

DN COLLEGES GROUP

Subcontracting Fees & Charges Policy

1. Purpose

1.1

The purpose of this policy is to set out how DN Colleges Group (“**the College**”) manages subcontracted provision in a manner that ensures:

- effective stewardship of public funds, ensuring they are used appropriately, transparently and in the best interests of learners;
- delivery of high-quality education and training that provides demonstrable value and positive outcomes for learners and employers;
- compliance with Department for Education (DfE) funding rules, devolved authority requirements, and the DfE Subcontracting Standard;
- a no risk-based approach to the selection, management, and monitoring of subcontractors; and
- clear and transparent arrangements relating to subcontracting fees, support, and charges.

This policy also sets out the College’s commitment to ensuring that subcontracting arrangements are justifiable, proportionate, and aligned to the College’s strategic priorities, and are subject to appropriate oversight by Senior Leadership Team (SLT) and Corporation Board.

2 Scope

2.1

This policy applies to all subcontracted provision funded by the Department for Education (DfE), Department for Work and Pensions (DWP), and relevant Combined Authorities including South Yorkshire Mayoral Combined Authority (SYMCA), Humber and East Yorkshire Combined Authority (HEYCA) and Greater Lincolnshire Combined County Authority (GLCCA), across 16-18 study programmes, Adult Skills Fund provision and Apprenticeships.

This policy governs any potential and actual subcontracting arrangements for which the College intends to claim or actually claims public funding for provision that is delivered on behalf of the College.

This policy applies to all stages of subcontracting activity, including:

- procurement and pre-award activity
- due diligence and approval
- contract award and management
- performance monitoring and quality assurance
- review, variation, and termination

The implementation of a policy of this nature is a compulsory requirement for every further education college and every private training provider who intends to subcontract government funding.

The policy has been developed in accordance with the DfE Subcontracting Funding Rules, devolved authority funding requirements, and the DfE Subcontracting Standard, which provides the framework for the oversight and management of subcontracted provision.

3 Responsibilities

3.1

The College recognises that subcontracting can play an important role in extending the range, accessibility, and responsiveness of provision for learners and employers. However, subcontracting is also recognised as a higher-risk activity, requiring strong governance, oversight, and control.

The Department for Education defines a subcontractor as “*a separate legal entity or an individual (not an employee) that has an agreement (called a subcontract) with a lead provider to deliver any element of the education and training we fund*”.

The College will prioritise direct delivery wherever possible and will only subcontract provision where there is a clear and evidenced rationale that demonstrates added value.

Subcontracting will only be approved where it:

- aligns with the College’s Strategic Plan and curriculum priorities;
- supports delivery against Local Skills Improvement Plans (LSIPs) and regional economic need;
- enhances the quality and breadth of the College’s curriculum offer; and
- provides demonstrable benefit to learners, employers, and communities.

Subcontracting will not be used to meet short-term funding or financial objectives.

The College will only enter subcontracting arrangements where one or more of the following applies:

- enhances the opportunities available to learners
- fills gaps in niche or expert provision or provides better access to training facilities
- supports better geographical access for learners
- support an entry point for disadvantaged groups or considers the impact on individuals with shared protected characteristics, where there might otherwise be gaps

The College’s specific rationale for entering into a particular subcontract shall be stated within the schedules to the corresponding subcontract.

The College will only subcontract provision to organisations that:

- are legal entities with appropriate financial standing;
- are registered on the UK Register of Learning Providers (UKRLP) and hold a valid UKPRN;
- successfully complete the College’s procurement and due diligence processes; and
- demonstrate the capacity, capability, and compliance required to deliver high-quality provision.

The College will not permit second-level subcontracting under any circumstances.

