

Waltham Forest Adult Learning Service: Subcontracting and Supply Chain Policy

Waltham Forest Adult Learning Service

Version 1.0 (GLA-aligned)

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Waltham Forest Adult Learning Service: Subcontracting and Supply Chain Policy

1. Purpose of the Policy

This policy sets out the Waltham Forest Council's approach to subcontracting Adult Learning provision. It ensures that any subcontracted delivery is transparent, proportionate, high-quality, and fully compliant with the requirements of the Department for Education (DfE), the Greater London Authority (GLA), and the Council's own governance and financial procedures.

The policy applies to all current and future subcontracting arrangements entered into by the Council's Adult Learning Service.

2. Scope

This policy applies to all subcontracted Adult Learning provision delivered using:

- Adult Skills Fund (ASF)
- Tailored Learning (TL)
- Any successor or replacement adult skills funding
- Other national, regional, or externally funded adult learning programmes administered by the Council.

The policy covers all forms of subcontracting, including time-limited arrangements, call-off contracts, frameworks, and Approved Provider Lists.

3. Principles

The Council is committed to ensuring that subcontracting:

- delivers clear benefits to learners and communities
- represents value for public money
- protects learners, staff, and public funds
- is managed transparently and proportionately; and
- meets all funding, legal, and quality requirements.

The Council operates a combination of direct delivery and commissioned provision. The balance between these approaches may vary over time in response to strategic priorities, learner need, funding conditions, local labour market requirements and value for money considerations. Subcontracting is used strategically where it delivers demonstrable value,

extends reach, or enables access to specialist capacity that cannot be delivered as effectively through direct delivery alone. The balance between directly delivered and subcontracted provision may vary over time in response to strategic priorities, learner need, funding conditions, and local labour-market requirements.

4. Rationale for Subcontracting

Subcontracting may be used where it enables the Council to:

- extend provision to priority or under-represented learner groups
- reach communities that are less likely to engage with mainstream provision
- deliver specialist, niche, or community-based learning
- respond flexibly to emerging local skills or labour-market needs; or
- pilot or test new areas of provision before longer-term commissioning decisions are made.

Subcontracting forms an integral part of the Council's overall delivery model and is used alongside direct delivery to ensure that Adult Learning provision remains responsive, inclusive, high quality, and sustainable.

5. Procurement and Selection of Subcontractors

All subcontractors are selected through fair, transparent, and compliant procurement processes, in line with:

- the Council's Contract Procedure Rules
- public procurement legislation; and
- relevant funding body requirements.

Procurement approaches may include openly advertised competitions, frameworks, or Approved Provider Lists, as appropriate to the scale, risk, and nature of the provision.

No subcontracting arrangement will be entered into without:

- appropriate delegated authority or formal approval; and
- completion of all required governance and assurance steps.

6. Due Diligence and Contracting

Before any subcontracting arrangement is approved, the Council will undertake robust due diligence, which includes, but not limited to:

- financial health and viability checks
- track record and quality performance
- safeguarding and Prevent arrangements
- data protection and information governance
- capacity to deliver agreed volumes and outcomes; and
- alignment with funding rules and learner eligibility requirements.

Safeguarding arrangements form a core part of the Council's due diligence and ongoing contract management processes.

Due diligence may include review of previous performance, Ofsted outcomes, awarding organisation performance, financial health, staff qualifications and experience, safeguarding arrangements, quality assurance systems, funding compliance history and organisational capacity.

The Council does not permit second-level subcontracting.

All subcontracted provision operates under a formal written contract, setting out clear expectations, responsibilities, and controls.

7. Management Fees

Where subcontracting arrangements include a management fee, the Council will retain up to 20% of the funding allocated to subcontracted provision.

The management fee is deducted from funding received by the Council prior to allocation to subcontractors and represents the costs incurred by the Council in identifying, contracting, managing, assuring and supporting subcontracted provision.

Management fees are applied to ensure that subcontracted delivery is:

- effectively governed and monitored
- compliant with funding, statutory and contractual requirements
- supported to maintain and improve quality and safeguarding practice; and
- managed in a way that protects learners and public funds.

The Council will ensure that:

- management fees are transparent and proportionate
- fee levels are communicated clearly to subcontractors
- retained funding is used directly to support learner protection, quality assurance and compliance; and
- management fee arrangements are reviewed regularly to ensure continued value for money.

8. Support Provided to Subcontractors

In return for the management fee, subcontractors receive structured support, which includes, but not limited to:

- performance, KPI and data monitoring
- quality improvement and assurance activity and observation
- funding and compliance guidance
- safeguarding and learner-protection support
- access to policy updates, training and briefings; and
- support with improvement planning where required.

The level of support provided is ‘risk-based’ and responsive to the needs and experience of individual subcontractors.

9. Quality Assurance and Performance Management

The Council operates a risk-based approach to monitoring subcontracted Adult Learning provision to ensure high-quality delivery, learner safety, and compliance with funding and statutory requirements. Monitoring activity includes, but is not limited to:

- regular performance reviews
- audit and compliance checks
- observation of teaching, learning, and assessment
- audit, moderation and standardisation across the provision
- promotion of sharing and developing good practice
- safeguarding oversight and assurance
- learner feedback and survey analysis; and
- review of Self-Assessment Reports and Quality Improvement Plans.

Safeguarding and learner welfare are of primary importance. As part of its quality assurance arrangements, the Council will routinely:

- assess and monitor subcontractors' safeguarding policies, procedures and practice in relation to adult learners
- test the effectiveness of safeguarding arrangements through audit, review and discussion
- ensure that subcontractors meet statutory safeguarding and Prevent requirements, including appropriate staff training and reporting arrangements; and
- support the development and continuous improvement of safeguarding practice where required.

