Purpose:

The Approval Pathways and Quality Assurance Guidelines for Domestic and International Subcontracting of Teaching Activity ensure that Massey University manages the risk associated with teaching subcontracting, undertaking such activities in a manner consistent with the maintenance of academic standards and the safeguarding of student interests.

Definitions:

**Subcontracting**: refers to situations where another provider offers all or part of a Massey University qualification through a contractual arrangement such as a memorandum of understanding, articulation or twinning agreement, or franchise arrangement. A 'provider' can include any other education organization.

This definition of subcontracting specifically excludes: teaching activity contracted to individuals; learning that occurs within vocational placements such as workplace placements; research activities; and student and staff exchange agreements.

**Low Risk Subcontracting Arrangements** are those where *all* of the following apply:

- a) The subcontractor *is* an NZQA registered provider (http://www.nzqa.govt.nz/providers/index.do)
- b) The course *is not* funded as Adult and Community Education
- c) Less than 25% of the total qualification will be subcontracted
- d) The arrangement is less than $150,000 per annum in total value
- e) The arrangement *is not* with an international provider

**High Risk Subcontracting Arrangements** are those where *any* of the following apply:

- a) The subcontractor *is not* an NZQA registered provider (http://www.nzqa.govt.nz/providers/index.do)
- b) The course *is* funded as Adult and Community Education
- c) Greater than or equal to 25% of the total qualification will be subcontracted
- d) The arrangement is greater than or equal to $150,000 per annum in total value
- e) The arrangement *is* with an international provider

Introduction:

Subcontracting arrangements most likely to be of benefit to students, staff and education providers are those where academic, resourcing, administrative and management considerations are examined during the initial planning stages and accounted for in the final arrangement. Relevant international practices have identified ten areas that are critical
to the successful development, delivery and ongoing monitoring and improvement of courses delivered by partner providers on and offshore:

1. Partner Selection
2. Development of Business Plans
3. Management & Coordination
4. Resourcing
5. Promotion & Marketing
6. Staff Quality, Support & Development
7. Admissions Standards & Procedures
8. Assessment & Student Learning
9. Student Support, Records & Administration
10. Course Monitoring & Improvement

For each of these areas, a set of guidelines is presented to assist academic, management and administrative staff in the fulfilment of their responsibilities for the development, review and endorsement of subcontracting arrangements. The guidelines are comprehensive and may not need to be applied in totality to every arrangement. However, staff are encouraged to consider the relevance and applicability of each guideline in every case.

DEVELOPMENT OF SUBCONTRACTING ARRANGEMENTS

Subcontracting arrangements are generally initiated from one of three sources:

a. academic staff initiatives based upon personal and professional interests, interactions and research with international colleagues; or
b. internationalisation initiatives involving multiple departments or Colleges that contribute to the enhancement of programmes and economic development of the University; or
c. opportunities based upon a desire to establish relationships to meet a specific need or opportunity for which collaborators are sought, this includes courses offered by the Centre for Professional and Continuing Education (PaCE).

APPROVAL PATHWAY AND RESPONSIBILITIES FOR LOW RISK SUBCONTRACTING ARRANGEMENTS

Figures 1 and 2 below show the formal approval pathway for all subcontracting arrangements classified as low-risk according to the definitions presented previously:
The responsibilities for each person or group are summarised in Table 1.

