

Apprenticeship funding audit

9 December 2019
10:30 - 15:30

- > Karl Bentley, ILR funding audit manager at RSM
- > Nick Linford, author of the Complete Guide to Funding Apprenticeships

LSECT
LEARNING & SKILLS
EVENTS, CONSULTANCY & TRAINING

Agenda

- Background to review
- The assurance review approach
- Common themes
- Subcontracting
- The role of DSATs in the new assurance approach

 **RSM**

What is Assurance?

- The ESFA assurance approach is a financial review only
- Confirms funding claimed is compliant with the funding rules on a sample basis and wider data review
- Reports on non-compliance only
- Does not cover educational content or quality
- We don't grade you
- We don't give out gold stars



FM36 Apprenticeship

Referred to as D4 FM36

Maximum sample size of 50 (up from 30)

Nine questions = 33 critical factors

Some overlap with existing review arrangements

- | | |
|------------------------------------|-------------------------------------|
| • Eligibility | • Duration |
| • Age | • Delivery location |
| • Employed status | • Distance learning |
| • Employment Hours | • Breaks in learning |
| • Apprenticeship Training Agencies | • Learning Support |
| • AGE Grants | • Start and end dates plus activity |
| • Prior learning | • Achievement |



New areas for Funding Assurance Review

New areas for review

- Wider Eligibility
- Negotiated Price – initial assessment
- English and maths
- 20% off the job – quantity, delivery, progress and completion
- Written agreement, commitment statement and Apprenticeship Agreement
- Payment of employer co-investment
- Payment of price over funding band maximum
- Additional payments for 16-18 or 19-24 with EHCP and Care Leaver Bursary
- Small Employer – co-investment waiver
- Completion and end point assessment



Eligibility

Once upon a time this was relatively straightforward!

- Apprentice has confirmed three-year residency in UK/EU/EEA
- Confirmation of employment (usually done through signed Apprenticeship Agreement or Individual Learning Plan (ILP))
- Confirmed they work more than 16 hours per week
- Does not already have level 4 or high qualification if undertaking an Apprenticeship at level 4 or lower



Eligibility – more than residency

As per 2019/20 Apprenticeship funding rules for training providers

P79 To use funds in the employer's apprenticeship service account or government-employer co-investment, the individual must not:

- **P79.1** be undertaking another apprenticeship;
- **P79.2** be undertaking training funded through AEB, where that training will:
- **P79.2.1** replicate vocational and other learning aims covered by the apprenticeship standard or framework, including English and maths;
- **P79.2.2** offer career related training that conflicts with the apprenticeship aims; or
- **P79.2.3** be taking place during working hours. Where an apprentice has more than one job, working hours refers to the hours of the job the apprenticeship is linked to.
- **P79.3** be in receipt of any other direct DfE funding during their apprenticeship programme; this includes any other DfE funded FE/HE programme including programmes funded by a student loan, but excludes funding outlined in P79.2; or
- **P79.4** undertake any part of an apprenticeship whilst on a sandwich placement as part of a degree programme.

P80 As an exception to P79, an individual may commence an apprenticeship, and attract funding, where they have less than four weeks to completion of an existing Government/DfE/DWP funded course.



Eligibility – evidence pack requirements (P290)

290.3 Your assessment and evidence of eligibility for funding and a record of what evidence the apprentice has provided, including that the apprenticeship leads to substantive new skills and that the learning is materially different where the apprenticeship is at the same level as, or lower level than, prior qualifications. This assessment must include an analysis of the apprentice's existing knowledge, skills and behaviours versus those required to complete the apprenticeship. This also includes evidence of prior attainment for English and maths. This evidence could include the following:

- 290.3.1 information from the individual's **personal learning record**
- 290.3.2 evidence of proof of equivalency from **UK Naric** where an individual has an international qualification
- 290.3.3 **details of previous qualifications** including modules/units undertaken compared to the content of the apprenticeship, demonstrating how they are materially different where appropriate



Eligibility – evidence pack requirements (P290)

- 290.3.4 **skills gap analysis**, demonstrating the new skills needed by the individual and how the apprenticeship will address these
- 290.3.5 details of any **relevant experience and achievements**, both inside and outside their current working role

For a 16-18 new entrant we can be pragmatic in our approach, for older apprentices and those that have been in post for a period of time it's for the provider to demonstrate there is sufficient evidence to confirm eligibility. However, all Apprentices must have an initial assessment regardless of age.

