subcontractors)</li> </ul>