Subcontractor Policy

LANCASTER & MORECAMBE COLLEGE

Date: August 2025

Lancaster & Morecambe College

Policy name: Subcontractor Policy

Policy Owner:	Vice Principal: Finance and Resources
Date of Review:	August 2025
Date Approved:	August 2025
Next Review:	August 2026
Responsibility for Review:	Vice Principal: Finance and Resources
Policy Review Frequency:	1 year
Applicable to staff:	Yes
Applicable to students:	No
Published on website:	Yes
Published on intranet:	Yes
Notes:	

SUBCONTRACTOR POLICY

Introduction

The College adopts a low risk approach to subcontracting and as such will only contract with a small number of well established, good quality providers that will enhance our provision.

The purpose of this procedure is to ensure, subcontracted provision delivers good quality teaching, learning and assessment and complies with the associated funding requirements.

The Business and Educational Case for Subcontracting

The College will only subcontract in cases where,

- The provision is of a specialist nature and the College does not have the facilities or staffing expertise to deliver inhouse.

- The provision enhances opportunities available for learners and supports better geographical access. The provision will give learners improved opportunities for career progression.

- The College will in all instances comply with the DFE subcontracting rules and will not subcontract more than 25% of funding or learner volumes in any one funding stream.

Contracting Arrangements and Responsibilities

The Vice Principal – Finance and Resources will be responsible for contract management and oversight of subcontracting agreements.

The Vice Principal for Progress and Performance will be responsible for ensuring the quality of education and training provided by the subcontractor and performance management.

The Vice Principal's are both experienced in managing subcontracting arrangements and have a detailed knowledge of the DFE contract and funding rules.

The Corporation will monitor, review and annually approve the Colleges subcontracting arrangements.

Each subcontracting arrangement will be covered by a formal contract that will include,

- Performance management measures
- Monitoring and Evaluation processes.
- Problem resolution processes.
- Termination clauses.
- Contact points at both the College and Subcontractor.
- Payment mechanisms and profiles.
- Details of the fees and charges applicable.

Relationship Management

The College will undertake annual checks on sub-contractors including,

- Current ownership and control
- Current / latest financial health
- Review of learning activities and compliance
- Contingency plans.

Formal and informal meetings will be held throughout the year with subcontractors at which performance against contract and other contractual issues will be discussed.

Managing Performance, Quality and Compliance

Regular and substantial quality checks on delivery should be undertaken and must include at least one visit to the subcontractor's place of delivery each year. Where provision is delivered through distance learning and a physical visit is not possible then checks will be undertaken remotely.

The visit(s) must include checks of learner existence and eligibility and at least one observation of teaching and learning and/or assessment. Where any substantial concerns are identified a second observation must take place. If assessment is written/portfolio based, checks should be undertaken as appropriate and these should include a sample of internal verification.

Checks should be undertaken to ensure the quality of the information and guidance provided to learners meets the College's expectations. This should include an observation of advice and guidance being delivered.

Findings from the visit(s) should be recorded with actions to be taken if appropriate. The Quality Audit Checklist (Appendix 1), should be completed for all visits.

On occasions where all required checks are unable to be undertaken on a visit or where actions are identified, a second visit must be agreed within the contract period. A meeting schedule should be available and meeting minutes should be documented.

External quality assurance (EQA) procedures must be centrally managed by the appropriate College person(s), including associated exams and registration procedures.

The contract manager must ensure appropriate safeguarding procedures are in place at each subcontractor. This should include evidence that checks have been conducted, including sufficiently checking the subcontractor's Prevent and Safeguarding strategy and obtaining details of delivery staff and their DBS numbers, which must be recorded and filed appropriately.

Checks should include appropriate entry criteria and interview processes, accurate duration of the training and employment, initial assessments, delivery and planning materials and that learner reviews are being undertaken in line with the College' guidelines.

For all subcontractors, there must be a contingency plan that outlines the key steps to be taken if a subcontractor fails to deliver.