<table>
<thead>
<tr>
<th>Person or Group</th>
<th>Responsibilities</th>
<th>Relevant Guidelines</th>
</tr>
</thead>
</table>
| **Initiator**   | • Identifies the need for subcontracting teaching.  
                  • Liaises with appropriate departmental and support staff regarding the establishment of a subcontracting arrangement and the development of a business plan.  
                  • Contacts the Risk Management Section for the appropriate contractual template.  
                  • Forwards copy of the contract and business plan to the relevant Head of Department/s, Institute/s or School/s (or Director PaCE) for review and endorsement. | Guideline 1: Partner Selection  
Guideline 2: Development of Business Plans  
Guideline 3: Management & Coordination  
Guideline 4: Resourcing  
Guideline 5: Promotion & Marketing  
Guideline 6: Staff Quality, Support & Development  
Guideline 7: Admissions Standards and Procedures  
Guideline 8: Assessment & Student Learning  
Guideline 9: Student Support, Records & Administration  
Guideline 10: Course Monitoring & Improvement |
| **Head of Department, Institute or School / Director PACE** | • Reviews the sub-contracting arrangement to ensure consistency with the department’s strategic direction and resource capacity.  
                  • Ensures that any existing or proposed departmental structures and supports for the arrangement are accounted for in the business plan.  
                  • Takes the agreement to the College Executive (or Assistant Vice-Chancellor Academic & International (AVCAI) for PaCE courses) for review and endorsement.  
                  • Forwards the agreement to the relevant College Board for endorsement of the academic quality assurance arrangements. | Guidelines 1-6 |
| **College Executive (or delegate)** | • Advises the Pro Vice-Chancellor on the adequacy of the managerial, resourcing and relevant administrative considerations—this function may be delegated to another person or group as appropriate.  
                  • In the case of PaCE courses, the responsibilities of the College Executive are assumed by the AVCAI | Guidelines 3, 7-10 |
| **AVCAI for PaCE courses** | • Reviews the sub-contracting arrangements to ensure consistency with the academic aspirations of the College.  
                  • Advises the Pro Vice-Chancellor (or AVCAI for PaCE courses) on the adequacy of the relevant academic considerations—this function may be delegated to another person or group as appropriate. | Guidelines 1-10 |
| **College Board (or delegate)** | • Responsible for the final approval, or otherwise, of the subcontracting arrangement.  
                  • Forwards the final agreement to the Risk Management Section for input to the University’s subcontracting register and safe-keeping of the final original agreement.  
                  • Assumes overall accountability for the management of the quality of the course(s) delivered via the sub-contracting arrangement. | Guidelines 1-10 |
Table 1: Responsibilities for each of the persons or groups in the development and approval of low-risk subcontracting arrangements.

NOTE 1: In all cases where the subcontracting arrangement forms part of the introduction of a new subject or a new academic qualification, OR represents a substantial structural change to an existing programme including name or title changes, or changes to entry requirements, admission regulations, or credit transfer arrangements, the proposal must be forwarded from the College Board to Academic Committee and CUAP.

APPROVAL PATHWAY AND RESPONSIBILITIES FOR HIGH RISK SUBCONTRACTING ARRANGEMENTS:

The diagram below shows the formal approval pathway for all subcontracting arrangements classified as high-risk according to the definitions presented previously:

The responsibilities for each person or group are summarised in Table 2.
Initiator

- Identifies the need for subcontracting teaching.
- Liaises with appropriate departmental and support staff (local and external) regarding the establishment of a subcontracting arrangement and the development of a business plan.
- Contacts the Risk Management Section for the appropriate contractual template. In the case of international arrangements, the initiator will also need to contact the International Office for assistance with fulfilling the appropriate domestic and international requirements.
- Forwards copy of the contract and business plan to the relevant Head of Department/s, Institute/s or School/s or Director PaCE for review and endorsement.

International Office

- In the case of international arrangements, advises on arrangements with partners offshore.

Head of Department, Institute or School / Director PaCE

- Reviews the sub-contracting arrangement to ensure consistency with the department’s strategic direction and resource capability.
- Ensures that any existing or proposed departmental structures and supports for the arrangement are accounted for in the business plan.
- Takes the agreement to the College Executive (or AVCAI for PaCE courses) for review and endorsement
- Forwards the agreement to the relevant College Board for endorsement of the academic quality assurance arrangements.

College Executive

- Advises the Pro Vice-Chancellor on the adequacy of the managerial, resourcing and relevant administrative considerations.
- In the case of PaCE courses, the responsibilities of the College Executive are assumed by the AVCAI.

AVCAI for PaCE courses

- Advises the Pro Vice-Chancellor (or AVCAI for PaCE courses) on the adequacy of the relevant academic considerations.
- Forwards the arrangement to Academic Committee for review and approval of the academic quality assurance arrangements.

College Board

- Reviews the subcontracting arrangement to ensure consistency with the academic aspirations of the College.
- Approves, or otherwise, the academic quality assurance arrangements and provides any feedback or suggestions for changes to the relevant Pro Vice-Chancellor / AVCAI.

