

**Report to:** Matt Rumble Director Economic Development and Regen– Place

**Date:** 09/07/2025

**Subject:** Procurement Strategy for Hammersmith and Fulham Adult learning & Skills (HFALS) subcontracting Strategy 2025.

**Report Author:** David Ede, Senior Manager contracts and Funding.

---

## **SUMMARY**

The scope of the project is to subcontract learners in the Adult Skills Fund (ASF) funding stream in the areas of English, Maths, Business, Employability, Green Skills, Science Technology Engineering, Medicine, Digital and Creative Media (STEM3) and Health and Wellbeing. L1/L2/ L3 and L4 qualifications linked to employability, such as Health & Social Care and Care, and Hospitality and retail will be in scope.

HFALS understands that by subcontracting elements of its funding to external providers it is enhancing the offer of provision available to its learners. The use of subcontractors enables the service to offer a more comprehensive service, working in more specialist and hard-to-reach areas, specifically in Green Skills and Science Technology, Engineering Maths, Medicine and Media (STEM3).

This will support the opening of the new Education City HFALS venue and also link to the Upstream London Strategy with Imperial in the White City Innovation District (WCID).

---

## **RECOMMENDATIONS**

1. The request is for HFALS to be approved to form effective collaborative working arrangements with up to 10 similar providers locally, including Third Sector organisations. Subcontracted delivery commences from 05/01/2026. The plan is to subcontract £584,000 of provision each year, for a three-year period across a pool of approved learning organisations, the total value of the contracts will be £1,752,000.

---

**Wards Affected:** All

---

<b>Our Values</b>	<b>Summary of how this report aligns to the H&amp;F Corporate Plan and the H&amp;F Values</b>
Building shared prosperity	H&F and its partner Imperial College, London, have the Upstream London Strategy. One of the

<b>Our Values</b>	<b>Summary of how this report aligns to the H&amp;F Corporate Plan and the H&amp;F Values</b>
	four priorities is “ <b>Economic Growth for All</b> ” – support residents into high quality training and employment with the skills they need for the 21 <sup>st</sup> century.
Creating a compassionate and inclusive council	This report presents the opportunity for HFALS to continue to collaborate with other providers to expand the learning opportunities available to residents. This will lead to HFALS delivering more qualification courses with more learners from the Adult Skills Fund (ASF) funding stream.
Doing things with local residents, not to them	The impact of the project will be significant on most stakeholders, but learners should not notice a major difference apart from HFALS operating from more venues. HFALS will have a higher profile locally cementing its work with The Economic Development team and other local learning organisations.
Being ruthlessly financially efficient	Overall, there will be rationalization of resources and a cost saving on delivery per learner. This will help to guarantee the future of HFALS in the eyes of the funding bodies (GLA/DFE).
Taking pride in H&F	This project will support the H&F priorities of:  “ <b>West Tech</b> ” H&F will be a global beacon for innovation and growth. “ <b>Encouraging Enterprise</b> ” – H&F to be the best borough in Europe for businesses to start up, survive and grow. “ <b>A great place to do business</b> ” – Improve town centres and commercial hubs to transform what they offer and to promote a vibrant arts, culture and leisure scene.
Rising to the challenge of the climate and ecological emergency	There were an estimated 241,000 jobs in green priority sectors in London in 2023, with this figure forecast to reach 505,000 by 2030. Green spaces also play a key role in supporting green growth across London’s economy – from parks through to

<b>Our Values</b>	<b>Summary of how this report aligns to the H&amp;F Corporate Plan and the H&amp;F Values</b>
	<p>the greening of buildings. More broadly, green roles will be needed in all businesses – from managing energy use through to marketing products and services. HFALS are keen to support delivery of ASF and Free Course For Jobs (FCFJ) courses that support progression into green occupations, particularly in retrofitting and green construction. HFALS are also interested in the delivery of skills that will support the transition to net-zero carbon across a range of industries where jobs are likely to change.</p>

## **Financial Impact**

The financial cost of the decision is up to £584,000 per year. The plan is to subcontract £584,000 of provision each year, for a three - year period across a pool of approved learning organisations. The total is £1,752,000 for the three-year period. HFALS is Grant funded from the Greater London Authority (GLA) and the Department For Education (DFE).