All subcontracting activity undertaken by the College will be underpinned by the following principles:

- **Accountability:** The College retains full accountability for all subcontracted provision, including learner outcomes, quality of education, and compliance with funding rules.
- **Transparency:** All subcontracting arrangements, including fees and charges, will be clear, transparent, and accessible to stakeholders.
- **Value for Money:** Subcontracting must demonstrate that public funds are used efficiently and contribute directly to high-quality provision and learner success.
- **Quality and Continuous Improvement:** Subcontractors will be expected to meet the same standards of teaching, learning, and assessment as directly delivered provision.
- **Risk Management:** A **risk-based approach** will be applied throughout the subcontracting lifecycle, including selection, monitoring, and contract management.
- **Compliance:** All subcontracting activity will comply with DfE and devolved authority funding rules, and the requirements of the DfE Subcontracting Standard.

Subcontracting may in particular arise in connection with the College being named as the lead provider for a collaborative bid and/or establishing strategic partnerships that enable growth opportunities.

4 Definitions and/or Relevant Legislation

4.1 Definitions:

'College' refers to DN Colleges Group (and its subsidiaries) including Doncaster College, North Lindsey College campuses and satellite campuses.

'Contract' refers to any form of contract or agreement for the supply of goods, services and/or works that the College enters into.

'Due diligence' refers to the checks in which the College conducts to identify and manage risk before an activity goes ahead.

'End point assessment (EPA)' refers to the testing of the knowledge, skills and behaviours that an apprentice has gained during their training. Unique to each standard, EPA demonstrates the competence of an apprentice in their role. This competence is valued by current and future employers.

'Gateway' refers to the review by the employer and training provider of their apprentice's knowledge, skills and behaviours to see if they have met the minimum requirements of the apprenticeship set out in the apprenticeship standard and are ready to take EPA.

'Procurement' refers to the purchase, contract hire, lease, rental or any other form of acquisition which results in a contract where the College is purchasing Goods, Works or Services from a third-party Supplier. Procurement also includes the establishment of Framework Agreements and Dynamic Purchasing Systems.

'Subcontractor' refers to a third party that is engaged in a contractual and legally binding arrangement with DNCG, to deliver education and training provision as funded by Department for Education/SYMCA/other public funding as appropriate.

'Tender' refers to a formal process by which proposals are requested by the College and received from Suppliers in relation to a Procurement, making reference to a price and (where applicable) other information.

4.2 Specific legislation that may need to be referenced in this policy;

5 The Policy

5.1 The College shall, in respect of each subcontract, deduct and retain from the Department for Education/SYMCA/other public funding an amount calculated in accordance with the schedules to the relevant subcontract document by way of quality assurance, administrative support and delivery fees as agreed with the relevant subcontractor. Further details of how these retained amounts are used by the College are set out below (in addition to being set out in each subcontracting contract itself).

The College will determine the level of fees retained through a risk-based and needs-led approach, ensuring that the level of retained funding reflects:

- the level of risk associated with the subcontractor and provision;
- the scale, complexity and delivery model of the subcontracted activity;
- the level of quality assurance and support required to maintain standards; and
- the administrative, compliance and contract management activity required to meet regulatory expectations.

All fee arrangements will be agreed as part of the contract negotiation process and will be clearly set out within the subcontract agreement.

5.2 Risk banding table

The College applies a risk-based approach to determining retained funding, with subcontractors assessed against a range of factors including (but not limited to):

- organisational and financial stability;
- previous performance and quality outcomes;
- experience of delivering funded provision;
- type and complexity of provision; and
- level of oversight required by the College.

Based on this assessment, subcontractors will be assigned a risk rating, which will inform the level of funding retained, as set out below.

Risk Rating	Management Fee (all provision types)
Low	15%
Medium	20%
High	*TBC

*Management fee for any subcontractor considered to be high risk to be negotiated at point of contract and only following agreement by DfE of the proposed charge.

The College reserves the right to adjust retained funding levels where the risk profile of

the subcontractor changes during the contract period, or where additional support or intervention is required.

