

# SUB-CONTRACTING PARTNERSHIP POLICY 2024-2025

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#### 1 Introduction

1.1 This policy statement, which undergoes annual review, outlines Bridgwater and Taunton College's rationale for engaging in sub-contracting partnerships for education, training and assessment delivery. It explains the College's criteria for selecting suitable partners and outlines its strategies for managing and monitoring sub-contracted provision to uphold the delivery of high-quality education, training and assessment. The College remains committed to avoiding subcontracting solely to meet short-term funding goals.

# 2 Policy Statement

- 2.1 The implementation of this policy is mandatory and must be established prior to any engagement in sub-contracting activities commencing from August 1, 2024. Its content is developed in accordance with the ESFA Funding rules, the College's financial regulations and the Subcontracting Standard as outlined in <a href="https://www.gov.uk/government/publications/esfa-subcontracting-standard/esfa-subcontracting-standard/econtract-development-andor-termination">https://www.gov.uk/government/publications/esfa-subcontracting-standard/esfa-subcontracting-standard/econtract-development-andor-termination</a>
- 2.2 The Education Skills Funding Agency defines a sub-contractor as an entity or individual engaged in a contractual and legally binding arrangement with a lead provider for the delivery of provision ultimately funded by the Education Skills Funding Agency. This policy primarily addresses 'provision sub-contracting,' where the College contracts out the delivery of provision funded by the ESFA to another organisation (subcontractor).
- 2.3 The College has collaborated with select sub-contractors and partners to deliver high-quality teaching, learning and assessment. This collaboration has encompassed apprenticeship provision and responsive delivery to adult and 16-18 learners' diverse settings, with the aim of engaging communities typically underrepresented in further education within the region and where we do not have the staff specialism and facilities etc.
- 2.4 In light of funding adjustments and an anticipated increase in directly delivered curriculum, the College is committed to continually evaluating its sub-contracted provision with the goal of further reduction in 2024/25. Consequently, the College will prioritise engagement with subcontractors initially approved by the Vice Principal Strategy & Partnerships. After this initial approval, recommendations will be sought from the Quality and Standard Committee before seeking final approval from the Board of Governors. These subcontractors must:
  - Demonstrate consistent delivery of the highest quality teaching and learning.
  - Facilitate high levels of progression into employment or higher learning for students, with a particular emphasis on progression onto mainstream further and higher education courses at the College.
  - Possess financial stability and can establish a sustainable relationship with the College.
  - Have or are committed to adopting robust quality assurance processes that align with those implemented by the College.
  - Have effective Safeguarding and Prevent practices in place.
  - Work together with the College to uphold and create a safe learning environment and ensure effective implementation of Safeguarding and Prevent standards.

- 2.5 The College differentiates between sub-contractors and Managing Agents, although they share similar traits. Managing Agents, distinctively, aren't directly funded by the College. Instead, they operate under service level agreements with the lead provider, assuming all risks regarding compliance and inspection. These partnerships are evaluated for strategic importance.
- 2.6 To date, the College's delivery partnerships have primarily focused on the development of apprenticeship provision, a trend expected to continue. Given the current lagged funding model employed by the Education Skills Funding Agency and the Apprenticeship Levy, the College anticipates the potential for growth in apprenticeship provision in the coming years.
- 2.7 Oversight and approval of our sub-contracted provision is conducted by Board of Governors through the Finance, Personnel and General-Purpose Committee via monthly management accounts and the Quality and Standards Committee who receive regular reports on the quality and scale and of the subcontracted provision. In 2023, the College commissioned RSM Risk Assurance LLP to review its management and governance of sub-contracted provision, incorporating the findings to enhance the effectiveness of management systems and controls.
- 2.8 The College endeavours to ensure that sub-contractors and delivery partners fully engage with its teaching, learning and assessment quality assurance processes. In 2024/25, sub-contracted provision will continue to be subject to lesson observation in line with directly delivered programmes of study. The College will also work to ensure that, where appropriate, sub-contractors and delivery partners adopt its approach to self-assessment and quality improvement.