Academic Committee

- Reviews the subcontracting arrangement to ensure that the relevant academic quality assurance considerations have been made and are appropriately reflected in the arrangement.
- Approves, or otherwise, the academic quality assurance arrangements and provides any feedback or suggestions for changes to the relevant Pro Vice-Chancellor / AVCAI.

Academic Board

- Receives information regarding subcontracting arrangements via the Minutes of Academic Committee

Pro Vice-Chancellor / AVCAI (for PaCE courses)

- Reviews the subcontracting arrangement to ensure all academic, managerial, administrative and resourcing considerations have been made.
- Reviews feedback from Academic Committee and ensures that appropriate changes are made.
- Forwards the final agreement to the Vice-Chancellor for final approval. If the agreement is with an international provider, a copy must also be forwarded to the Assistant Vice-Chancellor (Academic & International) for review.
- Assumes overall accountability for the management of the quality of the course(s) delivered via the sub-contracting arrangement and facilitates links between the College, Regional and National Shared Services as required for effective implementation of the agreement.

Assistant Vice-Chancellor (Academic & International)

- In cases where the agreement is with an international provider, the Assistant Vice-Chancellor (Academic & International) advises the Vice-Chancellor on the adequacy of arrangements associated with the...
NOTE 1: In all cases where the subcontracting arrangement forms part of the introduction of a new subject or a new academic qualification OR represents a substantial structural change to an existing programme including name or title changes, or changes to entry requirements, admission regulations, or credit transfer arrangements, the proposal must be forwarded from the College Board to Academic Committee and CUAP.

QUALITY ASSURANCE GUIDELINES FOR SUBCONTRACTING ARRANGEMENTS:

GUIDELINE 1: PARTNER SELECTION

Items for Consideration

1.1 Commercial viability of the partner institution and reputation as a quality education provider

1.2 Relevant experience of the partner institution in the delivery of related qualifications at similar levels

1.3 Ability to register MU courses with appropriate authorities in the host country/ies.

1.4 Agreements do not compromise existing or anticipated agreements with other providers in the host country/ies with due consideration given to existing or anticipated agreements in other departments and Colleges at MU.

1.5 All financial, legal, educational and other arrangements with the partner institution are signed off in a contract approved by the appropriate MU delegate as specified in the Delegations of Authority Document.

1.6 A clear, agreed schedule, defining both partner’s responsibilities and accountabilities for course recruitment, support, staffing, resourcing, delivery, monitoring and improvement is present in the agreement.

1.7 The partner is able to provide professional and academic staff to support the delivery of MU courses.

1.8 The partner is able to provide appropriately located, suitable and safe student facilities and support services (premises, administrative support, library and computing facilities) at multiple locations if applicable.

1.9 The partner institution agrees to formalized procedures for course development and approval in line with the CUAP procedures for qualification approval and accreditation, and MU’s internal approval processes.

Where relevant, appropriate documentary evidence of the above processes might include:

- Contracts, Memoranda of Understanding, Articulation Agreements or Franchise Arrangements
- Feasibility studies
- Business plans
- Annual reports

GUIDELINE 2: DEVELOPMENT OF BUSINESS PLANS

Items for Consideration

2.1 Executive summary outlining the course offered, location/s, purpose, feasibility and those involved.

2.2 Rationale and broad objectives for the course that clearly demonstrate the expected outcomes and benefits to the College and University.

2.3 Market analysis including the market profile, client base and an assessment of competition (current and future).
2.4 Process and procedures for how the course will be promoted.

2.5 Identification of who will promote and market the courses and who will pay for this.

2.6 Measures for monitoring and evaluating marketing efforts are established.

2.7 Details of the respective roles and responsibilities of MU and the partner institution.

2.8 Detailed assessment of the risks, their potential impact and how they will be managed.

2.9 Identification of the resources required for the delivery of the course (human and non-human) and the impact (including financial) of the course on staffing, support services, infrastructure, equipment (including library and IT).

2.10 Assessment of the financial viability of the programme demonstrating it can generate a positive net income and specifying the minimum number of students required to sustain the programme financially.

2.11 Course fees and other income can be repatriated to MU and issues such as relevant taxation liabilities have been checked.