Funding retained by the College reflects the actual costs incurred in the effective management and oversight of subcontracted provision, including:

- contract management and performance monitoring
- quality assurance and improvement activity
- compliance with funding rules and audit requirements
- management information systems and data processing
- safeguarding, equality, and statutory compliance support
- learner support services and access to College resources

5.3 Sample breakdown of how the College would typically apportion a management fee across key areas of activity:

Percentage of fee	Activity
10%	processing enrolments, learner registrations, IT platform access for managing learner progress, access to the college staff training platform, safeguarding platform and IT support
5%	provision of learner materials including handbook and induction support
40%	managing the quality of provision including observations, IQA, SAR/QIP monitoring and support
35%	management of the subcontract including monthly contract meetings, operational management meetings and support, curriculum accountability framework, preparation of PFR reports
0%	delivery of specific training (varies dependent on subcontractor and funding stream)
0%	provision of specific delivery equipment or materials (varies dependent on subcontractor and funding stream)
10%	provision of learner support by College teams and access to the groups facilities and resources

In all cases, these costs must represent reasonable and proportionate costs based on the management and support required to deliver the relevant programme and each cost must contribute to the delivery of high-quality learning. This will be determined as part of the initial due diligence and contract negotiation process and for each subcontract will be explained further in the schedules to the relevant subcontract.

The College will ensure full transparency of subcontracting arrangements by:

- publishing its Subcontracting Fees and Charges Policy on its website;
- clearly documenting fee arrangements within each subcontract agreement; and
- publishing, in line with funding rules, actual levels of funding retained and paid to each subcontractor following the close of the funding year.

Where additional activity is required to manage risk, support performance improvement, or ensure compliance with funding rules, the College may apply additional charges.

Any such charges will:

- be agreed in advance with the subcontractor;
- reflect the actual cost of additional activity undertaken; and
- be clearly documented within the subcontract agreement or variation.

5.4 **SELECTION OF SUBCONTRACTORS INCLUDING DUE DILIGENCE AND TENDERING**

The College will operate a fair, transparent and compliant procurement process for all subcontracting activity, ensuring that:

- subcontractors are selected based on quality, capability, and strategic fit;
- public funds are used to secure high-quality provision that delivers value for money; and
- all subcontracting arrangements are supported by robust due diligence and risk assessment.

If the College has not previously subcontracted provision funded by the Department for Education, SYMCA, HEYCA or GLCCA it will seek approval in writing from the relevant agency prior to awarding a related contract with a subcontractor.

Where subcontracting is identified as appropriate, the College will undertake a structured procurement process, which will include:

- inviting providers to submit an application or tender;
- evaluating submissions against defined criteria including quality, financial stability, capacity, and strategic alignment; and
- ensuring compliance with the College's Procurement Policy and relevant funding body requirements.

The College reserves the right to reject applications at any stage where providers do not demonstrate the required standards.

5.5 All potential subcontractors must successfully complete a robust due diligence process prior to the award of any contract. This process will include, but is not limited to:

- assessment of financial health and stability, including credit checks and review of accounts;
- evaluation of quality of provision, including outcomes, inspection grades (where applicable), and track record;
- review of policies and procedures, including safeguarding, health and safety, equality and diversity, and data protection;
- confirmation of legal entity status and registration on UKRLP with a valid UKPRN;
- assessment of capacity, capability, and delivery model; and
- identification of potential risks, including reputational, operational, and compliance risks.

Where appropriate, the College will undertake site visits and pre-contract validation checks to confirm the suitability of the subcontractor and delivery environment.

Following due diligence, each subcontractor will be subject to a formal risk assessment, which will inform:

- the decision to award a subcontract;
- the level of retained funding and support required; and
- the level of oversight and monitoring applied throughout the contract.

Subcontracting proposals, including associated risks and financial values, will be subject to approval through the College's governance processes, including Senior Leadership Team and Corporation Board.

If the applicant is successful and satisfies all related checks and other requirements, the College will approve the applicant to work with the College as a subcontractor and an initial 1 year subcontract shall be issued and reviewed annually.

Once subcontractors have been engaged on a subcontract, they are required to complete an annual delivery proposal to remain on the College's supply chain and be awarded with new subcontracts.