This should include as a minimum,

- Contact the provider to ensure learner records are retained
- Contact the learner(s) to ensure they are still in learning
- Remain in contact with learners to keep them informed of the situation
- Outline details of alternative provision, including in-house provision, that can be utilised to ensure that learners are able to complete their programmes.

Quality Monitoring, Audit and Compliance Evidence Requirements

The Vice Principal for Progress and Performance is responsible for ensuring delivery through subcontractors meets College expectations and maintaining evidence that these checks have been completed.

For each subcontractor a monitoring file must be maintained that as a minimum contains the following.

1. A copy of the subcontractors Safeguarding and Prevent Policies with evidence of review.
2. A schedule of all subcontractor staff that will be delivering on the contract with DBS numbers were applicable.
3. A schedule of announced and unannounced visits planned for the current academic year.
4. Minutes of meetings held with subcontractors.
5. Records of quality monitoring and assurance visits with action plans and lesson observation reports.
6. A contingency plan detailing the actions to be taken in the event a subcontractor fails and is unable to deliver its contractual obligations.

College Records to be held by CIS

These documents should be audited with the CIS team

Full Audit Checks (mixture of continuers, completers and withdrawals):
• *ILR* • *Student Declaration of eligibility* • Literacy and Numeracy Assessment • *Completion / Withdrawal forms* • *Copies of certificates* • *Learner Attendance Log/Register (final)*

Appendix 1

QUALITY AUDIT CHECKLIST FOR SUBCONTRACTED PROVISION

Company Name:		Staff Name:
College Meeting / Site Visit (please circle)		

Items Audited	Date completed	Compliant (✓ / x)	Evidence	Actions (if applicable)
ILP completed				
Learner reviews / reports completed				
Appropriate documentation available for delivery of programme (e.g. SoL is fit for purpose against the specification being delivered, assignment briefs fit for purpose etc.)				
Learner work available for audit (state what type of evidence was audited)				
IV of learners' assessment is available				
Check any EV / SV reports, details of planned visits and action plans in place for any recommendations (check college holds all documentation)				
Undertake observation of teaching and learning / walk through (and / or planned dates)				
Agree plan of meetings / visits for academic year (ensure minutes of meetings between college and subcontractor)				
Perform Learner existence checks				

Part 1 : Initial Screening for
Equality Impact Assessment (including Safeguarding)

To be completed prior to a Policy, Plan or Procedure being introduced/reviewed

Name of Policy/Plan/Procedure being assessed: Is this a new or existing document? Existing X New	Name of Manager/Group carrying out the assessment: Peter France – Vice Principal Finance and Resources
1. In which of the listed areas could the new/amended policy, plan or procedure have an impact? These areas follow the College SES NB: This could be positive as well as negative. (please tick box)	□ Gender □ Race and Ethnicity □ Disability □ Sexual Orientation □ Age □ Religion/belief □ Socio-Economic □ Pregnancy/Maternity □ Gender Reassignment □ None expected □ Marriage/Civil Partnership □ Complies with Children & Families Act 2014 □ All of the above
2. What are the risks of introducing this policy/change to any of the above groups?	None identified
3. What are the expected benefits of introducing this change to any of the above groups?	All groups will benefit from the policy which sets out requirements for quality monitoring in subcontracted provision.
4. Are there any areas or issues that could impact on the safety of staff or learners?	N/A
5. What evidence do you have for your responses to Q 2, 3, and 4? e.g. evidence could be provided to counteract identified risks and therefore a full screening would not be required.	N/A
6. Is this policy/change deemed to have a High, Medium or Low risk?	Low
7. Is there any further action to be taken as a result of completing this screening form? *For example, a need to complete a full Equality Impact Assessment or to set the date of a review*	Is a full screening Impact Assessment required? Yes □ No x If yes, please move to complete Part 2 overleaf
Date of Review: 06/06/2024	
Date of completion of Impact Assessment: 06/06/2024	
Signed (completing Officer) Peter France Job Title: Vice Principal – Finance and Resources	