The recent OTJ guidance makes it clear when considering prior learning and eligibility:

52.1 Work experience (this is particularly important where the apprentice is an existing employee);

Do you have a robust assessment towards the results of skills scan?

Do you review the results with Apprentice and Employer?

Do you document your reasons why an Apprentice is eligible?



Wider Eligibility

There are also further considerations for eligibility and evidence

- **P290.4** Evidence that the apprentice will spend at least 50% of their working hours in England over the duration of the apprenticeship including time spent on off-the-job training. Where the business footprint is larger than England this could include a roster for a typical month for the apprentice along with written confirmation from the employer.
- **P290.5** Confirmation that the apprentice is not;
- **P290.5.1** enrolled on another apprenticeship
- **P290.5.2** enrolled on a DfE funded HE/FE programme (excluding AEB) where that programme is more than 4 weeks from completion
- **P290.5.3** enrolled on a AEB funded programme where that programme does not comply with rules P79.2.

So as part of your application/enrolment process are you covering all these areas to confirm an Apprentice is eligible for the programme?



Eligibility to Negotiated Price

Initial Assessment – more than maths and English

ESFA does not mandate how a provider assesses or determines prior learning, just that **it must be done** and the findings taken account of. The relevant apprenticeship framework or standard should normally be used as the basis for initial assessment, i.e.:

- What is the goal and what is the apprentice trying to achieve?
- Where are they currently against this goal?
- How much of the content is new to them?
- Do they require significant and sustained new learning?

The ESFA does not mandate how prior learning should be recorded, only that the initial assessment must be documented in the evidence pack and summarised on the commitment statement. **Initial assessment is subject to audit checks and funds may be recovered where initial assessment has not taken place, has not been evidenced or a price reduction has not been made to reflect the prior learning.**

<https://www.gov.uk/government/publications/apprenticeships-recognition-of-prior-learning/apprenticeships-initial-assessment-to-recognise-prior-learning>



Negotiated Price

Assurance review question 3i asks:

Funds within the employers digital account or government employer co-investment are **used for funding evidenced eligible costs and activities** within the agreed price, including any subcontracted delivery of training and on-programme assessment, up to the band maximum, and for training and end-point assessment (required for apprenticeship standards) **as recorded in the written agreement.**

As auditors we're looking for two components

Price is made up of Eligible Costs

Price and written agreement reconcile



Negotiated Price

Initial Assessment – more than maths and English

Following on from eligibility the ESFA published new guidance in March 2019 regarding prior learning and negotiated price

- Recognition of prior learning extends beyond English, maths and existing qualifications;
- All the knowledge, skills and behaviours set out in the standard should be considered in reviewing the prior learning of the apprentice;
- Recognition of prior learning is part of the learner eligibility assessment;
- Apprenticeships could be poor value for money and unnecessarily long if training covers areas that the apprentice already knows, and public funding should not be used for learning which is not new;
- Initial assessment is vital to ensure high-quality apprenticeships and Ofsted inspections look for evidence of a robust initial assessment.



Negotiated Price

Initial Assessment – more than maths and English

The funding band of the apprenticeship is based on an apprentice requiring the full content of the apprenticeship, and in the case of standards this means all the listed knowledge, skills and behaviours.

100% of content = 100% of price

ESFA funding rules state that the apprenticeship content, duration and price must be reduced where the individual has relevant prior learning.

Prior learning must be factored into the price

Apprenticeship funding must not be used to pay for, or certify, the delivery of existing knowledge, skills and behaviours as this represents poor value for money.

There are audit checks to ensure a price reduction has been made to account for prior learning and the reduced training content required. To meet the ESFA funding rules, the training element within the apprenticeship must have a minimum duration of 12 months with at least 20% off-the-job training.



Negotiated Price

Any price agreed with an Employer can only be made up of eligible items as specified in paragraph P101 – if you don't document we don't know what's in there

If you include elements from P105 then your agreed price is in error and will need to be amended

- **P292.1** A breakdown of the total negotiated price (TNP1), associated with the delivery of training and on-programme assessment, against the headings of any of the eligible costs listed in P101. This breakdown must not include any ineligible cost.

