

Sub-Contracting Guide 2021-22

Overall responsibility: Deputy Principal of Finance & Corporate Affairs
Implementation: Steve Rankine
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Pat Brennan-Barrett

Principal

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1. INTRODUCTION

This guide gives an overview of each section of our Subcontract Management Framework. This framework has been established to help us work effectively with our Partners in a fair and transparent way. The aim of the framework is to set a consistent standard for the management of Partners

Our Mission: To enhance the lives of our students and other customers, maximising their potential through learning

Our Values

- Respecting and helping each other
- Engaging people through teaching with expertise and enthusiasm
- Developing people through learning
- Bringing out the best in each other
- Playing a positive role in our community

As a partner of Northampton College we expect you to contribute to our vision, mission and values. You can also expect in your dealing with us that our team members display in their behaviours their commitment to the above.

2. REASONS FOR SUB-CONTRACTING

The College seeks to develop subcontract relationships with other providers who can complement our existing provision and offer high quality learning and development to students and employers. Subcontracting helps us to engage with new markets and be more responsive to student and employer needs. Subcontracting is often a way for the College to develop its own provision and develop its own capacity and capability. The College has excellent Quality Assurance and Quality Improvement Processes that will help improve the quality of provision and have a positive impact on our subcontractors and students.

3. ROLES AND RESPONSIBILITIES

Name	Job Title	Roles and Responsibilities	Contact Details
Pat Brennan Barrett	Principal	Chief Executive	Pat.bb@northamptoncollege.ac.uk
Nicky Johnson	PA to Principal	PA to Principal	Nicky.johnson@northamptoncollege.ac.uk 01604 734055
Patrick Leavey	Deputy Principal	Overall responsibility for all College Provision	Patrick.leavey@northamptoncollege.ac.uk 01604 734296
Steve Rankine	Deputy Principal Finance & Corporate Affairs	Senior Manage for Subcontracting	Steve.rankine@northamptoncollege.ac.uk 01604 734380
Carol Meadows	Director of Management Information Services	Funding, Documentation, Compliance and Data Protection	Carol.meadows@northamptoncollege.ac.uk 01604 734088
Jenny Thorpe	Assistant Principal Teaching, Learning & Quality	Quality of provision	Carole.Martin@northamptoncollege.ac.uk 01604 734001

4. DUE DILIGENCE

The Due Diligence process is completed with all potential partners before awarding a contract to deliver on our behalf. There will then be an annual update of the due diligence process in the spring for existing partners who

wish to secure new funding for the academic year ahead. Northampton College will undertake financial viability checks on all of our partners in at least six month intervals.

At the start of any Subcontract a selection of suitable performance measures are identified. They will be a mixture of quantitative and qualitative measures that provide a balanced but robust view of how you are performing and have performed historically, enabling a risk measure of Red, Amber and Green to be applied on a monthly basis.

The measures considered at the start of the contract year and on an ongoing basis which will include the following but not limited to:

- Profile of delivery against contract value
- Financial Strategy
- Success rates
- Retention rates
- Accuracy of data return
- Learner and employer feedback
- Quality of teaching and learning
- Learner progress and tracking
- Any other performance matters

The risk rating can change at any point in the year dependant on any changes to the performance measures noted above. Should the risk rating be increased partners will be informed at the contract review, if performance improves the risk rating may be reduced in year. If improvements are not made it, may be deemed appropriate to terminate the contract. The management fee may change to reflect the additional intervention and support required to bring about improvements.

The RAG rating will indicate the level of extra intervention and support that will form part of the Quality Monitoring time table:

- Green – Performing well across all measures. Requires standard support.
- Amber – Performing at a level that requires additional support in the year ahead.
- Red – Performing at a level that requires significant support.

5. ON BOARDING

Once a potential partner has successfully completed and passed Northampton College's due diligence process, a contract can then be drawn up and awarded. The contract value is dependent on the funds available. The Deputy Principal Finance and Corporate Affairs of Northampton College has final sign off of the maximum contract value to be awarded, which is considered in accordance with the profile the partner has submitted. Once a value has been agreed the Deputy Principal Finance & Corporate Affairs will then issue contracts to the partner.