There is no plan for an annual uplift between year 1 and year 3.

The GLA also have their own due diligence process in place to confirm providers are acceptable following our selection.

HFALS will retain a management fee from all subcontracted organisations, and this ranges between 15% and 20%. The amount retained reflects the cost of the procurement process and the management of the contracts. For Academic year 2026/27 the percentage retained will be between 15-20%.

Completed by Will Stevens, Finance Manager Place, 20/7/25

## **Legal Implications**

Going to market in an open tender would be in compliance with the Procurement Act 2023 and the Council's Contract Standing Orders.

*Joginder Bola, Senior Solicitor (Contracts & Procurement), 11 July 2025*

## **Procurement Comments**

The procuring officer must continue to work with the Procurement and Commercial team to ensure the procurement process is undertaken compliantly and in accordance with the Procurement Act 2023.

The Procurement and Commercial team have requested Conflict of Interest Declaration Forms from colleagues involved in, and/or with influence over any decision making regarding the procurement process.

A Preliminary Market Engagement event took place on 16<sup>th</sup> July 2025 the event was attended by 22 people from 19 organisations. The feedback was very positive with most of the attendees saying they will be submitting a response once the Invitation to Tender is published.

The procurement project must be set up on and undertaken using the [capitalEsourcing](#) eProcurement portal, and all associated details and documents must be attached to the project.

*Jacqueline Rutherford Procurement Category Specialist 17<sup>th</sup> July 2025*

---

## DETAILED ANALYSIS

### Background

1. The goal is for HFALS to continue to form and develop effective collaborative working relationships with up to 10 similar learning providers locally, including Third Sector organisations. Subcontracted delivery to commence from 5/01/2026.
2. The plan is to subcontract £584,000 of provision each year, for a three-year period across a pool of approved learning organisations.
3. The project will take up to 6 months to complete and therefore needs to commence in July 2025. This allows sufficient time to gain GLA/DFE provider approval and complete an effective due diligence process selecting providers.

The scope of the project is to subcontract learners in the ASF funding stream in the areas of English, Maths, Business and Digital Skills, Employability, Green Skills, Creative Skills (STEM 3) and Health and Wellbeing. L3/L4 qualifications linked to employability, such as Health & Social Care and Care, and Hospitality and retail. Other programmes will include Entry Level, L1, L2, and L3 qualifications linked to employability, such as Construction, Health & Social Care and Care, and Hospitality and retail and Science Technology, Engineering Maths, Medicine and Media (STEM3). This will support the opening of the new HFALS Education City venue in January 2026 and also links to the Upstream London Strategy with Imperial in the White City Innovation District (WCID).

4. H&F and its partner Imperial University have launched the Upstream London . strategy. One of the four priorities is “**Economic Growth for All**” – support residents into high quality training and employment with the skills they need for the 21<sup>st</sup> century. Hence there is a local drive to increase employment outcomes

for residents with a particular focus on the White City Innovation district (WCID) and other areas in the borough.

### **Other priorities are:**

- **“West Tech”** H&F will be a global beacon for innovation and growth.
- **“Encouraging Enterprise”** – H&F to be the best borough in Europe for businesses to start up, survive and grow.
- **“A great place to do business”** – Improve town centres and commercial hubs to transform what they offer and to promote a vibrant arts, culture and leisure scene.

### 5. The GLA Priorities for Adult Education in London are:

Digital  
Construction/Retrofit  
Health and Social Care (HSC)  
Hospitality  
Green skills  
Creative industries  
Science Technology, Engineering Maths, Medicine and Media (STEM3).

### 6. The “London Growth Plan” indicates change is very much on the agenda with employers having a more central role for **Local Skills Improvement Plans (LSIP’s)**.

7. HFALS has successfully subcontracted adult learning delivery from the 2023/24 academic year, August to July and wishes to expand on this approach. HFALS quality systems for subcontracted delivery were externally audited by Forvis Mazars and a positive report was received. Overall, there will be rationalization of resources and a cost saving on delivery per learner. This will help to guarantee the future of HFALS in the eyes of the funding bodies.

