Croydon Adult Learning And Training (CALAT) Adult Skills Fund (ASF) Subcontracting Policy 2026/27 (Draft)

Policy Approval

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Owner: Strategic Skills and Partnership Lead
Approved By: Director of Planning and Sustainable Regeneration
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1. Purpose

Croydon Adult Learning and Training (CALAT) is the London Borough of Croydon's adult education service. It provides learning opportunities for adults aged 19+ across Croydon through a mix of academic, vocational, community and employability programmes. CALAT delivers courses in areas such as ESOL, English, maths, digital skills, childcare, business accounting and customer service, health and social care, languages, family learning, creative arts, independent living and programmes for adults with learning difficulties and disabilities.

CALAT Vision

To provide an outstanding curriculum which will tackle skills gaps, increase individuals' earning potential, support economic growth; reduces social isolation, improve health and wellbeing and enable all learners to realise their aspirations and transform their lives.

C*reate*
A*spire*
L*earn*
A*chieve*
T*ransform.*

This policy sets out how CALAT and the London Borough of Croydon will subcontract Adult Skills Funded (ASF) provision where this supports the Council's strategic objectives, complies with Greater London Authority (GLA) funding requirements and delivers high-quality learning opportunities for Croydon residents.

This policy applies to all subcontracted Adult Learning provision delivered using Adult Skills Fund (ASF), Tailored Learning (TL), other national, regional, or externally funded adult learning programmes administered by the Council.

2. Policy Statement

CALAT will operate as the accountable body for Adult Skills Fund provision. Whilst learning delivery may be commissioned to approved providers, accountability for funding compliance, safeguarding, quality assurance, performance monitoring and learner outcomes remains with the Council.

Subcontracting will be used where it:

- Improves access to learning for residents.
- Enables delivery within priority resident groups that are furthest away from the labour market.
- Provides specialist expertise.
- Supports progression into employment, further learning and qualifications.
- Increases flexibility in responding to local labour market needs.
- Improves value for money and learner outcomes.

CALAT recognises the importance of local community-based provision and commissioning activity will seek to:

- Engage disadvantaged communities.
- Support progression pathways.
- Reduce barriers to participation.
- Enables delivery within priority resident groups that are furthest away from the labour market.

3. Strategic Objectives

All subcontracted provision must support local, regional and national priorities particularly those set out in the following plans and strategies:

- The Executive Mayor of Croydon's Business Plan.
- Croydon's Growth Plan
- London's Local Skills Improvement Plan and the London Mayor's London Growth Plan and Inclusive Talent Strategy

Delivery will support pathways into local jobs within sectors identified in the above plans including:

  - Health and Social Care
  - Digital
  - Green Industries
  - Logistics
  - Creative and Cultural Industries
  - Professional Services.
  - Construction

4. Principles

CALAT will apply the following principles:

Learner First: All decisions will prioritise learner outcomes, accessibility, safeguarding and progression.

Quality: All subcontractors must demonstrate a proven track record of delivering high-quality education and training.

Transparency: All subcontracting arrangements retained funding and performance information will be publicly available in accordance with GLA requirements.

Value for Money: Subcontracting must maximise delivery funding and minimise unnecessary administration.

Accountability: The Council remains fully accountable to the GLA for all subcontracted activity.

5. Provider Selection

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

- the Council's Contract Standing Orders
- GLA ASF funding and performance management rules 2026-2027*
- public procurement legislation

* this prohibits all forms of second-level subcontracting of education and training

The assessment will include:

- Financial health checks.
- Credit and insolvency checks.
- Safeguarding compliance.
- Insurance verification.
- Ofsted history.
- Quality performance.
- Equality and diversity arrangements.
- Data protection compliance.
- Capacity and capability assessment.
- References.
- Experience of Adult Skills Fund delivery.

