GO4GROWTH

Guide to Associated Persons, Connected Persons and Subcontractors

Why does this matter?

When completing the Central Digital Platform Questions and **Procurement Specific Questionnaire (PSQ)** you may be asked about:

- Connected Persons
- Associated Persons
- Subcontractors

These are **not the same thing**.

Providing incorrect information can delay your bid or, in some cases, result in exclusion.

Step 1 - Is it a Connected Person?

Connected persons are persons/organisations who exercise (or have a right to exercise) significant influence or control over the supplier and those over which the supplier exercises (or has the right to exercise) significant influence or control.

Examples include:

- Company directors
- Parent companies
- People with Significant Control (PSC)

Check before you submit

Where applicable, the information you provide should be consistent with:

- Companies House
- The Central Digital Platform (CDP)
- Your own company records

Top tip: If your Central Digital Platform responses and/or PSQ (Procurement Specific Questionnaire) don't match Companies House, this can cause problems for your application

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Step 2 - Is it an Associated Person?

An Associated Person is someone **you are relying on** to help you meet the procurement requirements (called conditions of participation).

For example:

- A consortium member
- A specialist subcontractor whose technical capability, experience or qualifications you're relying on
- Parent companies who you are relying on for certification or policies that are listed as a condition of participation.

- Another organisation providing financial or technical capability needed to pass selection (this does not include a guarantor)

Think of it like this: **Could we still satisfy the Conditions of Participation without them?**
If the answer is **No**, then they're likely to be an Associated Person.

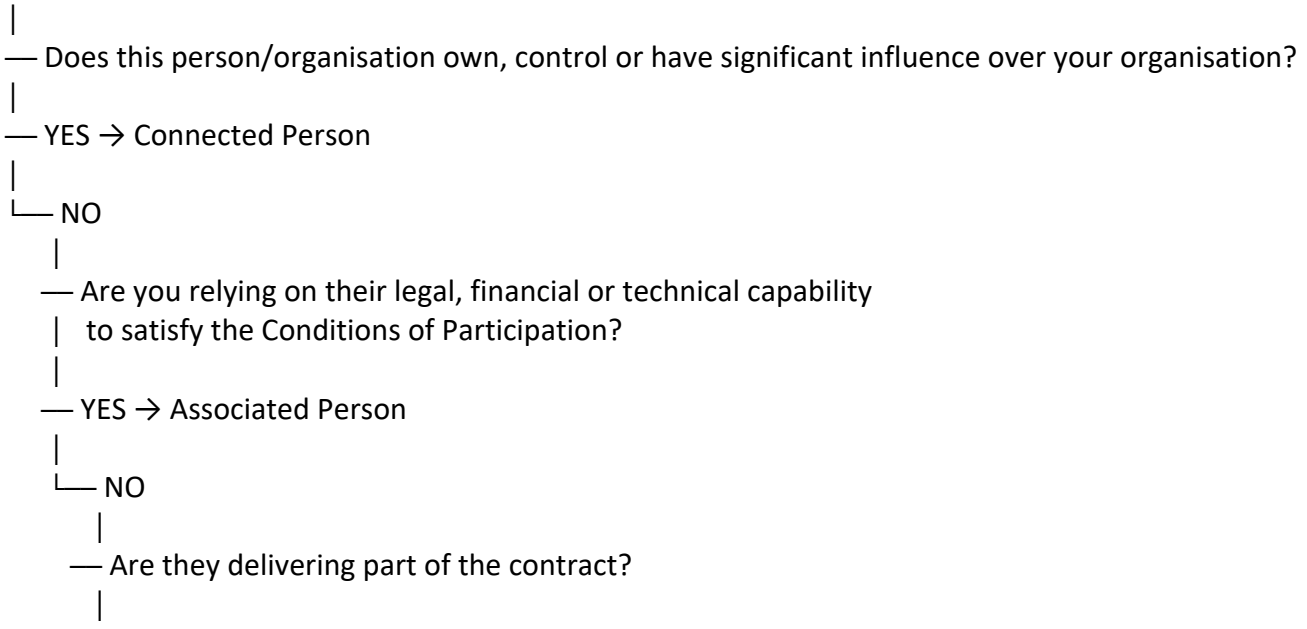
Step 3 - Is it a subcontractor?
Not every subcontractor is an Associated Person.

Examples: (assuming these services are not the main subject of the contract):

Subcontractor	**Associated Person?**
Cleaning contractor	❌ No
Office stationery supplier	❌ No
Courier	❌ No
Specialist engineer whose technical experience, capability or qualifications you're relying on	✓ Yes
Consortium member	✓ Yes

Important: Where contracting authorities are running a competitive tender process, in line with the regulations, the PSQ will normally ask you whether you intend to subcontract all or part of the contract. Follow the instructions for that procurement.

Decision Tree
START



— YES → They are likely to be a subcontractor.
  | the official guidance states that the supplier must provide an exhaustive list of all the intended sub-contractors in the supply chain that are known at the relevant point in the procurement.
  |
  └— NO → you do not need to include every supplier with whom you have a commercial relationship (for example where there is no intention to specifically sub-contract all or part of the contract to that supplier)

If someone (including sub-contractors) is an Associated Person...
You may be asked to:

- declare them in your tender
- provide information through the Central Digital Platform (where required)
- provide any information requested about applicable exclusion grounds, including whether they are on the Debarment List where required.

The exact information requested will be determined by the procurement specific questionnaire (PSQ).

If an exclusion ground applies to an Associated Person, the contracting authority **may allow you to replace them**, depending on the circumstances.

Before you press Submit check the following:
☐ My Connected Persons match Companies House and the CDP.
☐ I have identified anyone I'm relying on to satisfy the Conditions of Participation.
☐ I've checked whether the tender asks for all subcontractors to be declared.
☐ Any Associated Persons have completed the required supplier information (where requested).
☐ My answers are consistent throughout my submission.

Scenarios

Scenario	**What do I declare?**
My accountant prepares our annual accounts.	Nothing.
I'm using a freelance bid writer (who is not helping us to satisfy the conditions of participation), bidding alone with no sub-contractors.	Nothing.
We're relying on another company to provide the specialist cyber security expertise required to pass the technical selection stage.	**Associated Person.**
We're bidding as a consortium.	**Consortium members are Associated Persons.**
My company director	**Connected Person.**
We use a courier to make deliveries during the contract (this is not the core contract subject matter).	**Usually a subcontractor only**

IMPORTANT NOTE:

- **If in doubt, check the procurement documents or ask the contracting authority through clarification questions.**
- **Different procurements can have different disclosure requirements so it's important to read the details of what's required for that particular opportunity.**
- **If you rely on an Associated Person, make sure they know they may need to complete information on the Central Digital Platform before you submit your tender.**