8. Possible providers will be researched thoroughly to ensure their quality of provision is good to outstanding and that they are financially secure as the subcontracting organization will be measured by the outsourced provider’s achievement rates. The Capita E-Sourcing tendering process will be used to procure preferred providers with the support of the corporate Procurement team.

### **Reasons for Decision**

1. HFALS needs to further develop various business models if it is to continue to support residents in the quest for employment outcomes. This project supports the implementation of the Hammersmith & Fulham Industrial Strategy.

2. There is a growing need in H&F for people with skills in the subject areas listed above to support the Industrial strategy. This is a growing area for development with some existing learning organisations offering qualifications in the key areas. This will also support the potential for start - up concerns to develop into teaching & learning subjects such as Green Skills, STEM3 and Artificial Intelligence (AI).

## **Contract Specification Summary**

1. The project will contract approved HFALS subcontractors to deliver education and training in the following subject areas:

**ENGLISH AND MATHS:** Delivery of Functional Skills in English and maths and support learners towards GCSE qualifications and employment outcomes.

Employability Skills to support learners into employment.

Creative Skills to support learners into employment.

Hospitality & Retail to support learners into employment.

Health and Social Care, and Care to support learners into employment.

Digital Skills. Delivery of IT qualifications to support learners into employment.

Construction, Retrofit and Green Skills qualifications to support learners into employment.

Science Technology, Engineering Maths, Medicine and Media (STEM3).

Other areas which may be of benefit to H&F residents.

2. The contract length will be a one year plus one year plus one year contract. HFALS will have the option to end the agreement at the end of each year if learner achievement rates are less than 80% or the provider receives a Requires Improvement (Grade 3) rating from Ofsted.

## **Procurement Route Analysis of Options**

The procurement falls within scope of the Procurement Act 2023, Procurement Regulations 2024 and the Council's Contracts Standing Orders as applicable. The services being procured have been identified as falling within the scope of "Adult and Further Education Services" (CPV code 8040000)

The procurement route will be the open procedure a single-stage process where interested suppliers can submit a tender for one or more lots. To participate in the tendering competition suppliers will need to meet specific "Conditions of Participation"

**Option 1** - do nothing, but not an option due to lack of an internal skill set.

**Option 2** – Call off from a framework. This has been explored, and no suitable framework is available.

**Option 3** – Going to market in an open tender. To get best value and most appropriate suppliers meeting the specification. (Preferred option).

## **Market Analysis and Engagement**

1. A Preliminary Market Engagement event took place on 16<sup>th</sup> July 2025 the event was attended by 22 people from 19 organisations. The feedback was very positive with most of the attendees saying they will be submitting a response once the Invitation to Tender is published.
2. Distortion of competition during market engagement activities was avoided through Publishing the opportunity to take part in market engagement activities on the Central Digital Platform (CDP), [Find A Tender Service \(FTS\)](#).

## **Conflicts of Interest**

1. All officers and decision makers, have been required to complete a Conflict of Interest Declaration form to record any actual, potential, and/or perceived conflicts, along with appropriate mitigations (as appropriate), on the Conflicts Assessment.
2. Approval of this Procurement Strategy by the Strategic Leadership Team (SLT) member and elected member constitutes their declaration that they do not have any actual, potential, and/or perceived conflicts, relevant to this procurement, except where a specific Conflict of Interest Declaration form has been completed and provided, advising differently.
3. The Conflicts Assessment will be kept under review and updated throughout the life of the project (from project inception to contract termination).

## **Local Economy and Social/Added Value**

1. In line with the Council's Added Value Policy and Sourcing Strategy, this procurement will dedicate 15% of the quality envelope weighting to Added Value.
2. Due to the nature of the procurement, only suppliers who win work over the £100k threshold will be liable to deliver against their added value offer.
3. On award of the contract(s), the commissioner will ensure that the Added Value commitment offered at tender stage is stated as a contractual output.
4. Our standard contracts include clauses which refer to penalties for non-delivery against social value commitments.