### 3 Scope

3.1 This policy is applicable to all supply chain activities supported by funds provided by the Education Skills Funding Agency or any successor organisations.

#### 4 Overarching Principle

- 4.1 The College will utilise its supply chains to maximise the impact and efficiency of service delivery to the end user. Accordingly, the College will ensure that:
  - a) Supply chain management activities adhere to best practice principles in the skills sector, guided by the LSIS publication "Supply Chain Management – a good practice guide for the post-16 skills sector" (Nov 2012 and subsequent iterations) and the ESFA Subcontracting Standard.
  - b) The College will consistently engage in fair and transparent procurement processes, conducting rigorous due diligence procedures on potential sub-contractors to ensure compliance with the Common Accord at all levels and to guarantee the provision of high-quality learning delivery that demonstrates value for money and a positive impact on learner lives.
  - c) The funding retained by the College will correspond to the costs of the services rendered. These services and the levels of funding retained for them will be clearly documented and agreed upon by all parties. The rates of retained funding will be commercially viable for both parties and will be negotiated and agreed upon in a fair and transparent manner.

d) In instances where disputes between supply chain partners cannot be resolved through mutually agreed internal resolution procedures, the College will resort to independent outside arbitration or mediation and will abide by its findings. Contract documents will require both parties to agree that the achievements of supply chains are realised through adherence to both the letter and spirit of contracts or partnerships. Signatories commit to conducting all discussions, communications, negotiations and actions undertaken to establish, maintain and develop supply chains in good faith in accordance with the Overarching Principle.

# 5 Definition of Sub-Contracting

#### 5.1 What is a Lead Provider?

A lead provider is a college, training organisation or employer that has a direct contractual relationship with the ESFA. In the case of this document, Bridgwater and Taunton College is the lead provider.

#### 5.2 What is a Sub-Contractor?

A sub-contractor is a separate legal entity that has an agreement with the College to deliver any element of the education, assessment and training funded by the Education Skills Funding Agency or through Advanced Learning Loans. Sub-contractors may be informally called partners in the sector. However, for ESFA purposes, they are classified as sub-contractors.

## 6 Rationale for Sub-Contracting

- 6.1 The College strategically aims to minimise its engagement in sub-contracting activities. It prioritises utilising its funding allocations to directly support local students, employers and communities. This approach not only aligns with our core mission but also reduces the exposure to risks associated with poor performance by external organisations.
- While the College gives precedence to direct delivery, it acknowledges the potential benefits that effective sub-contracting arrangements can offer in broadening the scope and accessibility of provision for students and employers. Sub-contracting may be considered in the following circumstances:
  - When additional provision is required by existing employers or students beyond our current scope or capacity.
  - When sub-contracting enables the fulfilment of short-term needs of students or employers without subjecting the College to the risks and costs associated with establishing new provisions.
  - When sub-contracting facilitates capacity-building in new sectors or territories, enabling the transition to direct delivery or the expansion of income streams such as Apprenticeship funding.
  - To supplement niche or specialised provision or provide improved access to training facilities that the College may not be able to adequately resource.
  - When the due diligence process identifies the selected provider as high-quality and low-risk for the College.
  - To enhance opportunities for both young people and adults.
  - To improve geographical access for learners.
  - To create entry points for disadvantaged groups.

• To support individuals with protected characteristics and address potential gaps in provision.

