

KENT COUNTY COUNCIL – RECORD OF OFFICER DECISION

Executive

DECISION TAKEN BY:

David Adams, Interim Deputy Director – Effectiveness, Sufficiency and Skills

DECISION NO:

OD-26-00003

For publication

Subject matter: Creation of an in-house Holiday, Activity and Food Programme Team

Cabinet Member decision to which this action relates:

24/00076 [Decision - 24/00076 - Holiday Activity Fund](#)

Decision:

To establish an in-house HAF Programme Team within Children, Young People and Education (CYPE) and to transfer the coordination and management functions currently undertaken by The Education People (TEP) into Kent County Council (KCC), thereby completing the implementation of the Cabinet Member decision 24/00076

Reason(s) for decision:

KCC has commissioned TEP to manage its HAF programme since April 2021. TEP have delivered the programme through the use of grant agreements with HAF delivery partners. The use of grants does not sit comfortably with the Council's financial procedures. Over time, the value of grants to some providers became significant.

Decision 23/00009 (March 2023) authorised acceptance and deployment of future HAF grant allocations.

In October 2024, the Cabinet Member for Education and Skills took the decision above (24/00076). This approved a new model for delivering and commissioning the Council's HAF programme from April 2025. The decision moved the Council away from using grant awards to a formal procurement process to commission its HAF delivery partners, to ensure compliance with the Procurement Act 2023. Formal contracts are now in place with 41 providers.

It had been anticipated that Government would announce a three-year HAF funding settlement in autumn 2024. Instead, a one-year funding extension was announced in February 2025. Procurement work proceeded to establish the HAF delivery partner framework, but the transfer of the HAF Team from TEP to KCC was delayed.

Government subsequently confirmed multi-year HAF funding (2026–2029) in August 2025, enabling completion of the operating model by bringing the HAF team in-house.

The changed contractual relationship with the HAF delivery partners, which is now direct with KCC rather than TEP, means the current commission with TEP to deliver HAF is no longer appropriate. TEP cannot manage the HAF delivery partners on KCC's behalf. The change requires an in-house HAF team to lead and manage the programme, to ensure the annual grant allocation of c£5.6m is

effectively used to support the intended recipients of the programme (children and young people receiving free school meals), to work with HAF delivery partners to improve the programme offer, to encourage new providers on to the framework, and to guarantee that spend conforms with the grant conditions.

The delivery model (compliant procurement and in-house programme management) remains unchanged.

The programme costs remain contained within the ring-fenced HAF grant; no General Fund impact arises.

Creating the in-house HAF team is the final step in fully implementing the Cabinet Member's decision.

Financial Implications:

KCC receives a HAF grant from Government. This is c£5.6m annually. The grant is ringfenced to HAF delivery.

The terms of the HAF grant currently allow 10% of funding to be used for management of the programme (c£560k). This reduces to 7.5% from April 2026 (c£420k). The costs of the current TEP HAF team are met from within this allocation. TEP charge KCC £293,227 for the staff costs, including any overhead and profit. The estimated cost of the same staff in KCC, including employer contributions to the Local Government Pension Scheme, is £243,099. The cost of an in-house team will be c£50k cheaper than commissioned service from TEP. One off transfer costs of c£10-12k will reduce this in year one. This saving will help off-set the reduction in the percentage of grant that can be used for management costs.

In the event that grant funding does not continue past 2029, redundancy costs may be incurred. These would be charged to the management allowance of the grant.

Legal implications:

The decision is likely to result in a "transfer of undertakings, protection of employees" scenario. Appropriate advice and actions will be taken when implementing the decision to conform to requirements.

The current commission with TEP is via an "additional works request" not the core contract. This is an annual commission with no ongoing commitment to work. TEP have been informed of the decision.

Work to implement a HAF framework of providers has already ensured compliance with the Procurement Act. However, as a separate legal entity, TEP cannot manage the contracts on KCC's behalf, nor complete key activities that require use of KCC's core systems.

Equality Implications:

An equalities impact assessment screening was completed to inform the Cabinet Member's decision (24/00076). This concluded that there were no individual groups that were significantly more impacted by the decision and individuals with protected characteristics would continue to be supported through the HAF Programme.

The decision to create an in-house HAF team formed part of the Cabinet Member's decision.

Comments received from any Members or Officers consulted:

The Cabinet Member for Education and Skills supports this decision. We are committed to maximising the impact the HAF programme can have in supporting children and young people, particularly the most vulnerable, and integrating this support in to the Council's wider agendas, such as reducing school non-attendance, increasing opportunities for children with SEND and youth diversion activity.

Any alternatives considered and rejected:

The option of continuing to commission TEP to manage the HAF programme was considered and rejected. The changed contractual relationship between KCC and HAF providers cannot effectively work with a third party (TEP) in between.

Any conflict of interest declared by any executive member consulted by the decision maker and any dispensation granted by the Proper Officer:

None.



22nd January 2026

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signed

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date