What we are looking for is a breakdown of what makes up your price into the various elements e.g. training costs, material, registration with awarding body, certification etc. What we don't ask for is a breakdown of your costs and we certainly will not be asking how much profit or contribution you make per Apprenticeship



Role of Employer

If you negotiate a reduced price with the employer as they are delivering some of the content this is not compliant with funding rule P204:

- You must not offset the negotiated price with the costs of any service provided by the employer. If the employer is legitimately delivering relevant training or an eligible cost supported by these rules then this must be included into the overall price. The cost of the apprenticeship must be transparent.

If a provider is reliant on the employer delivering some of the provision then the employer is a subcontractor and will need to be paid as such.

The total negotiated price will be the provider's price combined with the employer's cost

However, if no money is changing hands then the employer is not a subcontractor

"The acid test is whether apprenticeship funding is being used: if the employer is accessing apprenticeship funding then the employer is a subcontractor of the main provider / employer-provider and the subcontracting rules apply, including the requirements associated with ROATP; if the employer is not accessing apprenticeship funding then they are not considered to be a subcontractor"



Common Errors from funding assurance review

Following completion of a number of funding assurance reviews the key issues identified were:

- Written agreements not signed so unclear if negotiated price has actually been agreed
- Negotiated price on ILR does not reconcile to agreed price on written agreement e.g. change from standard to framework and contract not updated
- Negotiated price not supported by a breakdown – now a requirement from 2019/20
- Prior attainment not being considered as part of negotiated price – progression of level 2 to 3 etc.
- Results of skills scan not being considered or work experience and time in post – 100% of price for 95% of content
- Wrong price recorded on ILR



20% Off the Job

Assurance review question 3xi states:

The evidence pack must contain details of how the 20% off the job training will be **quantified** and **delivered**

As auditors we're looking for four components

20% Quantified i.e.
How much is 20%

20% delivered
Delivery plan = 20%

Progress against off the job
requirement

Minimum of 20% at completed



Off the job – what counts?

P46 Off-the-job training is a statutory requirement for an English apprenticeship. It is training which is received by the apprentice, during the apprentice's normal working hours, for the purpose of achieving the knowledge, skills and behaviours of the approved apprenticeship referenced in the apprenticeship agreement. By normal working hours we mean paid hours excluding overtime.

P47 Off-the-job training must be directly relevant to the apprenticeship. It can include the following:

- **P47.1** the teaching of theory (for example, lectures, role playing, simulation exercises, online learning, and manufacturer training);
- **P47.2** practical training, shadowing, mentoring, industry visits, and participation in competitions; or
- **P47.3** learning support and time spent writing assessments/assignments.



Off the job – what doesn't count

P48 Off-the-job training does not include:

- **P48.1** training to acquire knowledge, skills and behaviours that are not required in the standard or framework;
- **P48.2** progress reviews or on-programme assessment required for an apprenticeship framework or standard; or
- **P48.3** training which takes place outside the apprentice's normal working hours.

ESFA – 'Off the job is a quantitative measure, not a qualitative measure.'

However, assurance work will seek to confirm that the calculated number has been met but also that the activity was relevant to the Apprenticeship (so it is a bit of a qualitative measure)



20% Off the Job Calculation

Version 6 clarified the rules for starts between 1 May 17 and 31 July 2018:

- Annual leave cannot be excluded – calculation of OTJ is based on 52 weeks
- Any start after the rules were clarified must be based on 52 weeks

For starts from 1 August 2018, statutory annual leave can now be deducted – 28 days only. Any additional annual leave over this cannot be excluded.

- Calculation is now based on 46.4 weeks

OTJ guidance published in March 2019 also offered this advice:

For starts in the period 1 May 2017 to 31 July 2018 (prior to the annual leave rule change) if the deduction of annual leave is the sole reason why there is non-compliance against the off-the-job training policy (i.e. annual leave has been deducted before this deduction was part of the policy) then **this will not be considered a funding error.**

Audit will probably still treat it as a controls/compliance error and report accordingly



Starts from 1 August 2019

The data requirements for starts in the current academic year have changed:

- Start date is when programme commences (all documentation in place supports this)
- Planned end date is the end of the practical period
- EPA time is not included in this date
- Off the job is calculated between start date and the practical period only – EPA time is excluded (and has been since May 2017)
- The off 20% off the job required hours must be recorded on the ILR (or planned hours)
- New field in 2020/21 to record hours at end of programme – validation?