5. It is recommended the Social Value Officer and commissioner meet at each stage of this procurement to ensure that the Added Value received is aligned with the 3 categories within the Added Value strategy and the Added Value Matrix (Inclusive Economy, Happier and Kinder H&F, Responding to the Climate Emergency).
6. Social Value Portal will be used for evaluating the Added Value element of all tender submissions in compliance with the agreed corporate procurement approach. The commissioner will work closely with the Social Value Officer to ensure commitments are reported regularly on the Social Value Portal by their suppliers.

*Harry Buck, Social Value Officer (Procurement), 25<sup>th</sup> July 2025*

## **Lot Considerations**

### **Lots**

<b>Lot Number</b>	<b>Lot Title and/or Description</b>
Lot 1.	Digital Skills. Delivery of IT qualifications to support learners into employment.
Lot 2.	Construction, Retrofit and Green Skills qualifications to support learners into employment.
Lot 3.	Health and Social Care, and Care to support learners into employment.
Lot 4.	Creative Industries to support learners into employment.
Lot 5.	Science Technology, Engineering Maths, Medicine and Media (STEM3) to support learners into employment.
Lot 6.	Employability Skills to support learners into employment.
Lot 7.	Hospitality and retail to support learners into employment.

## **Duty to Consider Small and Medium-sized Enterprises (SMEs) and Voluntary, Community, and Social Enterprises (VCSEs)**

The procurement has been designed to be appropriate for SME, and VCSE organisation participation. Breaking the procurement into Lots does bring the potential contract values down to more manageable values for smaller organisations. A main issue for participation is that respondents must be a recognised provider of education and training to adults, by the GLA for funding purposes and hold a United Kingdom Provider Reference Number (UKPRN).

## **People Based Considerations**

The Transfer of Undertakings (Protection of Employment) Regulation 2006 (UKSI 2006/246) (TUPE) is not applicable to this contract.

## **Risk Assessment and Proposed Mitigations**

1. There is a financial risk that external funding is reduced or ceased
2. This risk should be reduced or ceased. It is recommended the situation regarding continuance of external funding is monitored, and alternative sources of funding be identified should the risk become high. If the risk is realised it is recommended that the project is stopped immediately, until such time that an alternative source of funding is located, and that LBH&F does not bear any costs. As such it is similarly vital that any engagement does not specify LBH&F as the payer.
3. There are risks with sub-contracting such as:
  4. Poor achievement rates putting the reputation of the lead provider (HFALS) in jeopardy.  
Not achieving funding targets and therefore risking reduction in future allocation.  
Underestimating the costs of administering the contract.  
Second level sub-contracting without approval.  
Failing to complete contracts leaving learners on programme.
  5. Providers will be expected to deliver learner achievement rates of 80% per qualification being delivered. HFALS will actively support subcontractors to improve the quality of their teaching and learning. This will improve the overall quality of the teaching and learning to the students and the organisation. There will also be support provided by HFALS staff during provider Ofsted inspections during the contract period.
  6. On a regular basis HFALS will carry out lesson observations to assess the quality of the teaching and learning experience, this will include but is not

limited to progress reviews and assessments as well the observation of classroom delivery. Subcontractor's delivery staff will be invited to HFALS Continual Professional Development (CPD) sessions to improve their teaching and learning practices.

7. Following any visit from a HFALS member of staff, timely feedback will be provided to the management and the teaching staff of the subcontractor. The observations will form part of the service's standard teaching and learning assessment processes, which enables improvement strategies to be put in place.
8. As part of our contract management process, a contract manager will be provided by HFALS to manage the relationship with the sub-contractor to ensure the quality and scope of the delivery.
9. Support from the HFALS Management Information (MIS) department to provide administration of the data provided from the sub-contractor into the HFALS Individual Learner Record (ILR) which is returned on a regular basis to the funding bodies depending on the delivery type.
10. HFALS will undertake a programme of quality assurance during the term of the contract. This will include, but is not limited to:  
Planned termly meetings and short – notice meetings.  
Interviews with staff and students will include confirmation of learners and eligibility for the funding.  
To ensure that the subcontractors delivery meets with the relevant funding rules for the funding bodies.
11. As part of our procurement process the Fees and Charges Policy will be communicated to all new potential sub-contractors.  
As stated in the funding body subcontracting regulations these fees will be available on the HFALS website.
12. Payments are normally made based on 20% of the total value against a qualification aim on receipt of accurately completed learner enrolment information. The balancing payments will be due monthly to a total of 80% of the weighted qualification aim value as stated on [Find a learning aim \(submit-learner-data.service.gov.uk\)](https://find-a-learning-aim.service.gov.uk). The final monthly payment (20%) will be due on receipt of evidence of learner achievement by HFALS.
13. The table below includes the key risks and proposed mitigations identified as being relevant to this requirement.