Due diligence will not be a one-off activity. The College will:

- undertake annual due diligence refresh assessments for all subcontractors;
- monitor financial health, performance and compliance on an ongoing basis; and
- take appropriate action where risks are identified, including enhanced monitoring, suspension of recruitment, or termination of contract.

Any subcontractor who fails to meet required standards may have their contract reduced, suspended or terminated in line with contractual terms.

Where a subcontractor is in receipt of an aggregate subcontract value of Department for Education funding for delivering education and training that totals £100,000.00 or more in any funding year, the College will share the results of any related due diligence checks with the Department for Education via a signed return on a timely basis. The College will not permit subcontracting to take place with anyone who does not hold a direct written contract with the College. No secondary level of subcontracting is permitted.

The College will, at the end of each academic year, publish information relating to the actual levels of funding retained and paid for each of the College's subcontractors.

5.6

CONTRACTING AND PAYMENT TERMS

All subcontractors engaged by the College will be issued with a written subcontract. The subcontract will set out the maximum amount of funding that is available to the subcontractor under the relevant subcontract (i.e. maximum contract value) and the payment procedure (monthly or otherwise). The College will agree a fee structure and payment schedule with each subcontractor that recognises the full extent of that subcontractor's subcontracted provision, the risks presented by this and the costs to the College of related contract management and risk mitigation.

The Projects and Contracts Team are the contract and budget holders, and the Vice Principal Business Growth, Skills and Partnerships holds overall responsibility for all subcontracts and the Projects and Contracts Team. Subcontractors' performance updates will be provided to the College's Senior Leadership Team meetings on a monthly basis.

The College reserves the right to vary the profile under any subcontract to meet any relevant requirements of the relevant funding body (including any requirements set out in any applicable rules such as any relevant performance management rules). The College also reserves the right to adjust any applicable subcontract profile where a subcontractor does not achieve any aspect of the relevant profile.

The College will not be under any obligation to make payment to the subcontractor in respect of any learners over and above any agreed upper limit on the number of learners or the maximum amount of funding allocated to the subcontractor.

The College's payment terms to subcontractors are 30 days from receipt of a valid invoice. Payments may be subject to clawback under the terms of the relevant subcontract upon certain types of default by the subcontractor (i.e. for under-delivery).

Any minor variations to contract will be made annually in line with the regular revision and issuing of subcontracts prior to a new contract year. Major variations to contracts will be submitted for approval to the Senior Leadership Team and relevant Governor committee as appropriate please see Appendix A for Contract Change Process for Subcontractors).

5.7

QUALITY & SUPPORT

The College will actively work with subcontractors to continuously improve the quality of the teaching and learning that they deliver and thereby ensure continuous improvement of the overall quality of teaching and learning for all College learners.

The College will provide timely and meaningful feedback to both the subcontractor and their delivery staff and where appropriate ensure that any related observations are incorporated into the College's moderation and standardisation process (in order for the improvement actions to impact both internal and subcontractor quality).

'Learner voice' surveys to gather feedback from learners will be carried out throughout the duration of the subcontract.

The College will support its subcontractors in ensuring that they have appropriate policies and procedures in place to support the fulfilment by the College of its statutory and other legal obligations.

The College will support subcontractors to develop an effective Self-Assessment Report (SAR) and an effective Quality Improvement Plan (QIP) for incorporation into the College's own group SAR. In addition, the College will support subcontractors to develop and regularly complete a Curriculum Accountability Framework (CAF) to monitor learner performance.

The College will offer to its subcontractors:

- Monthly contract management meetings
- Quality observations/support in line with The College's Quality Monitoring Cycle
- Professional training and development of relevant subcontractor staff
- Access to relevant learning resources and materials
- Participation in the College's observation of teaching and learning process
- Access to relevant in-house training delivered by the College
- Monitoring of initial guidance, assessment and delivery of learning programs

Please see Appendix B, Subcontracting Framework for Joint Working, for further breakdown of Subcontractor and DNCG responsibilities.

The College recognises its responsibility to support all subcontractors to develop, deliver and sustain high quality provision that meets the needs of the community and learners.