# 7 Quality Assurance

- 7.1 Sub-contracted activity constitutes an integral aspect of the College's provision. The quality of this provision will be diligently monitored and managed through the existing college Quality Assurance (QA) processes and procedures, which will be adapted to comprehensively encompass all sub-contracted activity
- 7.2 This policy positions sub-contracted provision as a central component of college operations, fostering continual enhancements in the quality of teaching and learning for both the college and its sub-contractors. Achieving this objective will involve the dissemination of effective practices throughout the supply chain, facilitated, for instance, by the Self-Assessment Report process.
- 7.3 At a minimum, the College will enact the following Quality Assurance measures with sub-contractors, adhering to the College's quality cycle and the 7-Ways process:
  - Conduct desktop checks and due diligence visits for new providers.
  - Conduct annual due diligence reviews for existing providers.
  - Conduct three Quality Assurance visits per year, including at least one shortnotice visit, comprising face-to-face interviews with students and staff. These visits will be both announced and unannounced.
  - Perform three sample file checks, with at least one being a short-notice sample.
  - Conduct checks to ensure learner eligibility and existence.
  - Carry out observations of advice & guidance, assessment and teaching and learning practices.
  - Ensure that funding is used for its intended purpose and complies with guidelines for <u>Funding higher risk organisations and subcontractors</u> as outlined by GOV.UK.
- 7.4 The College will outline a programme for each visit, including:
  - Standard visit agenda
  - Short-notice visit agenda.
  - Quarterly contract management meetings with the Head of Apprenticeship Development, which may coincide with Quality Assurance visits.
  - Annual surveys of students and, if applicable, employers.
  - Annual audit of Management Information System (MIS) data, encompassing enrolment forms and attendance records.
  - Annual review of learner documents, including tracking records, reviews and Individual Learning Plans (ILPs).
  - Quarterly review of sub-contractor success rates, self-assessment processes and Quality Improvement Plans
- 7.5 The College reserves the right to request the sub-contractor to undergo additional quality improvement measures, which may incur costs to the sub-contractor in accordance with the College's published fees. These measures may include:

- Additional standard or short-notice visits.
- Additional surveys of student or employer perspectives.
- Lesson or assessor observations.
- Staff Continuing Professional Development (CPD).
- Consultancy services from the College or external consultants.

### 8 Payments to Sub-Contractors

8.1 Before the 19th of each month, the College will provide the sub-contractor with the ESFA Funding Report for the previous month's activity, along with a purchase order. Subsequently, the sub-contractor will submit an invoice for the agreed percentage of the funding value as specified in the purchase order. Payments to sub-contractors will be made within 30 days of receipt of a valid claim for payment, submitted in accordance with the terms outlined in the individual sub-contractor agreement.

#### 9 Publication of Information Relating to Sub-Contracting

- 9.1 In accordance with the guidelines set forth by the Education Skills Funding Agency and other relevant agencies, the College will publish its sub-contracting fees and charges policy, as well as actual end-of-year sub-contracting fees and charges, on its website prior to the commencement of each academic year. This disclosure will specifically pertain to 'provision sub-contracting,' referring to the sub-contracted delivery of full programmes or Standards.
- 9.2 The College will ensure that all current and potential sub-contractors have access to this policy and any pertinent documents, including the Fees and Charges Risk Factor Table. This table will encompass:
  - The typical range of fees retained for sub-contractor management and the methodology behind this range calculation.
  - The rationale used to determine the level of fee retention, employing a risk-based approach.
  - Contributory risk factors influencing variations in fees charged or support provided to different sub-contractors, such as previous track record, success levels, customer demographics, type of provision and contract duration.
  - Utilisation of risk bands to allocate college charges, with risk factors assigned scores to clarify sub-contractor classification. This process will incentivize subcontractors to improve and potentially reduce their risk band, leading to adjustments in funding allocation and support levels.
  - Payment terms governing transactions between the college and sub-contractors, including payment timelines concerning provision delivery and invoice settlement.
  - The support mechanisms available to sub-contractors in exchange for the fees charged.

#### 10 Communication

10.1 This policy will undergo review each summer term and will be updated as necessary. It will be publicly available on the college website in July preceding the start of the academic year to which it applies and shared on the website www.btc.ac.uk. Potential sub-contractors will be directed to this policy as the initial point of reference in any prospective relationship.