Identified Risk	Proposed Mitigations
1. Poor learner achievement rates.	Termly Observation of Teaching Learning and Assessment (OTLA) visits planned.

Identified Risk	Proposed Mitigations
	<p>Continual Professional Development (CPD) activities offered to subcontractor teaching staff.</p> <p>Timetable of delivery including session times, venues and teaching staff.</p> <p>Feedback from learners at OTLA visits.</p> <p>Providers will be researched using information gathered from Qualification Success Rates (QSR), Ofsted reports, audit reports and financial checks.</p>
2. Oversight Challenges	<p>Electronic – registers checked weekly.</p> <p>Non – attending learners withdrawn in a timely manner.</p> <p>Termly meetings with each subcontractor.</p> <p>Copies of achievement certificates required as soon as received from the Awarding Body.</p>
3. Underestimating the costs of administering the contract.	<p>Credit report checked as part of the due diligence process prior to contract execution.</p> <p>Invoices raised per agreed payment amounts and schedule.</p>
4. Failing to complete contracts leaving learners on programme.	<p>Named staff as main points of contact for each organisation.</p> <p>Termly meetings with each subcontractor.</p>
5. Second level sub-contracting without approval.	<p>No further subcontracting allowed in contracts with learning organisations.</p>

*Jules Binney, Risk and Assurance Manager, 15<sup>th</sup> July 2025*

### **Contract Duration Considerations.**

1. The contract length will be a one year plus one year plus one year contract. HFALS will have the option to end the agreement at the end of each year if learner achievement rates are less than 80% or the provider receives a Requires Improvement (Grade 3) rating from Ofsted.

The table below provides an estimated timetable of the competition process through to contact commencing.

Action	Date
1. Key Decision Entry (Strategy)	Monday, 28 July 2025
2. Contracts Assurance Board (Strategy)	Wednesday, 6 August 2025
3. SLT/Cabinet Member/Cabinet Sign-Off (Strategy)	Monday, 11 August 2025
4. Tender Notice Published	Tuesday, 19 August 2025
5. Closing Date for Clarifications	17:00 on Monday, 1 September 2025
6. Clarification responses issued	12:00 noon on Monday, 8 September 2025
7. Closing Date for Tender Submissions	15 <sup>th</sup> September 2025
8. Evaluation and Moderation	16 <sup>th</sup> – 29 <sup>th</sup> September 2025
9. CAB (Award)	Wednesday, 15 October 2025
10. SLT/Cabinet Member (Award)	Monday, 20 October 2025
11. Key Decision Entry (Award)	Friday, 10 October 2025
12. Key Decision Cabinet (Award)	Monday, 10 November 2025
13. Assessment Summaries	Tuesday, 11 November 2025
14. Contract Award Notice (Standstill Period Starts)	Wednesday, 12 November 2025
15. Standstill Period Ends	Thursday, 20 <sup>th</sup> November 2025
16. Contract Engrossment	Friday, 12 December 2025
17. Contract Details Notice Published	Friday, 9 January 2026
18. Contract Signed	Friday, 28 November 2025
19. Contract Start Date	Monday, 1 December 2025
20. Contract Mobilisation and Implementation	21 <sup>st</sup> November – 24th December 2025
21. Contract Start Date	Monday, 5 January 2026
22. Contract End Date (initial term, excluding extension periods)	Tuesday, 1 December 2026
23. Contract End Date (including all extension periods)	Tuesday, 1 December 2026

## Selection and Award Criteria

The criteria and weightings are set out in the table below and will form the evaluation methodology for condition of participation and award.