The deducted fees referred to above are in part used directly to make available a comprehensive programme of support and compliance measures to ensure public funds are protected and used effectively.

All complaints and appeals will be logged in the Subcontracts Complaints Log and managed in line with DNCG policies.

5.8 DATA PROTECTION

The College along with its subcontractors and partners, must comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). As the lead delivery organisation, the College acts as the Data Controller. Each subcontractor acts as a data processor for any personal data processed in connection with their services.

The College must ensure that the relevant subcontracting document contains a UK GDPR-compliant Data Processing Agreement (DPA) mandating strict written obligations for security, confidentiality, and audit rights.

Subcontractors must ensure that the transmission of personal data (either to the College or to a third party pursuant to the relevant subcontract) is undertaken on a secure basis. Furthermore, protocols must ensure that once the subcontractor no longer requires the personal data for the agreed purpose, it is securely and permanently deleted.

All subcontractors are required to strictly adhere to our Information Security Framework and overarching Data Protection Policy. To ensure comprehensive understanding and alignment with our standards, subcontractor personnel handling personal data on our behalf must participate in our mandatory GDPR training programme.

Where subcontractor personnel require access to our systems and communication infrastructure, a formal Non-Disclosure Agreement (NDA) must be executed prior to any access being granted.

Any actual or suspected personal data breach must be reported immediately and without undue delay. Breaches must be reported via the Data Breach Report Form on the Data Protection SharePoint site, or directly to the Data Protection Team at dataprotection@dnccolleges.ac.uk if SharePoint is unavailable.

5.9 SAFEGUARDING

The sub-contractor is responsible for:

- Adhering to the College's Safeguarding and Prevent related policies and procedures including any amendments or updates made within the duration of the sub-contract.
- Notifying the College of their Designated Safeguarding Lead or nominated person with responsibility for safeguarding.
- Participating in safeguarding training and any additional training requirements as directed by the College, in particular training on College safeguarding reporting systems.
- Reporting through to the College as per procedure, any safeguarding related concerns, including the actions taken by the sub-contractor to support and safeguard the student.
- Notifying the College if any student is, or has in the recent past, received support from social care, in addition to any student who is a Looked After Child or Care Leaver, on a Child Protection Plan or identified on a Child in Need plan or receiving support from Early Help.

- Notifying the College if a student declares a criminal conviction and/or a pending investigation, to allow College risk management procedures as appropriate, including decision making around risk management.
- Notifying the College of relevant LADO and Person in Position of Trust (PiPOT) enquiries, concerns or referrals. 'Relevant' meaning where the individual concerned has contact, directly or indirectly, with our students.

6 Relevant Policies and Procedures

- 6.1 Financial Regulations
 Procurement Policy
 Anti-Fraud Bribery and Corruption Policy
 Quality Assurance of TLA Policy
 Quality Improvement Policy
 Safeguarding Child Protection and Prevent Policy
 Health and Safety Policy
 Data Protection Policy
 Data Sharing Policy
 Student Information Disclosure and Third Party Contact Policy

7 Who to Contact with Queries

- 7.1 The Projects and Contracts team should be contacted in the first instance for any queries in relation to this policy contracts.team@dncolleges.ac.uk

8 Communication

- 8.1 This policy will be routinely communicated to, and discussed with, current subcontractors as part of the contract review process.

This policy will also be communicated to potential subcontractors as part of the procurement process.