20% off the Job

How much is 20% for each Apprentice?

Weekly hours paid	20%	Number of weeks minus Statutory Annual Leave	Actual Duration (months)	Gateway Duration (months)	Duration from start to gateway (months)	Total hours after Statutory Annual Leave and assessment time removed
30	6	46.4	24	1 month	23	533.6
35	7	46.4	36	3 months	33	893.2
40	8	46.4	48	6 months	42	1299.2

NB The rules for annual leave are for statutory leave only - 28 days



Calculating off the job

Contracted hours x weeks in a year (46.4) / 12 x number of months for practical period x 20%

$$35 \times 46.4 / 12 \times 21 \times 0.2 = 568.4$$

$$37.5 \times 46.4 / 12 \times 21 \times 0.2 = 609$$

$$40 \times 46.4 / 12 \times 21 \times 0.2 = 649.6$$

Has your delivery plan taken account of varying contracted hours?



20% Off the job - delivered

Planning OTJ delivery

Contracted Hours and duration	20% Off the job requirement	Delivery	Balance
37.5 hours per week with 45 month practical period duration with 3 month EPA (48 month total programme duration)	1305 hours	Day release of 7 hours per day for 38 weeks for 3 years =798 hours Support in work place – 1 day per month (7.5 hours) for 9 months = 67.5 hours	1305 – 865.5 439.5 shortfall How will these hours be delivered?



Off the job requirement – Early completion

Early completion is allowed – however, the requirements of 20% still don't appear to have been answered.

Is it hours required for the programme or hours required up to completion?

If it's the latter the ESFA may want to revisit the price – is the reason for early completion prior knowledge that wasn't accounted for in the price?



Commitment Statements

The Commitment statement is a key document for the process and a range of issues were identified Non compliance with requirements of what needs to be included in the Commitment Statement – see full list at paragraphs 65.1 to 65.9 of 19/20 funding rules

- **P65.4** The amount of off-the-job training that will be delivered to meet the minimum 20% requirement (see paragraphs P47, P48 and P54 for what can and cannot be included in this calculation). The individual's prior learning must be taken into account before calculating the off-the-job requirement and designing the programme.
- **P65.5** The planned content/components and schedule of eligible training (and for standards the end-point assessment). This should include key milestones for mandatory or other qualification achievements. It should also be clear if the component has been used towards the calculation of the minimum 20% off-the-job training requirement.

The commitment statement is a fundamental part of the evidence to support the calculation and planning of 20% off the job.



20% Off the Job

- Can you clearly evidence participation and progress against OTJ requirement
- Retention of digital evidence – will data from year 1 still be available in year 3?
- Withdrawals – can you evidence how much of the 20% OTJ has been completed up to the point of withdrawal and is it inline with plan?
- Some activity will not be considered as OTJ – evidence of work based activity linked to the standard or repeated activity still being claimed as OTJ e.g. how many cars does an Apprentice need to wash before the activity doesn't count?
- Language used in recording activity – 'I was trained in...' changes to 'I did XXX and was checked by XXX' – how much of the latter is on the job but still claimed as off the job
- Misclassification of activity – maths and English being flagged as OTJ
- Functional Skills ICT where required as part of the framework or standard can contribute to 20% OTJ



20% Off the Job

20% means 20%

- We have tested achievements and are actively looking for 20% OTJ over the duration of the Apprenticeship
- Where an Apprentice has achieved and has not completed 20% they will be deemed ineligible subject to para 71 of additional guidance

Ensure checks are implemented to confirm 20% has been completed before putting an Apprentice forward for Gateway or a Framework certificate claim



Common errors at funding assurance review

- 20% not calculated or calculated incorrectly
- 20% requirement not documented
- Delivery model is insufficient - going into the workplace twice a month for three hours at a time won't reach 20%, nor will day release at the provider
- No plan to work with employers to confirm how evidence will be collated to support their contribution to the 20% requirement – does the activity relate to the framework/standard or is it employer specific?
- Poor record keeping on progress against 20% requirement or counting repeated activity as OTJ
- Claiming maths and English as OTJ
- Not claiming functional skills ICT as OTJ