## 11 The Fees and Charges Risk Factor Table 2024/25

- 11.1 The standard management fee charged by the college is set at 20% of all funding drawn against the provision to be delivered. This percentage represents the comprehensive cost incurred by the College in effectively identifying, selecting and managing all sub-contracted provision. It includes the minimum level of Quality Assurance (QA) activity attached to partners posing the lowest possible risk in sub-contracted relationships.
- 11.2 Additional charges to cover supplementary costs may be added to the base 20% fee to address the College's expenses related to any additional support deemed necessary to ensure the quality of teaching and learning, the overall learner experience and the success rates of sub-contracted provision. These additional costs are determined using a weighted table of risk factors, accessible to all actual and potential sub-contractors. The intention is to ensure that the expense of any extra support provided to a sub-contractor is covered through the retained funding. These costs will be reassessed and negotiated annually at contract renewal, allowing sub-contractors the opportunity to reduce fees through continuous improvement. This approach enables the College to focus support where and when it is most needed. Please refer to Appendix 2 for further details.
- 11.3 The management fee encompasses a range of services, including Due Diligence checks, regular Contract and Compliance Meetings throughout the year and quality assurance activities such as Information, Advice and Guidance (IAG), Teaching and Assessment Observations, both Unannounced and Announced Visits, Desktop Audits, Existence and Eligibility Checks, File Audit, processing of data into the Individual Learner Record (ILR), standard Continuing Professional Development (CPD) and Training opportunities for subcontractor staff (including Safeguarding and Prevent training) and access to college QA paperwork, policies and procedures.

### 12 Additional Support for Sub-Contractors

12.1 The specific additional support provided to each sub-contractor will be negotiated individually, based on a 'risk band' approach. It may include additional site visits, lesson observations, tutor support and more rigorous verification processes. The risk band will be determined using the table provided in Appendix 2.

# 13 Additional Charges per Student

13.1 The College may also retain funding to cover the cost of any funded activity undertaken on behalf of the sub-contractor, such as Awarding Body fees and charges, hiring of facilities/equipment within/from the College and Internal Verification.

# 14 How We Select and Appoint our Sub-Contractors

- 14.1 The selection and appointment of our partner providers involve a thorough and rigorous due diligence process. In choosing our partner providers, we consider the following criteria:
  - Reputation: Partners may be recommended by employers or other Further Education (FE) Colleges.
  - Specialism: Partners may offer specialised provision where alternatives are limited.

- Geographic location: Preference is given to supporting local partners whenever possible.
- Quality measures: Assessment based on various factors including Ofsted ratings, success rates and track record.
- Responsiveness: Evaluation of the provider's ability to promptly meet the needs of our students and employers.
- Safeguarding and Prevent Duty agendas: Compliance with these requirements and assurance of student safety.
- Modern Slavery: Adherence to the College's commitment to combatting Modern Slavery within its own operations and supply chain. Sub-contractors are expected to comply with the College's Modern Slavery Policy, currently under development.
- Potential conflicts of interest.
- Disclosure and Barring Service (DBS) checks on all subcontracting staff relevant to the contract.
- Listing on the old Register of Training Organisation (RoTO) and/or the
  Apprenticeship Providers and Assessment Register (ARAP) and the total value of
  sub-contracts they hold. Additionally for a subcontractor who is not on APAR.
  This subcontractor must not exceed £100,000 of apprenticeship training and onprogramme assessment under and EFSA/DFE contract across all main providers
  and employer-providers between 1 August and 31 July each year, they must also
  hold a current UKPRN and cannot deliver any full apprenticeship standard.
- Lack of a track record: new organisations or those offering new or developing
  provision are not automatically disqualified from sub-contracting opportunities.
  However, quality assurance measures and associated costs will reflect the
  additional risks associated with new provision.
- Following initial selection, the College conducts a desktop due diligence check of potential partners, followed by a due diligence visit to the delivery premises prior to contract issuance.
- Annual due diligence review for existing sub-contractor partners.
- Financial health checks aligned with the Funding higher-risk organisations and subcontractors policy outlined on GOV.UK.

These criteria ensure that our sub-contractors meet the necessary standards and requirements, safeguarding the quality and integrity of the provision delivered.