2.12 Fees for individual courses are set by Massey University in consultation with the partner institution and revised annually to include income splits between MU and the partner institution.

2.13 All financial arrangements and disbursements have been agreed to, documented and signed off by the appropriate MU delegate as specified in the Delegations of Authority Document and partner institution equivalent.

2.14 Quality assurance procedures to ensure the courses delivered by the partner institution are equivalent to courses delivered by MU leading to the same qualification.

2.15 An exit strategy has been identified and documented for each programme which identifies the performance requirements that, if not met, will trigger MU withdrawal from the arrangement.

Where relevant, appropriate documentary evidence of the above processes might include:

- Completed business plans
- Approvals—commercial
- Approvals—course approval and accreditation (including any course changes and approvals for these)
- Marketing plans
- Promotional and marketing materials
- Cost / benefit analyses

A Business Plan Template (including a risk assessment guideline) is available on the Massey Website:

**GUIDELINE 3: MANAGEMENT AND COORDINATION**

**Items for Consideration**

<table>
<thead>
<tr>
<th>3.1</th>
<th>Overall accountability for the management of the quality of the course(s) delivered by the partner institution to rest with the Pro Vice-Chancellor of the relevant College.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.2</td>
<td>Responsibilities, roles and accountabilities of relevant staff members are communicated in writing to all members of the partner institution teams and other interested parties.</td>
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<tr>
<td>3.3</td>
<td>Clear lines of accountability and supervision are established within each arrangement for MU and partner institution staff at academic, administrative and operational levels.</td>
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<td>3.4</td>
<td>Regular channels of communication are established and agreed between the partner institution administrative, coordination and academic staff.</td>
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<td>3.5</td>
<td>Individual courses, subjects and qualifications are approved by MU and/or CUAP in accordance with procedures for course approval and accreditation.</td>
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</tbody>
</table>
3.6 Individual courses comply with the University’s Teaching & Learning Policies including the Equivalence Policy.

3.7 Where necessary, the MU course has been recognized by the relevant in-country professional associations and/or statutory authorities.

Where relevant, appropriate documentary evidence of the above processes might include:
- Person and accountability statements for all staff involved in the subcontracting arrangement
- Diagrammatic representation of roles, lines of responsibility and accountabilities for MU and the partner institution
- Business plans
- Course approval documentation

GUIDELINE 4: RESOURCING

Items for Consideration

4.1 Identification of appropriately qualified and experienced teaching staff available and committed to deliver the courses according to agreed selection criteria both at MU and within the partner institution.

4.2 Administrative staff appointed by the partner institution to assist in the delivery of MU courses are approved by MU and have been inducted.

4.3 MU has available appropriate administrative staff with adequate time and resources to service the administration needs of the sub-contracted course, and are fully briefed on the processes/procedures and channels of communication.

4.4 All non-human resources, services and facilities at the partner institution meet appropriate standards as approved by MU and the partner institution.

4.5 The partner institution is able to provide safe, clean, ventilated premises suitable to the conduct of a MU undergraduate or postgraduate qualification.

4.6 Consultations have been held and agreement reached with the University Librarian and Director of Information Technology Services regarding requirements and costings for provision of services to students and staff at the partner institution.

4.7 Where a qualification includes a MU campus-based study component, this component is fully documented including the resources required for delivery.

4.8 A timetable and programme of visits to the partner institution by MU teaching and coordinating staff is agreed prior to each semester, resourced appropriately and factored into staff workload allocations.

Where relevant, appropriate documentary evidence of the above processes might include:
- Person and accountability statements for all staff involved in the subcontracting arrangement
- Reports on partner institution resources and facilities
- Library and IT resource statements
- Programme of visits to the partner institution

GUIDELINE 5: PROMOTION & MARKETING

Items for Consideration

5.1 The nature of the award, who grants it and the MU regulations pertaining to this are agreed to by the partner institution and are made clear in all marketing and promotional documents.