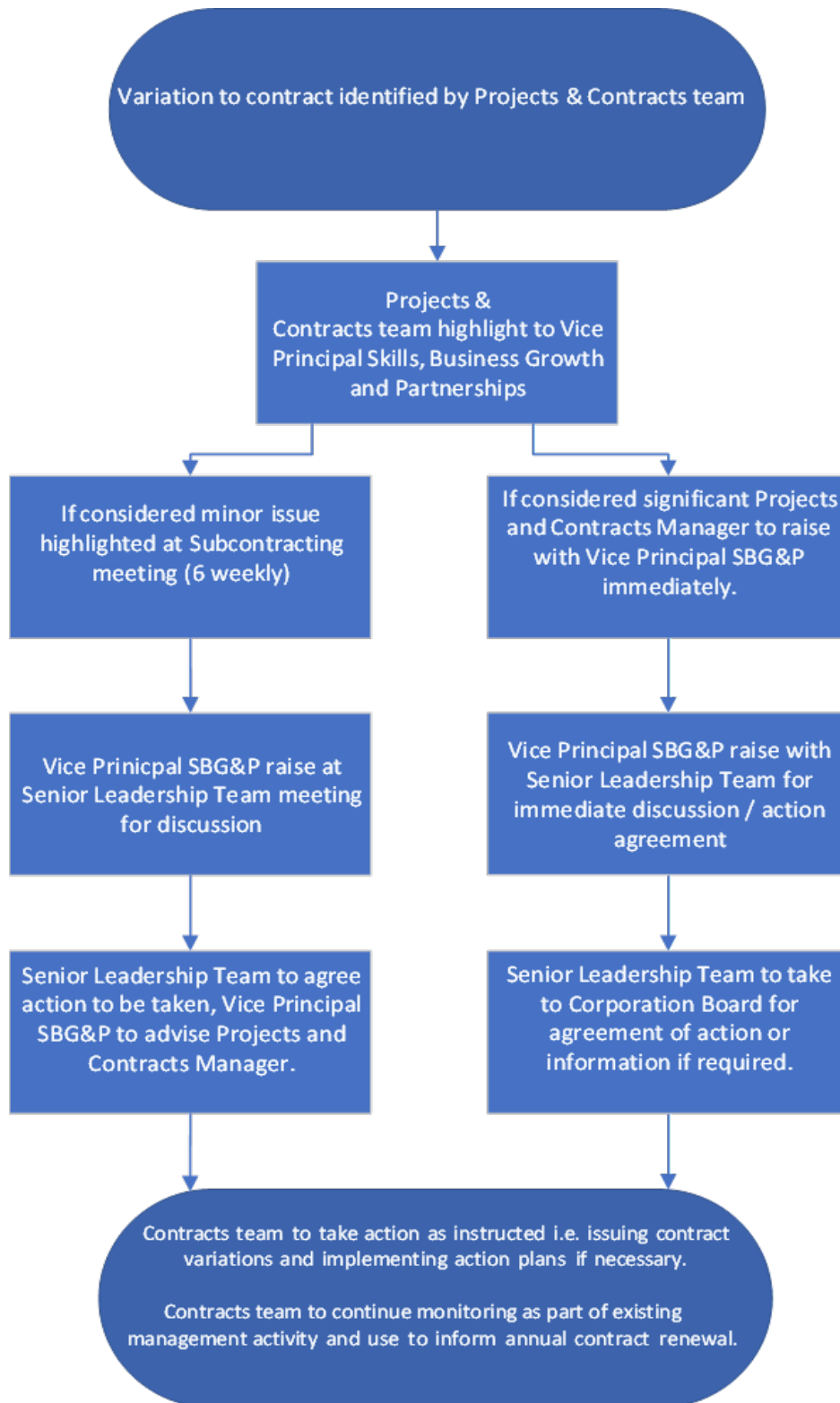
The policy will be published on the DNCG staff intranet and website.

9 Authorisation

Policy Holder:	Chief Operating Officer – Finance & Infrastructure
Union Approval & Date:	N/A
SLT Approval & Date:	24 June 2026
Governor Committee/ Board Approval:	Finance & Resources Committee – 29 June 2026
Next Review Date:	June 2029

Contract Change Process for Subcontractors

To minimise variations to contracts DNCG's policy dictates that all subcontracts are reviewed and issued annually. The below process will be followed should any reason for contract change or variation be identified in-year.



Reasons for contract change include but are not limited to; underperformance, overperformance, quality, loss of APAR, Health and Safety, financial difficulty of subcontractors, major Safeguarding concerns.