Subcontractors must notify the Council immediately of any sanction, investigation, regulatory action or adverse finding issued by an awarding organisation, Ofsted, funding body or regulatory authority.

Where performance, quality, safeguarding, or compliance concerns are identified, the Council will intervene proportionately. This may include enhanced monitoring, targeted support, corrective action plans, suspension of delivery, or termination of subcontracting arrangements in accordance with contractual terms.

10. Payment Terms

Payment arrangements are set out clearly within individual contracts. Payments are:

- subject to satisfactory performance
- conditional on compliance with funding rules; and
- dependent on receipt of funds from the relevant funding body.

Over-delivery beyond agreed contract values is undertaken at subcontractor risk unless formally approved.

11. Risk Management, Intervention and Termination

The Council reserves the right to take prompt action where there are concerns relating to:

- safeguarding or learner welfare
- quality of provision
- financial irregularity or mismanagement
- non-compliance with funding rules; or
- material breach of contract.

This may include suspension or termination of subcontracting arrangements in accordance with contractual terms.

12. Transparency and Publication

This policy is published on the Council's Adult Learning website and made available to:

- existing subcontractors
- prospective subcontractors; and
- stakeholders and funding bodies.

Information relating to subcontracted provision and management fees will be published annually where required by funding rules.

13. External Assurance

Where required by funding rules, the Council will obtain independent external assurance of its subcontracting arrangements and publish any required declarations, certificates, reports or improvement plans.

14. Review of the Policy

This policy will be reviewed annually, or sooner where funding rules, legislation, or subcontracting arrangements change.

Approved by: Tara Roudiani, Adult Learning Lead

Date approved: 17 April 2026

Next review date: April 2027

Appendix A

Current Subcontracting Arrangements (MANDATORY)

(See also WFALS Subcontracting and Allocation Payments document)

This document must be updated every year and published to the WFALS website.

Subcontractor	UKPRN	Contract Start date	Contract End date	Provision Type	Funding paid by GLA for delivery of provision	Funding paid to subcontractor	Funding retained by WFALS
		01/08/2026	31/07/2027				

Appendix B

Waltham Forest's Adult Learning Supply Chain Management Fee Transparency

Academic Year: 2026-27

Waltham Forest Council's Adult Learning Service works with subcontracted delivery partners to support the delivery of high-quality Adult Learning provision. Where provision is subcontracted, the Council retains a management fee of up to 20% of the funding allocated to the subcontracted activity.

The management fee is not a profit-making charge. It represents the costs incurred by the Council in managing, assuring and supporting subcontracted provision and ensuring that public funding is used appropriately, transparently and in line with funding and statutory requirements.

What the management fee is used for

The management fee contributes to the costs of:

- procurement and contracting of subcontracted provision
- financial management and funding compliance
- performance monitoring and data validation
- quality assurance activities, including observations, audit and moderation
- safeguarding and Prevent oversight and assurance for adult learners
- contract management, review and intervention where required
- support and guidance provided to subcontractors to improve quality and outcomes
- reporting to funding bodies and meeting transparency requirements.

Proportionality and value for money

Management fees are applied on a transparent and proportionate basis and are reviewed regularly to ensure they represent value for money. The level of management and oversight applied to individual subcontractors is risk-based and reflects the nature, scale and complexity of the provision being delivered.

Publication and review

This statement is published annually alongside the Council's Subcontracting and Supply Chain Fees Policy. Actual supply chain arrangements and retained management fees are published where required by funding rules.

(This is the annual transparency statement and must be published annually alongside the policy.)

Appendix C

Support and Oversight Provided in Return for the Management Fee

In return for the management fee, and in line with the Council's Subcontracting and Supply Chain Policy, subcontractors will receive the following support and oversight. The nature, level and frequency of support provided is risk-based and proportionate, and reflects the scale, complexity and performance of each subcontractor.

1. Communication and coordination

- Regular engagement with subcontractors to share updates on funding rules, policy changes, quality expectations and curriculum priorities
- Opportunities for subcontractors to share good practice and learning across the provider network.

2. Performance and quality monitoring

- Monitoring of subcontractor performance against agreed outcomes, KPIs and success measures
- Scheduled performance reviews, including proportionate checks of systems, records, tutor reports and learner files
- Review of subcontractors' Self-Assessment Reports and Quality Improvement Plans, with feedback and support where required.

3. Teaching, learning and assessment quality

- Observation of teaching, learning and assessment activity where appropriate
- Joint or paired observations and quality discussions to support improvement
- Curriculum quality review to ensure provision meets learner need and local priorities
- Moderation and standardisation activity to support consistency in assessment, learner work and observation practice.

4. Learner feedback and voice

- Collection of learner feedback across subcontracted provision
- Participation in the London Learner Survey where required
- Analysis of learner feedback to identify strengths, risks and areas for improvement.

5. Staff development and capacity building

- Access to professional development opportunities and updates for subcontractor staff and tutors
- Targeted support to improve teaching, delivery and learner outcomes where needed.

6. Funding, compliance and assurance

- Guidance and support to help subcontractors meet funding rules, data requirements and relevant legislation
- Proportionate compliance checks to reduce financial, quality and delivery risk.

7. Safeguarding and learner protection

- Review and monitoring of safeguarding and Prevent policies, procedures and practice in relation to adult learners
- Testing of safeguarding arrangements through audit, discussion and review
- Support for the development and continuous improvement of safeguarding practice where appropriate.

8. Systems, data and infrastructure

- Support with management information systems and accurate data recording, reporting and submission
- Secure information sharing arrangements to support compliance and effective partnership working.