The next stage is to arrange an 'on boarding' meeting with Northampton College's Director of MIS and Assistant Principal Teaching, Learning and Quality to gain an understanding of paperwork and quality processes which are to be adhered to.

6. HEALTH AND SAFETY POLICY AND DOCUMENTATION

Northampton College is committed to fulfilling its legal obligation under the Health and Safety at Work Act (1974) and all associated legislation and requires all delivery partners to do the same. All delivery partners are required to have and implement a Health and Safety Policy.

Northampton College will need copies of the following documentation as part of due diligence and from time to time request updates to be held on file at Northampton College. It is a requirement that all of the below are current and updates annually.

- Public Liability Insurance
- Professional Indemnity Insurance
- Employers Liability Insurance
- H&S Policy
- Risk Assessments
- Display of the Health & Safety Law poster
- Fire Safety Risk Assessment and Policy
- Fire Fighting Equipment
- PAT tested Equipment
- Equipment must be Maintained in a Safe Condition
- Accident/Incident book and reporting procedure
- Records of Fire Evacuation Drills

7. EQUALITY AND DIVERSITY

Each delivery partner must provide Northampton College annually with copies of their Equality & Diversity Policy and related procedures. Northampton College will review all related documentation and the delivery partner must act upon feedback provided.

The Equality & Diversity Policy is intended to influence all stakeholders and delivery partners and it both underpins and informs the way we aspire to work. Stakeholders and delivery partners include all staff, collaborating employers, learners and those contracted by us to assist in the delivery of quality learning provision.

Delivery partners must comply with all current legislation on all aspects of equality of opportunity and follow the principles of the common inspection framework in promoting equality and diversity in minority and underrepresented groups.

Partners are encouraged to provide training to all staff and focused equality and diversity training to delivery staff on embedding into their delivery.

8. SAFEGUARDING AND PREVENT

Northampton College is committed to creating and maintaining a safe environment for young people and adults at risk and ensuring that action is taken to support them if abuse is suspected. Northampton College requires all staff and delivery partners to share this commitment and will expect all relevant staff to undertake training at an appropriate level for Safeguarding and Prevent.

Each delivery partner must provide Northampton College with copies of their safeguarding policy and Prevent Policy and any related policies, procedures and guidance documents. Northampton College's Safeguarding and Prevent Designated Officer will need to review all related documentation and approve their use and suitability; the delivery partner must liaise and inform the Designated Officer if any potential safeguarding and Anti Radicalisation issues are identified. If the delivery partner does not have appropriate policies, they must put in writing that they comply with Northampton College policies and procedures.

Northampton College accepts its legal and moral obligation and expects its delivery partner to ensure the same thus providing a duty of care to protect all children, young people and adults at risk, who are either learners, registered on Apprenticeship programmes, training programmes or are employed by a delivery partner. Partners must safeguard their welfare, irrespective of race, disability, gender, age, religion or sexual orientation, in line with Single Equality Legislation, The Children's Act 1989 and 2004 and the Governments Prevent Agenda. The topics of Safeguarding and Anti Radicalisation should be covered at learner's inductions and all staff should be vigilant at all times. Northampton College will support partners in training staff and complete role assessments. To this effect all staff must be subject to DBS disclosure and are required to work within guidelines on setting and maintaining professional boundaries. All delivery partners must provide DBS reference numbers and the date and the DBS check took place to Northampton College. Northampton College will require access to your DBS register on request, all staff must be DBS checked when taking up position with the delivery partner and it is recommended the DBS checks are renewed every 3 years.

All staff who have direct contact with young or vulnerable learners will need to have received Prevent and Safeguarding training as relevant to their role and responsibilities as agreed by Northampton College. Northampton College are be able to provide information on available training, either provided by Northampton College or externally. The Quality Monitoring processes will track the CPD of the delivery staff and collect ongoing evidence of annual updates.