Examples of minor contract change:

Request for contract value increase of 5% or under

Request to add qualification to contract

Safeguarding risk identified; if found compliant following investigation

Quality concerns identified; if found compliant following investigation

Examples of major contract change:

Contract value significantly underachieved or request for increase of over 5%

Request to change delivery to a curriculum area not identified as a priority area

Safeguarding risk identified; concern upheld following investigation

Quality concern identified; concern upheld following investigation

Subcontracting Framework for Joint Working

Introduction

This framework aims to establish a collaborative approach between DN Colleges Group and its subcontractors to enhance efficiency, communication, and outcomes. By delineating responsibilities, expectations, and avenues for cooperation, this framework in line with individual contracts, seeks to foster a mutually beneficial relationship between both parties.

DN Colleges Group is responsible for the leadership and management of subcontracted provision. Provision must meet College expectations in terms of quality and outcomes and be managed in line with all College departments, teams and staff including provision to College CPD opportunities. Both parties shall actively engage in identifying opportunities for process enhancement, innovation, and best practice sharing.

Objectives:

- To optimise resource utilisation and service delivery.
- To enhance communication channels for effective collaboration.
- To ensure alignment with the DNCG's strategic objectives.
- To continuously improve processes and outcomes through shared learning and feedback.

Communication Protocols:

- Regular meetings shall be scheduled between college representatives and subcontractors to review progress, discuss challenges, and identify opportunities for improvement.
- The designated point of contact shall be established on both sides to facilitate communication and coordination, at DNCG this sits with the Projects and Contracts team in the first instance.
- Communication channels, including email, phone, and any data sharing platforms, shall be clearly defined and utilised for efficient information exchange.

This framework, in conjunction with the individual contracts, sets forth a structured approach to collaboration between DN Colleges Group and its subcontractors, with the overarching goal of enhancing performance, fostering innovation, and achieving shared objectives. By adhering to the principles outlined herein and maintaining a commitment to open communication, accountability, and continuous improvement, both parties can work together effectively to deliver exceptional results.

Contracts Team Responsibilities

- Seeking Senior Leadership Team and Governors approval for all major subcontracting activity (including new contracts, contract renewals/variations)
- Follow full procurement process for any new subcontracting provision.
- Issuing of contracts annually to subcontractors
- Contract management including capturing evidence of operations e.g., PMR/operations meeting minutes, quality evidence including QIPs and observation reports.
- Holding agreed monthly contract management meetings. See Annex A for an example agenda to meet subcontracting requirements.
- Payment of subcontractors

- Ensuring due diligence of subcontractors takes place prior to contract being issued and is monitored regularly.
- Ensuring delivery of any requirements of the contract. This may include, for example:
 - Functional Skills
 - Delivery of an element of apprenticeship off-job training – at least 10%
- Ensuring the subcontractor meets funding requirements including the ESFA rationale for subcontracting.
- Ensuring learners are enrolled on approved funded courses as per the specific subcontractor contract (qualifications through the College awarding bodies or subcontractor qualifications with their awarding bodies)
- Ensuring course planning including course code set up is completed.
- Ensuring subcontractors access to College mandatory training modules and CPD opportunities throughout the year.
- Ensuring subcontractors are trained in and given access to College systems as required. Including:
 - Prosolution and any products in the Pro suite
 - Smart Assessor for Apprenticeships
 - CPD platforms
 - Other College IT platforms as required.
- Ensuring the provision meets quality requirements and standards ensuring the College quality team performs regular reviews e.g. quality of delivery, staff observations, quality audits, SAR/QIP completion and QIP delivery.
- Ensuring the subcontractor manages provision in line with College requirements and procedures including:
 - Initial assessment
 - Enrolment
 - Delivery
 - Assessment
 - Additional Support
 - Smart Assessor completion
- Ensuring evidence and information is captured as required to ensure compliancy with ESFA subcontractor management requirements.