### 15 Clarity of Roles and Responsibilities

15.1 The college and sub-contractor are responsible for:

#### 15.1.1 Quality Assurance:

#### College:

- Develop and implement robust quality assurance policies, procedures and processes to ensure compliance with ESFA requirements.
- Conduct regular internal audits, inspections and reviews of subcontracted provision to maintain and enhance quality standards.
- Provide guidance and support to the Subcontractor in addressing any identified quality issues or areas for improvement.

#### Sub-contractor:

 Adhere to the College's quality assurance policies and procedures and actively participate in quality monitoring activities.

- Uphold high standards of teaching, learning and assessment to ensure the quality of provision.
- Collaborate with the College to address any identified areas for quality enhancement and implement necessary actions.

#### 15.1.2 Contract Management:

### College:

- Manage the contractual agreement with the Subcontractor, including monitoring performance against agreed targets and milestones.
- Ensure compliance with contractual obligations, funding rules and regulatory requirements.
- Evaluate and approve subcontracting arrangements, ensuring transparency and fairness.

#### Sub-contractor:

- Fulfil contractual obligations as outlined in the agreement with the College, including meeting performance targets and reporting requirements.
- Comply with funding rules and regulations, providing accurate and timely data to the College for reporting purposes.
- Inform the College of any significant changes or challenges that may impact the subcontracted provision.

#### 15.1.3 Teaching, Learning and Assessment:

# College:

- Provide guidance and support to the Subcontractor in delivering high-quality teaching, learning and assessment.
- Monitor and evaluate the effectiveness of teaching and assessment practices within the subcontracted provision.
- Collaborate with the Subcontractor to implement continuous improvement strategies in teaching and learning.

#### Sub-contractor:

- Deliver teaching, learning and assessment in accordance with the agreed curriculum and assessment plans.
- Ensure the quality and consistency of teaching and assessment practices, adhering to regulatory standards and requirements.
- Engage in professional development activities to enhance teaching and assessment skills.

# 15.1.4 Safeguarding and Prevent:

# College:

- Must establish clear Safeguarding and Prevent policies and conduct staff training on identifying and reporting concerns.
- Should oversee subcontractors to ensure adherence to Safeguarding and Prevent policies, regularly checking for compliance.
- Must monitor subcontractor practices, promptly report any issues and take necessary action
- Collaborate with subcontractors to foster a safe learning environment, ensuring effectiveness of Safeguarding and Prevent standards.

#### Sub-contractor:

- Must follow the College's Safeguarding and Prevent policies and actively engage in monitoring activities.
- Ensure staff receive annual training on Safeguarding and Prevent responsibilities.
- Responsible for risk assessment, reporting concerns to the College and maintaining incident records.
- Collaborate with the College to uphold a safe learning environment and ensure effective implementation of Safeguarding and Prevent standards