5.2 Rules for advertising the programme (such as the partner institution: only being able to advertise the course with the written permission of MU; identifying MU as the registered provider in all materials; not promoting the course until it has been approved and accredited as required) are articulated including regulation of the use of each other’s name or logo.
5.3 Information to be delivered to all intending students prior to enrolment to include: a written description of course, the content and the delivery mode(s); qualification to be conferred on completion; qualification duration; teaching and assessment methods; details of any arrangements for credit transfer and recognition of prior learning; information about entry requirements; and a general description of facilities, equipment and learning resources available to students.

5.4 All promotional materials to include an itemized list of fees payable and the fee refunds policy.

5.5 A marketing and recruitment plan is developed and agreed with the partner institution.

5.6 Measures for monitoring and evaluating marketing efforts are established and agreed with the partner institution.

5.7 Arrangements are made for the sharing of tangible documentary evidence (e.g. certificates, photographs of joint ceremonies etc) of the association between MU and the partner institution for public display in offices, exhibitions etc.

<table>
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<tr>
<th>GUIDELINE 6: STAFF QUALITY, SUPPORT &amp; DEVELOPMENT</th>
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<tbody>
<tr>
<td><strong>Items for Consideration</strong></td>
</tr>
<tr>
<td>6.1 Procedures and criteria for ensuring appropriate staff appointment, performance review and support are in place and comply with MU requirements.</td>
</tr>
<tr>
<td>6.2 All staff (MU or partner institution) have appropriate qualifications and demonstrated experience in teaching the subject(s) to which they are allocated.</td>
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<tr>
<td>6.3 All staff have a clear understanding of their responsibilities in supporting students and are available for student consultation by phone, fax or email as required.</td>
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<tr>
<td>6.4 MU staff are fully briefed on the relevant educational, social, economic, cultural and historical context of the partner institution prior to commencement of teaching and are aware of resources and support available to them at MU.</td>
</tr>
<tr>
<td>6.5 Staff in the partner institution are fully briefed on all relevant aspects of MU’s institutional culture and the MU teaching and assessment standards prior to commencement of teaching.</td>
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<tr>
<td>6.6 If the course is to be taught offshore, appropriate work visas and permits are organized for MU staff before programmes commence.</td>
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Where relevant, appropriate documentary evidence of the above processes might include:
- Recruitment procedures and job/person specifications (consistent with MU procedures and standards for staff recruitment)
- List of all staff currently involved in sub-contracted course delivery with roles, responsibilities and lines of accountability
- Outlines of staff induction programmes at MU and the partner institution
- Process for formal and informal interactions between MU and partner institution staff

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<tr>
<th>GUIDELINE 7: ADMISSIONS STANDARDS AND PROCEDURES</th>
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<tbody>
<tr>
<td><strong>Items for Consideration</strong></td>
</tr>
<tr>
<td>7.1 Criteria or tests used for admission to partner institutions are equivalent to those used by MU.</td>
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<tr>
<td>7.2 Students admitted to subcontracted courses have appropriate language proficiency as specified in the MU Calendar or</td>
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7.3 Assessment of all applicants’ qualifications is undertaken when these are a requirement for admission.

7.4 MU and the partner institution agree to a minimum and maximum number of commencing students for a cohort to be financially viable.

7.5 Procedures and timelines for the transfer and processing of enrolment applications are agreed by MU and the partner institution. The following items will need to be addressed:
- Printing, transfer and the nature of the application forms
- Clear delegations for the completion of application forms by MU staff and partner institution staff where appropriate to include the collection and certification of evidence of academic qualifications, work experience and English proficiency
- Delegations for course approval
- Procedures for application, review and approval of RPL and credit transfer requests
- Procedures for the preparation and posting to students of information relating to their enrolment status; and notification to MU or the partner institution (as appropriate) of this information
- Procedures for changes to the student’s enrolment including withdrawal procedures and procedures for re-enrolment
- Details of the collection of fees including receipt and handling of fee payments and the communication of an agreed fee refunds policy
- Graduation procedures

Where relevant, appropriate documentary evidence of the above processes might include:
- Processes and timelines for managing admissions, enrolment etc
- Admission criteria
- Guidelines and procedures for RPL and credit transfer
- Enrolment and re-enrolment materials sent to students
- Student information and publications

GUIDELINE 8: ASSESSMENT AND STUDENT LEARNING

Items for Consideration

8.1 Paper outlines and study guides include details of learning objectives, course content, course duration, contact details for staff at the partner institution and MU, credit transfer arrangements, facilities, expected equipment levels, support and learning resources, methods of study, fees, refund procedures, relevant attendance and assessment requirements, advice to students on good academic practice and other such information regarding conduct and the University’s student grievance procedures.