Curriculum Responsibilities (AEB, Apprenticeships, FE, HE)

Sub-contracted provision is to be treated as a department/team within the College with the same expectations of leadership, management, delivery, quality and achievements. Key curriculum operational responsibilities include

- Ensuring the College delivers any requirements of the contract. The contracts team will confirm specific contractual obligations. This may include:
 - Functional Skills
 - Delivery of an element of apprenticeship off-job training – at least 10%
- Ensuring any operational management concerns are raised to the Projects and Contracts team in a timely manner to inform future and current contracting, including retention of subcontractors and contract adherence to ESFA regulation requirements.
- Ensuring the provision is managed in line with funding requirements including holding regular meetings. See Annex A for an example agenda to meet subcontracting requirements.
- To approve enrolments and withdrawals and notify the Projects and Contracts team to ensure correct payments are made to subcontractors.
- Ensuring PMR minutes and any quality information is shared with the Projects and Contracts team for contract management evidence required by the ESFA.

Quality Department Responsibilities

- Ensuring the subcontractor meets College expectations as any other department in College.
- Ensuring regular quality activities are programmed in across the year including staff observations and providing constructive feedback.
- Ensuring SAR/QIP expectations are met by the subcontractor.
- Providing the contracts team with evidence during the year of quality activities undertaken e.g. copies of observations, SARs, QIPs.
- Conducting learner surveys with all subcontracted provision and providing feedback to Projects and Contracts Team/subcontractors.
- Ensuring any quality management concerns are raised to the Projects and Contracts team in a timely manner to inform future and current contracting, including retention of subcontractors and contract adherence to ESFA regulation requirements.
- Quality management includes observations on all sites, particularly when subcontracted at employers' sites.

Senior Leadership Team

- Confirm agreement to go to tender for new subcontracting provision.
- Discussion of/agreement to take to Corporation Board for final approval; new subcontracting contracts, annual renewal of existing contracts including values for the following academic year, Subcontracting Fees and Charges Policy.
- Signing of subcontracting contracts (CEO).
- Regular monitoring of subcontracting performance as informed by the Contracts team.
- Approve and sign variations of contracts, to include the cancellation of contracts, as and when required (CEO).

Corporation Board

- Final approval of; new subcontracting contracts, annual renewal of existing contracts including values for the following academic year, Subcontracting Fees and Charges Policy (Finance and Resources Committee)

Subcontractors

- Fulfil all obligations and responsibilities as defined in the contract issued at the start of the subcontract.
- Provide learning programmes on behalf of DNCG in line with the Contract and funding rules.
- Submission of learner enrolments and supplementary documentation as required in a timely manner.
- Provide information requested by DNCG as part of the due diligence process and ensuring that any due diligence requirements are kept up to date and in line with contractual obligations. Informing DNCG of any changes of ownership of the organisation, management structure, loss of accreditation and/or direct claim status.
- Attending regular meetings as agreed with DNCG Projects and Contracts team and Curriculum teams providing updates as required on key performance and monitoring areas. See Annex A for an example of a meeting agenda to meet subcontracting requirements.
- Give reasonable access to premises and documentation for the purpose of quality assurance to DNCG staff, including taking part in observations and providing SAR/QIP's.

- Be familiarised with the ESFA Funding Rules (and, where appropriate, Apprenticeship funding rules) and ensure systems and processes enable full compliance.
- Comply with and participate in an Ofsted inspection as and when DNCG is subject to one providing further documentation if required.
- Comply with and participate in an Assurance Review of subcontracting standard as and when DNCG is subject to one providing further documentation if required.
- Conduct regular CPD in line with DNCG's mandatory training guidelines.
- Inform learners of the contractual arrangements of the subcontract and encourage their participation in quality monitoring activities including surveys when required.
- Maintain open lines of communication with DNCG and promptly address any issues or concerns.

Example meeting agenda to meet subcontracting requirements to include:

- Starts and Leavers
- Training Plans
- Learner Progress
- Learner support and access to College services and support
- Achievements
- Quality
- Issues
- Learner Support
- H&S e.g. report of any accidents
- Equality and Diversity
- Safeguarding
- Subcontractor Staff Development
- Course Management including attendance
- Pro-systems access and use
- Teaching and Learning