9. DATA REQUIREMENTS

It is important that paperwork is returned promptly and correctly completed. Northampton College's requirements will be set out at the on-boarding meeting. It is important that prime contacts for data and paperwork are established so that communication can be swift and efficient. Paperwork will only be processed by Northampton College when it is complete and has been correctly completed. Late submissions and incomplete and incorrectly completed paperwork will result in delays in payment.

Subcontractors may be required to attend a monthly data exchange meeting. The purposes of these meetings may include the exchange of paperwork, reconciliation of learner lists, discussion of profile, and correction of amendments. Paperwork must be received at least 5 working days before the ILR submission date to be included in that months ILR return. Each month subcontractors will receive a PO (detailing the payment due for the month) with a PFR extract showing all in year learners within 5 working days of the College's final ILR return for the month. Subcontractors will be paid on the last day of the month. However non-receipt of contact logs, progress reviews etc. or outstanding corrections my result in payments being withheld.

Subcontractors are required to abide by the ESFA funding rules and provide their ILR or the data for NORTHAMPTON COLLEGE to complete on ILR according to the ILR specification.

All partners will be required to sign a Data Sharing Agreement (available on College Document Library)

ESFA funding rules 2020-21

<https://esfahelp.education.gov.uk/hc/en-gb/articles/360015594659-ESFA-Funding-Rules-for-2020-to-2021>

10. PERFORMANCE REVIEWS

Northampton College minimum levels of performance are set within each delivery partner's contract. These are reviewed throughout the year at Performance Monitoring meetings, which occur 5 times a year.

The standard agenda items for each contract review are noted below:

- Review of Project
- Recruitment & Induction
- Learner Progress & Attendance
- Early Leavers, Retention, Achievement
- Maths and English
- Learner / Employer Feedback and Complaints
- Observations T,L,A
- Compliance & Audit
- Development Plans
- Contracts, Claims, MIS, Finance
- Policy & Procedural Updates
- AOB
 - Health & Safety and Safeguarding
 - Equality & Diversity
 - Support Requests
 - Training and CPD

11. QUALITY ASSURANCE

The primary objective of Quality Assurance is to enable continuous improvement through a process of self-evaluation and action planning. Northampton College strives to and expects its delivery partners to aim for continuous improvement in the quality of all aspects of its work, operation and delivery as part of our commitment to help learners and employers achieve their learning goals.

Northampton College and its delivery partners must satisfy the requirements of the Common Inspection Framework for Further Education and Skills 2019 and will be expected to read, adhere and implement all aspects of the CIF. Delivery partners must also satisfy any requirements of any other regulatory body from time to time which apply to the contracted activities.

Each delivery partner will need to contribute to the Northampton College Self-Assessment Report and Quality Improvement Plan annually. The information for the SAR and QIP for the provision it delivers through Northampton College must be forwarded to Northampton College within the timeline detailed in the Quality Cycle, in order for it to inform Northampton College overall SAR and QIP. Delivery partners may use their own SAR and QIP pro forma if agreed by the quality team, or use the pro forma supplied by Northampton College. All parties will receive feedback following a review of the supplied SAR and QIP.

Where delivery partners are direct contract holders they must inform Northampton College of any impending Ofsted inspections and ensuing result.

11.1 Quality Control Measures

Subcontract provision will be subject to rigorous quality control measures. These may include

- **Delivery observations;**
 - subcontractor will provide details of all delivery sessions including dates, times and locations.
 - NC Quality unit will attend, unannounced a sample of these sessions to observe the quality of the delivery. This will be assessed using the College's standard observation processes.