# 16 Review of Policy

16.1 This policy will be reviewed in each summer term and updated as required.

# Appendix 1 – Due Diligence Checks

# **Sub-Contracting Requirements**

Due Diligence documents required for	Notes/College Actions
desktop assessment	Notes of Control of Co
Copy of latest set of audited accounts	To be reviewed by College Finance team
Copy of evidence of registration on ROTO or APAR	To be reviewed by Due Diligence Panel
Full names of all Heads/Trustees/Senior Managers	Complete company house check
Copy of Management Structure	To be reviewed by Due Diligence Panel
Copy of most recent Ofsted report	Require grade 1 -2
Copy of most recent Self-Assessment Report (SAR) – where applicable	Require grade 1 -2
CVs for all staff delivering training/ assessment	To be reviewed by SQS
Copy of contract of employment/evidence of contract of employment for all staff delivering training/assessment	To be reviewed by SQS
DBS numbers for all staff delivering training/ assessing	To be reviewed by Due Diligence Panel
Copy of staff certificate for the member (s) of staff responsible for training/assessing	To be reviewed by SQS
Copy of Health & Safety Policy	To be reviewed by Due Diligence Panel
Copies of risk assessments	To be reviewed by Due Diligence Panel
Copy of disaster recovery policy	To be reviewed by Due Diligence Panel
Copy of Employers/Public/Professional liability insurance certificate	Minimum £10 million for Employers Liability Insurance and £5 million for Public Liability Insurance. Certificate to be in date.
Evidence of Initial Advice & Guidance (IAG) and IAG Policy	To be reviewed in line with BTC policy
Copy of policies for compliance with legislation on employment and immigration	To be reviewed in line with BTC policy
Copy of Complaints procedure	To be reviewed in line with BTC policy
Copy of Equality and Diversity procedure	To be reviewed in line with BTC policy
Details/evidence of DBS compliance	To be reviewed in line with BTC policy
Copy of Numeracy and Literacy Policy	
Copy of Safeguarding policy	To be reviewed in line with BTC policy
Copy of Sustainability policy	To be reviewed in line with BTC policy
Copy of PREVENT policy	To be reviewed in line with BTC policy
Copy of British Values policy	To be reviewed in line with BTC policy
Copy of Mission Statement	To be reviewed in line with BTC policy
Copy of Data Protection policy	To be reviewed in line with BTC policy
Evidence of how they comply with the Prevent Duty.	To be reviewed in line with BTC policy

Due Diligence documents required for	Notes/College Actions
desktop assessment	
Copy of Awarding Body Centre Approval – where appropriate	To match qualifications being delivered
Copy of most recent External Verifiers Reports – where appropriate	To be reviewed for serious issues

# The Sub-Contractor will provide the following:

Required during Academic Year	Frequency/Due by
Return signed contract and appendices	Before 1 <sup>st</sup> August/start of delivery
	programme
Deliver the Programme(s) in accordance	In line with the College timetable
with the College's quality assurance	
arrangements	
Self-Assessment Reports in line with the	In line with the College timetable
College's requirements	
Run Assessment Boards	In line with the College timetable
Signed and fully completed enrolment form	Within 2 weeks of the course commencing
for each learner;	
□ Copy of recent benefits evidence if	
claiming fee remission	
Full registers or contact records (NVQs)	Every half term (or as soon as a short
	course ends)
Withdraw any students who have missed	Within 1 month after missing 4 consecutive
more than 4 consecutive weeks	weeks
Timetable of delivery including session	Before course(s) commence
times, venues and teaching staff	
Copies of achievement certificates as soon	As soon as received
as received from the Awarding Body	
Copies of all EV reports	As soon as received
Feedback questionnaires from students	In line with college timetable
Raise invoices per agreed payment	Per agreed schedule
amounts and schedule	

# Appendix 2 – Quality Assurance Measures

# The College will score each performance indicator as follows:

Performance Risk Ra			Score		
Indicator	Low	Medium	High	Not Measurable	
	1	2	3	3	
Delivery experience of the sub- contractor	More than 5 full years	2 to 5 full years	Less than 2 full years		
Previous years	3% or more	Within $+$ or $= 2\%$ of	More than	No previous	
success rate	above benchmark	benchmark	2% below benchmark	delivery record	
Ofsted or SAR	Grade 1 or 2	Grade 2	Grade 4	No Ofsted	
grading				grading	
Type of	Provision	Medium risk e.g.	Provision	No self-	
provision	deemed to be low	BTC experience in	deemed to be	assessment	
	risk e.g. BTC	managing this type	high risk e.g.	process	
	experience	of delivery	distance		
			learning or difficult client		
			group		
BTC audit and	Compliant and no	Mainly compliant	Not compliant	No previous	
QA measures	actions or	but	and actions	audit as new	
	recommendations	recommendations	required to	provision	
		to improve	improve		

Overall	Risk
Score	Rating
5 – 7	Low
8 – 12	Medium
13 – 15	High

Funding Element Retained for Sub-Contractor Management			
Volume	Low Risk	Medium Risk	High Risk
Under £50,000	15%	20%	We do not contract
£50,000 -£100,000	15%	20%	We do not contract
Over £100,000	15%	25%	We do not contract

# Appendix 3 – Fees and Charges Structure

The following activities are included in the standard contract management and covered by the retained funding element. To ensure that it is reasonable and proportionate to the delivery of teaching or learning and how each cost contributes to delivering high quality learning.