### **EVALUATION CRITERIA**

<b>Organisation</b>	
<b>Conditions of Participation</b>	<b>Pass/Fail</b>
Ofsted Rating within the last two years of Grade 1 or Grade 2, or “Reasonable Progress” if a new provider.	
Please provide two examples of comparable contracts with other Local Authorities.	
Provide a data storage policy or a statement illustrating the confidentiality of data collated during the activity, including how this will be stored securely, compliant with GDPR.	
Provide evidence of Qualification Success Rates (QAR) of 80% minimum from the previous 2 years.	
Provide evidence of Student satisfaction survey results over 90%.	
United Kingdom Provider Reference Number (UKPRN).	

Question for Responses	% of weighting
Employer engagement	20%
Services being purchased create a positive impact on society. (Social Value)	15%
Student engagement	35%
Resident and employment links	30%

1. There is no Commercial Envelope for this ITT as the GLA mandate that providers of subcontracted provision must receive 80% of the value paid to the Prime organisation being HFALS. The funding value for each qualification is pre – set by the GLA with no competition. This is a completely transparent process which respondents must accept.

Criteria	Weighting	
Quality, including Added Value (100%)	Quality	Added Value
	85%	15%
<b>Total (100%)</b>	<b>100%</b>	

## Contract Management

1. The project sponsor will be The Assistant Director for Adult Learning with Senior Manager Contracts and Funding managing the contract supported by the Deputy Head of Service who will focus on the quality of teaching and learning on the subcontracted provision.
2. The management plan will address the following points:

KPI's, learner attendance rate at least 85%; Achievements at least 80%  
 The Added Value return  
 Unemployed residents

Economically inactive learners  
BAME Learners  
Low-income learners

3. Providers will be expected to deliver learner achievement rates of 80% per qualification being delivered. HFALS will actively support subcontractors to improve the quality of their teaching and learning. This will improve the overall quality of the teaching and learning to the students and the organisation. There will also be support provided by HFALS staff during provider Ofsted inspections during the contract period.
4. On a regular basis HFALS will carry out lesson observations to assess the quality of the teaching and learning experience, this will include but is not limited to progress reviews and assessments as well the observation of classroom delivery. Subcontractor's delivery staff will be invited to HFALS Continual Professional Development (CPD) sessions to improve their teaching and learning practices.
5. Following any visit from a HFALS member of staff, timely feedback will be provided to the management and the teaching staff of the subcontractor. The observations will form part of the service's standard teaching and learning assessment processes, which enables improvement strategies to be put in place.
6. As part of our contract management process, a contract manager will be provided by HFALS to manage the relationship with the sub-contractor to ensure the quality and scope of the delivery.
7. Support from the HFALS Management Information (MIS) department to provide administration of the data provided from the sub-contractor into the HFALS Individual Learner Record (ILR) which is returned on a regular basis to the funding bodies depending on the delivery type.
8. HFALS will undertake a programme of quality assurance during the term of the contract. This will include, but is not limited to:  
Planned termly meetings and short – notice meetings.  
Interviews with staff and students will include confirmation of learners and eligibility for the funding. To ensure that the subcontractors delivery meets with the relevant funding rules for the funding bodies.
9. As part of our procurement process the Fees and Charges Policy will be communicated to all new potential sub-contractors.  
As stated in the funding body subcontracting regulations these fees will be available on the HFALS website.
10. Social Value Portal will be used for evaluating the Added Value element of all tender submissions in compliance with the agreed corporate procurement approach. The commissioner will work closely with the Social Value Officer to ensure commitments are reported regularly on the Social Value Portal by their suppliers.

11. Payments are normally made based on 20% of the total value against a qualification aim on receipt of accurately completed learner enrolment information. The balancing payments will be due monthly to a total of 80% of the weighted qualification aim value as stated on [Find a learning aim \(submit-learner-data.service.gov.uk\)](https://find-a-learning-aim.service.gov.uk) . The final monthly payment (20%) will be due on receipt of evidence of learner achievement by HFALS.