- NC Quality Office will maintain records of all observations and share these with the subcontractor
 - Any issues will be immediately fed back to the subcontractor and actions agreed to address these
 - NC Quality Office will feed back all results to the Subcontract Manager to be discussed at the Subcontractor Meeting
 - A sample of delivery sessions will be observed early in the project and subsequent observations determined by the results of the first sample
- **Attendance at sign up / enrolment events**
 - Subcontractor will provide details of all sign up / enrolment sessions including dates, times and locations.
 - A sample of these will be observed by NC Quality Unit
 - The quality of IAG given will be assessed, including to ensure that students know they will be students of Northampton College
 - Any issues will be immediately fed back to the subcontractor and actions agreed to address these
 - NC Quality Office will feed back all results to the Subcontract Manager to be discussed at the Subcontractor Meeting
- **Samples of Work and Assessments**
 - Samples of work and assessments can be requested by the NC Quality Unit to ensure that work is being properly marked and feedback given.
 - The overall purpose will be to assess the quality of delivery and that students have been placed on an appropriate level and qualification
 - Any issues will be immediately fed back to the subcontractor and actions agreed to address these
 - NC Quality Office will feed back all results to the Subcontract Manager to be discussed at the Subcontractor Meeting
- **Student Feedback**
 - The subcontractor will collect student feedback and communicate this to NC Quality Unit
 - NC Quality Unit will conduct independent student feedback; this may be by telephone or face to face.
 - NC Quality Unit will conduct a sample of Exit Reviews
- **Complaints and Comments**
 - The subcontractor must have in place a complaints and comments feedback mechanism for the provision
 - This must be clearly communicated to all students
 - Subcontract students must also be given contact details of the NC Quality Unit to enable complaints and comments to be fed back directly to NC
- **Data returns will be required to be made on a timely basis to SDS at NC**
 - The following will be indicators of poor quality and will require action plans to rectify:
 - Late returns of paperwork (enrolments, attendance data, completions and certification)
 - Significant numbers of withdrawals (> 3%)
 - Significant numbers not achieving (>3%)

11.2 Continued Professional Development & Staff Development

It is the responsibility of the delivery partner to use competent and appropriately qualified staff and to ensure that relevant CPD and appraisal is maintained and recorded. All staff must be involved in an annual appraisal and CPD programme and the delivery partner should be prepared to share this information with Northampton College and/or show evidence of the CPD programme duty reviews. Northampton College insist on mandatory training on safeguarding, Prevent and Equality and Diversity annually.

11.3 Information, Advice and Guidance

The Skills Funding Agency requires all Contractors to hold or be working towards The Matrix Standard or use the services of another partner that holds Matrix accreditation to deliver information, Advice and Guidance to learners.

The Matrix must be obtained within 12 months of being awarded a contract unless it is the main objective of the contract. Then this must be achieved within 6 months. Partners who have accreditation IAG must be recorded and delivered before learning begins, throughout the programme of learning and at the end of programme.

11.4 Learner and Employer Feedback

All learners and employers are requested to provide feedback on the service they receive. All delivery partners in accordance with the quality cycle must analyse the data captured and use the evidence to inform their planning and quality improvement. Copies of survey analysis must be supplied to the quality team during quality monitoring review visits. In the first month telephone surveys will be conducted with learners and employers to gather first stage feedback.

11.5 Complaints Handling

It would be expected that the delivery partner has a complaints procedure which is clearly explained to all relevant stakeholders. These documents are auditable by Northampton College. Any complaints or feedback received should be reported to Northampton College quality department within 5 working days of receiving them, together with notification of action taken or the action planned in response.

11.6 Learner Appeals

It is required that each delivery partner has a learner appeals procedure and that the process is explained to all learners at the beginning of every assessment visit, these documents are auditable. Any learner appeals or feedback received should be reported to Northampton College within five working days of receiving them, together with notification of action taken or planned in response.

11.7 Audit Requirements

Northampton College, its representatives and any external organisation appointed by Northampton College shall be entitled to audit the delivery partner, to check, monitor and observe the performance of the provider.

The following are auditable:

Documents pertaining to centre:

- Self-Assessment Report
- Quality Improvement Plan
- Policies and Procedures
- Health & Safety
- Insurance
- Equality & Diversity
- Management Information Systems, Tracking and Monitoring
- Awarding Organisations documentation
- Financial records

Documents pertaining to staff:

- Recruitment Records
- CPD

- CVS
- Induction
- Appraisals
- Policies and Procedure
- Observations
- DBS Records
- Associate relationships with the subcontractor

Documents pertaining to employers:

- Contract/Agreement
- Insurance
- Health and Safety
- Staff/apprentice ratio or Staff / student ratio

Documents pertaining to learners:

- IAG
- Recruitment
- Induction
- Initial Assessment
- Planning Learning
- Visit reports and learning logs
- Progress Reviews
- Teaching, Training, Assessment, Verification and Certification

This may not be an exhaustive list and is subject to review/change according to the current funding requirements and legislation.