Activity	Number/Frequency included in standard		
	retained funding element		
Pre-Contract Processes – Subcontractor Management- 1.5%			
Due diligence desk top checks	1 at set-up		
Due diligence visit	1 per site, up to 3 sites		
Annual due diligence	1 per year		
Issuing standard sub-contract agreement	1 per year		
MIS and Finance Processes – Support Co			
Issuing BTC document templates and forms to be used by the sub-contractor	As and when amended		
Agreeing use of sub-contractor templates and forms (if at least as good as BTC documents)	1 per year		
Entering learner data and amendments onto ILR	All		
Entering attendance data and reconciling with ILR	All		
Calculating fees due and processing payments received	All		
Data-match checks with other main contractors with whom	All		
the sub-contractor works			
Quality Assurance Monitoring - 8% (15% Management Fee)	or 13% (20% Management Fee)		
Quality assurance visits and lesson/assessor observations	3 per year		
SAM meetings 3 per year	3 per year		
Annual survey of students	1 per year		
Annual survey of employers (if applicable)	1 per year		
Annual audit of MIS data including enrolment forms and attendance records	1 per year		
Review of learner documents including tracking records, reviews and ILPs	3 per year		
Annual review of the sub-contractor provision within the college self-assessment process and Quality Improvement Plan	1 per year		
Incorporate the sub-contractor provision within the partnership manager	Typically, 1 or 2 phone calls or emails per week, more for new providers		
Sub-contractor staff to attend college CPD activity			

The following measures will be implemented effective August 1st, 2024. These delineated costs represent the individual components of the management fee aimed at facilitating quality monitoring and support activities. These efforts are integral to fostering the delivery of high-quality learning experiences.

Activity	Cost to sub-contractor		
Pre-Contract Processes – Subcontractor Management- 1.5%			
Additional due diligence investigation, e.g. to investigate	£40 per hour		
financial records or take additional references			
Produce action plan as a result of unsatisfactory due	£40 per hour		
diligence checks or visits			
Additional due diligence visit to monitor improvements	£40 per hour		
Additional due diligence visit to additional delivery	£40 per hour plus transport		
locations	costs		
MIS and Finance Processes – Supp	ort Costs – 5.5%		
Returning enrolment forms or other documents due to	Normally no charge but		
incorrect completion	continued non-compliance will		
	incur non-compliance letter		
	charge		
Non-compliance letter from College Director of Busines	s £40		
Development & Marketing requiring improvement			
Quality Assurance Monitoring - 8% (15% Managemen	t Fee) Or 13% (20% Management Fee)		
Self-assessment report (if not produced to satisfactory	£40 per hour		
standard by sub-contractor)			
Quality Improvement Plan (if not produced to a	£40 per hour		
satisfactory standard by sub-contractor)			
Quality assurance – site visits	£40 per hour plus transport		
	costs		
Quality assurance – remote (desk top review)	£40 per hour		
Contract Management review meetings	£40 per hour		
Additional survey of students	£200 + external survey costs		
Additional survey of employers (if applicable)	£200 + external survey costs		
Providing consultancy support (Director level)	£60 per hour		

The subsequent rates will be applicable to supplementary services that the college may furnish for the subcontractor:

Service	Cost
Registration of students on college centre with	Cost + 10%
Awarding Body	
Certification of students from Awarding Body	Cost + 10%
Certification of apprentices with EPAO	Cost + 10%
Internal verification	To be agreed depending on
	provision
Providing consultancy support	£60 per hour

#### **Data Protection**

Subcontractors must ensure compliance with the General Data Protection Regulation 2018 and all corresponding United Kingdom legislation. They shall refrain from actions that would result in the College's violation of these provisions. Additionally, subcontractors are obligated to indemnify the College against any liabilities, costs, expenses, damages, losses and professional costs incurred as a result of any breach of this warranty.