## **Equality and Inclusion Implications**

1. HFALS is committed to eliminating discrimination and encouraging diversity, equality of opportunity and equal treatment for staff, volunteers, contractors, and service users. HFALS mission and values enshrine this core principle. HFALS recognises that this is an essential component of any successful working relationship.
2. Providers will treat all people with dignity and respect, recognizing the value of everyone. Providers must be committed to providing equal opportunities and to avoiding all forms of unlawful discrimination in service delivery and employment on grounds of race, sex, gender reassignment, marital status and civil partnership disability, age, sexual orientation, religion or cultural beliefs and pregnancy and maternity.

## **Providers will:**

3. Employ a workforce that represents the makeup of the borough's population in terms of race, gender and disability. Monitor the recruitment and selection process to ensure it is free from discrimination and openly accountable and will consider and take any appropriate action to address any problems that may be identified because of the monitoring process. Review and monitor all other HR policies and procedures to ensure that they do not perpetuate discrimination.
4. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary. Ensure that access to information and records is as open and transparent as possible. Provide a safe and accessible working environment which values and respects individuals' identities and cultures. Ensure a culture and working environment free from discrimination and harassment. Will comply with its obligations in relation to statutory requests for contract variations and will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices. Encourage and help staff to reach their full potential. Make reasonable adjustments where necessary to assist and support employees and learners in relation to a protected characteristic. Work

in partnership with all sections of the community. Listen and respond to communities' views through consultation and participation in a non-judgemental way within a safe environment. Celebrate and respect the variety of lifestyles and cultures in the Borough. Work with others to provide an environment free from discrimination, harassment and violence.

An Equality Impact Assessment form is included, Annex 1

## **Risk Management Implications**

1. There is a financial risk that external funding is reduced or ceased
2. This risk should be reduced or ceased. It is recommended the situation regarding continuance of external funding is monitored, and alternative sources of funding be identified should the risk become high. If the risk is realised it is recommended that the project is stopped immediately, until such time that an alternative source of funding is located, and that LBH&F does not bear any costs. As such it is similarly vital that any engagement does not specify LBH&F as the payer.

## **There are risks with sub-contracting**

3. Poor achievement rates putting the reputation of the lead provider (HFALS) in jeopardy.  
Not achieving funding targets and therefore risking reduction in future allocation.  
Underestimating the costs of administering the contract.  
Second level sub-contracting without approval.  
Failing to complete contracts leaving learners on programme.
4. Providers will be expected to deliver learner achievement rates of 80% per qualification being delivered. HFALS will actively support subcontractors to improve the quality of their teaching and learning. This will improve the overall quality of the teaching and learning to the students and the organisation. There will also be support provided by HFALS staff during provider Ofsted inspections during the contract period.
5. On a regular basis HFALS will carry out lesson observations to assess the quality of the teaching and learning experience, this will include but is not limited to progress reviews and assessments as well as the observation of classroom delivery. Subcontractor's delivery staff will be invited to HFALS Continual Professional Development (CPD) sessions to improve their teaching and learning practices.
6. Following any visit from a HFALS member of staff, timely feedback will be provided.
7. As part of our contract management process, a contract manager will be provided by HFALS to manage the relationship with the sub-contractor to ensure the quality and scope of the delivery.

8. Support from the HFALS Management Information (MIS) department to provide administration of the data provided from the sub-contractor into the HFALS Individual Learner Record (ILR) which is returned on a regular basis to the funding bodies depending on the delivery type.
9. HFALS will undertake a programme of quality assurance during the term of the contract. This will include, but is not limited to:
  - Planned termly meetings and short – notice meetings.
  - Interviews with staff and students will include confirmation of learners and eligibility for the funding.
  - To ensure that the subcontractors delivery meets with the relevant funding rules for the funding bodies.
10. As part of our procurement process the Fees and Charges Policy will be communicated to all new potential sub-contractors.  
As stated in the funding body subcontracting regulations these fees will be available on the HFALS website.
11. Payments are normally made based on 20% of the total value against a qualification aim on receipt of accurately completed learner enrolment information. The balancing payments will be due monthly to a total of 80% of the weighted qualification aim value as stated on [Find a learning aim \(submit-learner-data.service.gov.uk\)](https://find-a-learning-aim.service.gov.uk). The final monthly payment (20%) will be due on receipt of evidence of learner achievement by HFALS.