11.8 Observation of Teaching, Learning and Assessment

New partners will be observed within the first month of the contract. Each delivery partner must facilitate observations of internal Tutors and Assessors a minimum of once depending on the categorisation awarded. Should an outcome of below expectations be awarded a training plan must be in place and a target for re-observation agreed. Tutors and Assessors will be categorised in line with the Ofsted Common Inspection Framework criteria and will be given feedback and where appropriate a development action plan to move forward to the next category.

Observations must be undertaken by trained observers using suitable and agreed planning and recording documentation.

Verbal feedback will be given to the tutor by the observer at the time of the observation and a written record must follow within 15 working days. This must be given to the tutor and a copy retained by the delivery partner for their records and made available during audits.

Northampton College observers will conduct observations alongside receiving the partners own observation records, which will be planned based on a risk approach and/or your current status in relation to developing your own observation infrastructure. Both will be used to inform the quality of teaching and learning for the partners and the provision overall.

It is a requirement that Observation records are moderated on an annual basis as a minimum. This can be undertaken internally by the delivery partner with findings available at audit, or alternatively the delivery partner can be supported/moderated by Northampton College.

12. ASSESSMENT, VERIFICATION AND MODERATION

It is imperative delivery partners take all necessary steps to meet and maintain the requirements of all scheme approvals. Northampton College will require evidence that this is the case and the evidence will need to be available at audit.

Northampton College will collect copies of recent external verification reports during quality monitoring visits.

Evidence of scheme approval must be provided at audit. Any new curriculum areas that the delivery partner wishes to deliver must be discussed at the contract review meeting prior to approval being provided.

13. STAFFING

Northampton College requires a list of the roles and responsibilities for key staff in order to contact and liaise with the correct person. If there are staffing changes Northampton College will require to be kept informed in a timely manner and provided with DBS and CV information. Appointment of new staff will trigger the requirement for mandatory training on safeguarding, Prevent and Equality and Diversity.

14. MEETING ATTENDANCE

The key contact from each delivery partner is expected to attend monthly MIS meetings. Additionally there will be “keeping in touch meetings” throughout the year along with performance reviews and audits which will be arranged at a mutually convenient time between Northampton College and the delivery partner.

15. ESF/ESIF

Northampton College have a contract with ESFA to deliver training and support with funding from the adult skills budget, ESFA will use the activity in their match pool for the ESF programme 2014 to 2020. We will select eligible activity from the match pool.

We are required to inform our subcontractor partners to inform learners that they are on a programme funded by ESFA, which the ESFA could use as match funding. They are required to keep all learner data and documents until the end of the document retention period for the 2007 to 2013 ESF programme (at least until 31 December 2022), for the 2014 to 2020 Programme (at least until 31 December 2030).

Documentation must keep to the ESFA logo and design guidelines on all promotional materials or activities relating to delivering the contract, as set out on the ESFA website. You must display the ESF logo and references to financial support from the ESF when you describe or publicise any opportunities, activities and achievements. This includes, but is not restricted to, displaying them on:

- All information and publicity materials, including websites, communications sent over the internet, correspondence and literature used by participants.
- Advertisements, press releases and other media-targeted materials.
- All documents that are used with participants and partners, for example, enrolment documents, training materials, individual learning plans (ILPs), attendance records and internal certificates.
- You must display any ESF posters prominently at yours and subcontractors’ premises.
- You should be aware that the provision may be audited by agencies of or acting on behalf of the ESF Managing Authority or the European Commission (EC) after the delivery has finished.

- If you are chosen as part of an ESF audit sample – for either ESF or match provision – you must supply all the evidence to support ESF or match activity that external ESF auditors want to see.
- If you are chosen for an audit visit, you must allow external auditors into your premises and co-operate with the audit.