6. Management fees

Management fees for both Adult Skills Fund Core and Tailored Learning will be up to 20% of the provision to be delivered. This amount represents the costs that we incur in identifying, selecting, managing, and administering all subcontracted provision as well as

- Strategic planning.
- Provider/Contract management.
- Funding compliance.
- Data management.
- Safeguarding oversight.
- Audit activity.
- Quality assurance.
- Performance monitoring.
- Learner support administration.

This figure will be viewed annually and published transparently as part of our sub-contracting policy.

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

- Contract management support.
- Curriculum planning support.
- Performance, KPI and data monitoring Quality improvement support.
- Staff development opportunities.
- Safeguarding advice.
- Funding compliance advice.
- Data and ILR support.
- Access to labour market intelligence.
- Networking and partnership opportunities.
- Support preparing for inspection or external review.

7. Contractual Arrangements

All subcontractors will enter into a formal contract with London Borough of Croydon that includes:

- Service specifications.
- Performance expectations.
- Funding rules.
- Data requirements.
- Audit expectations.
- Safeguarding obligations.
- Equality obligations.
- Quality standards.
- Termination clauses.
- Business continuity arrangements.
- Learner protection requirements.
- Social Value requirements

Payment arrangements and schedules will be confirmed within individual contracts Payments will be made following validated delivery and performance data and subject to compliance with funding rules.

8. Performance Management

Subcontractors will be monitored agreed outcomes, KPIs and success measures which may include:

Participation	Quality	Employment Outcomes	Compliance
• Enrolments • Priority learner groups • Equality performance	• Retention • Achievement • Progression • Learner satisfaction • Observation outcomes	• Employment progression • Sustained employment • Further learning progression	• Funding compliance • Data quality • Audit findings • Safeguarding compliance.

9. Quality Assurance

CALAT will operate a comprehensive incorporating contract management and quality assessment quality assurance framework including:

- Regular contract review meetings.
- Provider performance reviews.
- Data audits.
- Learner file sampling.
- Learner interviews.
- Teaching observations.
- Compliance monitoring visits.
- Self-assessment processes.
- Continuous improvement planning.

Quality assurance functions will not be subcontracted and will remain under Council control. The Council will support continuous improvement through joint observations, moderation, sharing of best practice, curriculum development activity, staff development opportunities and quality improvement planning.

10. Safeguarding

All subcontractors must:

- Have robust safeguarding arrangements.
- Meet Prevent Duty requirements.
- Promote learner wellbeing.
- Report safeguarding incidents immediately.
- Participate in CALAT safeguarding audits and reviews.

The Council will maintain strategic safeguarding oversight across all provision.

11. Equality, Diversity and Inclusion

All subcontractors must demonstrate how they will:

- Advance equality of opportunity.
- Improve participation amongst under-represented groups.
- Meet Public Sector Equality Duty requirements.
- Provide accessible learning.
- Reasonably adjust provision for learners with additional needs.

Particular consideration will be given to:

- Disabled learners.
- ESOL learners.
- Young adults aged 18-25.
- Residents in deprived communities.
- Learners furthest from employment.

12. Risk Management

CALAT will maintain oversight of key risks including:

- Provider failure.
- Financial instability.
- Poor-quality delivery.
- Funding irregularity.
- Learner safeguarding incidents.
- Data breaches.
- Poor learner outcomes.

Contracts will include improvement notices, recovery plans and termination rights where necessary.

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. Publication

In accordance with GLA subcontracting requirements, CALAT will annually publish:

- This Subcontracting Policy.
- Details of subcontracted providers including provider name, UKPRN, Contract start and end date
- Funding allocations from the GLA and paid to providers
- Funding retained for contract management
- Delivery rationale.
- Performance information where appropriate.

15. Review

This policy will be reviewed annually and updated to reflect:

- Local, regional and national priorities.
- Changes to ASF requirements and GLA performance and funding rules.
- Procurement legislation
- Learner and stakeholder feedback.
- Lessons learned from contract performance.