*Verified by Jules Binney, Risk and Assurance Manager, 15<sup>th</sup> July 2025*

### **Climate and Ecological Emergency Implications**

1. HFALS is keen to see delivery of ASF and the approved Level 3, Free Courses For Jobs (FCFJ) funded courses that support progression into green occupations, particularly in retrofitting and green construction. The contract will support the delivery of skills that will support the transition to net-zero carbon across a range of industries where jobs are likely to change. Green jobs are predominantly undertaken by men. Women, people from ethnic minority backgrounds, and those with disabilities are still under-represented across the sector.
2. The GLA Fund HFALS and have Green Skills as a key priority for providers to deliver to support progression into employment in this growing area. Qualifications in this subject area are available for delivery, and many are currently under development by the awarding bodies for delivery from 01/08/2025.
3. HFALS is currently the Adult Community Education (ACE) lead for the West London Green Skills Hub funded by the London Mayor. Research for the Hub has shown 75% of current 'green jobs' are in the Energy efficiency – Retrofit, insulation, renewables sector. West London Local Authorities are embarking

on an ambitious programme of domestic retrofitting, presenting employment opportunities.

*Verified by Charlotte Slaven, Head of Climate Strategy & Engagement, 11<sup>th</sup> July 2025.*

## **Local Economy and Social Value Implications**

1. In line with the Council's Added Value Policy and Sourcing Strategy, this procurement will dedicate 15% of the quality envelope weighting to Added Value.
2. Due to the nature of the procurement, only suppliers who win work over the £100k threshold will be liable to deliver against their added value offer.
3. On award of the contract(s), the commissioner will ensure that the Added Value commitment offered at tender stage is stated as a contractual output.
4. Our standard contracts include clauses which refer to penalties for non-delivery against social value commitments.
5. It is recommended the Social Value Officer and commissioner meet at each stage of this procurement to ensure that the Added Value received is aligned with the 3 categories within the Added Value strategy and the Added Value Matrix (Inclusive Economy, Happier and Kinder H&F, Responding to the Climate Emergency).
6. Social Value Portal will be used for evaluating the Added Value element of all tender submissions in compliance with the agreed corporate procurement approach. The commissioner will work closely with the Social Value Officer to ensure commitments are reported regularly on the Social Value Portal by their suppliers.

*Harry Buck, Social Value Officer (Procurement), 25<sup>th</sup> July 2025*

## **Consultation**

1. The Greater London Authority (GLA) have approved HFALS to offer subcontracting arrangements for the 2025/26, 2026/27, and the 2027/28 academic years.

## **LIST OF APPENDICES**

**Annex 1 – Equalities Impact Assessment (EIA)**

## **Exempt Appendix A**

Financial Impact.

## **Project Financial Details**

### **Exempt Appendix A**

#### **Financial Impact**

- Annual Cost: Up to £584,000 per year for subcontracted provision.
- Contract Duration: Three-year period, totalling £1,752,000.
- Funding Sources:
  - Grant funded by the Greater London Authority (GLA).
  - Additional funding from the Department for Education (DfE).
- Subcontracting Plan:
  - Provision to be delivered by a pool of approved learning organisations.
  - No planned annual uplift in funding between Year 1 and Year 3.
- Due Diligence:
  - GLA will conduct its own due diligence to validate selected providers.
- Management Fee:
  - HFALS will retain a management fee of 15%–20% from subcontracted organisations.
  - This fee covers procurement and contract management costs.
  - For the 2026/27 academic year, the retained percentage will remain within the 15%–20% range.

Completed by Will Stevens, Finance Manager Place, 20/7/25

#### **Annex 1**

#### **Equalities Impact Assessment (EIA)**

  
EIA HFALS  
procurement.docx