16. MEETING THE DEFINITION OF A QUALITY APPRENTICESHIP

All delivery partners delivering Apprenticeships must ensure that any learner that is signed up with them meets the following requirements:

- The Apprentice is in a real job, which allows the Apprentice to gain the knowledge based element and real practical experience along with functional, personal skills which are required for their immediate job and future career. The Apprentice will acquire these through learning in the workplace and formal off the job training. The Apprenticeship undertaken must match the job role.
- On completion of the Apprenticeship the Apprentice must be able to undertake the full range of duties appropriate to the job.
- The delivery partner must work with employers to ensure that Apprenticeships are delivered to people to learn new skills whilst on the job.
- The delivery partner must ensure that all learners on an Apprenticeship are employed, work a minimum of 30 hours per week, unless the individual's circumstances or the particular nature of the employment makes this impossible. If so the minimum must be 16 hours and the duration of the Apprenticeship should be extended.
- The delivery partner must ensure that the duration of Apprenticeships rules are abided by 16-18 years olds must be on programme at least 12 months and one day those over 19 must be 12 months unless relevant prior learning is recorded. Where this is the case the Apprenticeship will not be less than 6 months. Apprenticeship delivery must be planned make full and effective use of the duration, including the opportunity for Apprentices to progress e.g. to offer L2 functional skills to up-skill the apprentice.
- All Apprentices must have an Apprenticeship Agreement.
- Apprenticeship funding must not be used to pay Apprentice wages, the primary function is learning. Where the delivery partner is the employer the delivery partner must be able to demonstrate that agency funds are not being used in this way.
- The delivery partners must ensure that all Apprentices are paid at least the applicable rate under the Apprenticeship National Minimum Wage (this will be dependent on the age of the Apprentice and the stage of the Apprenticeship) and ensure that all learners are provided with a written employment contract and are provided with itemised slips.
- All delivery partners must ensure that their delivery models are structured to deliver the SASE framework requirements.
- Any employer who the delivery partner does not feel is meeting the needs of a high quality Apprenticeship should be challenged or not engaged with.
- Upon completion of the Apprenticeship or at the point of withdrawal, delivery partners are required to track and monitor learner destinations with analysis of progression.
- 'Zero hour' contracts, which do not specify a set number of hours, will be accepted for Apprenticeships only if there is a contract of employment in place between the apprentice and the employer but where the working hours are not fixed. The number of hours worked each week and the pattern of working hours may vary (as long as it meets the requirements of relevant regulations) but there must be a clear undertaking between the employer and the apprentice to complete the Apprenticeship within the hours worked.

- Apprentices with an irregular working pattern must use a four week rolling average to make sure they keep to the employment hours funding rules.

17. APPRENTICESHIP STANDARDS

Delivery partners are expected to make the transition to new standards as soon as operationally possible.

Higher qualifications being profiled and delivered by delivery partners is actively encouraged where there is effective infrastructure to support this.

18. JARGON BUSTER

19. ALS	Additional Learning Support
AEB	Adult Education Budget
CPD	Continuous Professional Development
DBS	Disclosure Bureau Service
DL	Distance Learning
EDIM	Equality and Diversity Impact Measures
ESFA	Education and Skills Funding Agency
ESIF	European Social Investment Fund
ESF	European Social Fund
FL	Flexible Learning
HR	Human Resource
HSE	Health and Safety Executive
IAG	Information Advice and Guidance
ICT	Information and Communications Technology
IfL	Institute for Learning
IIP	Investors in People
ILP	Individual Learning Plan
ILR	Individual Learner Record
ILT	Information and Learner Technology
IQA	Internal Quality Assurance
IWB	Interactive Whiteboard
KPI	Key Performance Indicator
NC	Northampton College
LEA	Local Education Authority
MIS	Management Information System
NVQ	National Vocational Qualification
OFSTED	Office for Standards in Education
PAYE	Pay As You Earn
QIP	Quality Improvement Plan
SAR	Self-Assessment Report
SC	Skills Centre
SOW	Scheme of Work

Appendix 1: EQUALITY & DIVERSITY IMPACT ASSESSMENT

This template has been designed to help you take action to improve services and practices which affect staff, students and other service users at Northampton College. By completing this template, you would have considered the impact that your policy, practice or service might have on particular social groups within the college community. The exercise will also provide you with the opportunity to demonstrate, where possible, that the College promotes equity, diversity and inclusion.