8.2 Teaching and learning materials are appropriate to the specific course and equivalent to those provided in the same MU qualification delivered at its campuses or extramurally, taking into consideration the particular needs of the contexts of students in the partner institution.

8.3 There is an explicit assessment and moderation policy, and procedures for ensuring the equivalence of course offerings.

8.4 Assessment task types, weightings and support materials are appropriate to each course.

8.5 Where appropriate, appointment and approval of external examiners or moderators is undertaken by MU.

8.6 Approval of student results is given by MU.

8.7 Appropriate security arrangements are made with the partner institution for ensuring correct supervision of examinations and assuring the security of papers, assignments and results.

8.8 English language academic literacy support is provided to students as appropriate.

Where relevant, appropriate documentary evidence of the above processes might include:
GUIDELINE 9: STUDENT SUPPORT, RECORDS AND ADMINISTRATION

Items for Consideration

9.1 Relevant course orientation and advice is planned and delivered to students enrolled for sub-contracted courses. This should cover the goals and objectives of the course, attendance and assessment requirements, delivery approaches, roles and obligations of MU and the partner institution, an overview of resources and access procedures, grievance procedures, student obligations, assessment requirements, RPL and fee refund processes, identification of course contacts and clarification of how and when course staff can be accessed.

9.2 Relevant MU regulations, policies and procedures are made available to students in hard copy or online.

9.3 Student satisfaction with the sub-contracted courses is tracked using appropriate methods and measures.

9.4 Students are notified of the nature and levels of access they can expect of staff, supervisors and support systems.

9.5 Responsibility for the provision of Student ID cards is identified and mechanisms are established to allow prompt, up to date and accurate information to be uploaded to SMS.

9.6 Procedures for records management and the release of student results are established and agreed between MU and the partner institution.

9.7 Adequate remote access to MU library services and resources is provided including databases.

9.8 Students are advised of the administrative arrangements for transferring from a programme in the partner institution to the same programme delivered at MU.

Where relevant, appropriate documentary evidence of the above processes might include:
- Student handbook or equivalent
- Student records
- Guidelines and procedures for RPL and credit transfer
- Enrolment and re-enrolment materials
- Course orientation outlines and copies of all materials distributed to students
- Results of student satisfaction surveys

GUIDELINE 10: COURSE MONITORING AND IMPROVEMENT

10.1 Partner institution has an agreed implementation tracking and improvement plan which meets MU requirements and shows the following indicators: demand, retention, pass and graduation rates for each year; student satisfaction data; and student progress reports for research degrees.

10.2 Responsibility for generating data on the indicators above, and developing improvement strategies is allocated.

10.3 Appropriate approvals and accreditation for delivering a new or revised course is gained from the appropriate bodies.

10.4 Procedures for course / qualification review are present and compliant with MU procedures.

Where relevant, appropriate documentary evidence of the above processes might include:
- Results of student satisfaction surveys
- Collection and submission of performance data by MU and the partner institution on course demand, pass and completion rates
- Course income
• Review reports

**Audience:**

All University Staff

**Relevant Legislation:**

None.

**Legal Compliance**

Nil

**Related Procedures/Documents:**

- Business Plan Template
- Creation of Contract Policy
- CUAP Functions and Procedures
- Delegations of Authority Document
- Subcontracting of Teaching Activity Policy
- Subcontracting Template – Long Form for High Risk Contracts
- Subcontracting Template – Short Form for Low Risk Contracts
- Teaching and Learning Policy
- TEC Funding Rules for Subcontracting on-Plan delivery (Condition SAC356)
- TEC Funding Rules for Subcontracting off-Plan delivery (Condition SAC357)

**Document Management Control:**

Prepared by: Academic Strategy Manager
Authorised by: Vice-Chancellor
Approved by: AB11/110-October: 3.2.2.1
Date issued: 16 March 2005
Last review: August 2011
Next review: August 2014