Once this Equality Impact Assessment has been created, please include on the last page of your policy document.

Policy Details	
What is the policy?	Sub-contracting Guide
Is it new or existing?	Existing
Department	Finance & Corporate Affairs
Policy Author (postholder title, name)	Steve Rankine
Author of Equality Analysis	Steve Rankine
Date of completion	17/02/21

Aim and Objectives
Briefly describe the aims and objectives of the policy
To govern the taking on and managing of subcontractors

Policy Assessment				
Consider whether your policy might have an impact on various groups identified within the categories listed below and explain why you have reached this conclusion. Please tick (✓) the identified level of impact (positive, negative, or no impact) and provide details of your findings.				
	Positive Impact	Negative Impact	No Impact	Findings
Race			X	
Religion and/or belief			X	
Sex (Gender)			X	
Gender Identity			X	
Disability			X	
Age			X	
Sexual orientation			X	
Marriage and/or civil partnership			X	
Pregnancy and/or maternity (including surrogacy and adoption)			X	
Other identified group (e.g. carers)			X	

Action Planning		
How do you intend to mitigate or eliminate any negative impact identified?	If a positive impact is identified, how do you intend to promote or develop this opportunity?	Where negative impact has been identified, can it be justified? If so, explain how.

Monitor and Review
How will you monitor the impact of your policy once it has been put into effect?
The policy will be monitored through feedback from services users

Names and position of Impact Assessment Team (min of 3 preferably from areas across the College):	
Name	
Mark Owen	
Ashok Dave	

Equality Analysis Sign-Off Signature and Date:	17/02/21
Review Date:	

Appendix 2: DATA PROJECTION IMPACT ASSESSMENT

Data Protection Impact Assessment

Does this Policy

- require the collection and use of data in addition to that normally collected by the College?

No (if Yes complete Assessment point number 1)

- require the sharing of data with partners?

Yes (if Yes complete Assessment point number 2)

1. Is additional data being collected? If so please detail:

Is data collected personal and/or sensitive?

Yes – enrolment data

How will you collect, use, store and delete data?

Enrolment forms sent to the College; stored on Student record system

2. Will you be sharing data with anyone? Please detail what data, with who and confirm a **Data Sharing Agreement** is in place

Learning Curve collect data and share with the College – Data Sharing Agreement in place

Describe the purposes of the processing / sharing: What are the benefits of the processing/ sharing – for you, and more broadly?

Enrolment data shared to ensure enrolments are recorded properly; and funding generated

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.

Student satisfaction data collected

Describe compliance and proportionality measures, in particular:
What is your lawful basis for processing?

Public Interest

How will you ensure data quality and data minimisation?

Normal college process

What information will you give individuals?

Copy of enrolment form

Please attach a Risk Assessment if there are significant risks to data protection

Signed by Data Protection Officer



Name: S A Rankine

Date: 17/02/2021

Appendix 3: COMMUNICATIONS PLAN

TITLE OF COLLEGE POLICY:	DATE APPROVED BY
Sub-contracting Guide	Date:

AUDIENCE (select appropriate with √)			
Managers	X	Curriculum teams	Business Support teams
All staff		Suppliers	Partners
Other - Students			

CHANNEL (select appropriate with √)			
Policy & Strategy Team (PST)	X	Quality Improvement Network (QIN)	Marketing team
Meeting		Meeting	NC Update Intranet Website
Individual team		Suppliers	Partners
Document Library Noticeboards Team meeting Email		e.g. Letter or email Meeting	e.g. Letter or email Meeting
College Management Team (CMT)		JCNC	CORPORATION
Meeting		e.g. Meeting Email	e.g. Meeting Email

COMMUNICATIONS PLAN ACTIVATED BY:		
Name: SA Rankine Department	Job title: Deputy Principal Finance & Corporate Affairs	Date: 17/2 2021