Apprenticeship funding audit

Returning after lunch for a 13:50 restart

- > Karl Bentley, ILR funding audit manager at RSM
- > Nick Linford, author of the Complete Guide to Funding Apprenticeships

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Employer Co-Investment

Assurance review question 8 asks the following questions:

8i: The employer co-investment recorded on the ILR is **evidenced by a transfer of funding visible in the provider's (or subcontractor's) financial systems**; this will typically be in the form of a provider invoice and corresponding employer payment for a provider. For employer providers, they must evidence how the costs are calculated.

8ii: The **employer has paid the full difference between the band maximum and the total cost** where the employer provider evidences costs that are more than the band maximum or, in the case of a provider, where they have negotiated a price is above the maximum.

As auditors we're looking for two components

Co-investment payments have been invoiced and collected

Any value agreed above the funding base has been paid by the Employer

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Employer Co-investment

Most common issues are:

- Co-investment not recorded on the ILR even when it has been collected
- Co-investment not paid by Employers and Apprentice has been on programme for more than 90 days
- Co-investment hub report (now 'Submit Learner Data') not checked to determine if Levy paying employer should be contributing
- No checks on subcontractors collecting co-investment payments
- Contracts including contradicting information on who will collect co-investment payments

And if you claim a completion payment without having recorded the co-investment in TNP1 the funding system will stop the payment – if you've already claimed that will be recovered



Employer Co-investment

Payment over the band

Where providers have negotiated over the band we also need to ensure that element is also being collected.

We've been asked can we collect at the end, simple answer is no. The expectation is that the funding agreed over the band should be collected throughout the programme, the same way that a provider is funded by the ESFA.

Same principles apply, invoices and evidence of payment will be required along with recording values on the ILR.



Small Employer Waiver

Assurance review question 9iv asks:

The employer declaration confirms that the employer has 49 or fewer paid full or part-time employees and so confirms eligibility for an additional payment

As auditors we're looking for two components

Declaration signed by Employer
is in place and with appropriate
wording

Apprentice is eligible for Small
Employer Waiver



Small Employer Waiver

What we're looking for:

- Confirmation of age of Apprentice and supporting evidence where claimed for 19-24 (EHCP or letter from Social Services confirming recent care leaver)
- Declaration has been completed and signed (preferably confirming actual numbers)
- Declaration has appropriate wording - average of 49 or less employees for the 365 days prior to the start of the Apprenticeship
- Review of funding and monitoring report where concerns are raised about an employer – respond accordingly

NB If possible providers should include a clause on the declaration advising them that if any information provided is found to be incorrect they will be liable for the 10% Co-investment contribution



Small Employer Waiver

Most common issues are:

- No small employer declaration in place as alternative evidence used such as Health and Safety Assessments
- Incorrect wording of declaration
- Declaration not being revisited where an employer takes on additional Apprentices later in the year
- Not claimed despite having the evidence (under claims)
- Small employer waiver flagged against ineligible Apprentices
- Funding and monitoring reports suggesting that flagged employer(s) are not eligible



Apprenticeship Agreement

The Apprenticeship Agreement is a document signed by Apprentice and Employer only. It sets out what Apprenticeship is being studied and now must include start and end date of practical period, programme planned end date and number of off the job hours required. It's this document that also confirms in law that recognises the individual as an Apprentice.

- **P26** If the apprenticeship agreement is incomplete and/or does not meet the statutory requirements the individual will not have a valid agreement and will not be eligible to receive funding.

Any missing or incomplete Apprenticeship Agreements are treated as funding errors.



Redundancy

- **P72** If an apprentice is made redundant, we will continue to fund their training even if they cannot find another employer. Apprentices who are made redundant within six months of their final day will be funded to completion. We will also fund apprentices' training for 12 weeks where they are made redundant more than six months from their final day, while they seek a further apprenticeship agreement.
- **P251.1** make reasonable efforts to find the apprentice a new employer;
- **P251.2** record the change in employment status in the ILR. This must match the date the apprentice became redundant and you must retain a copy of the apprentice's redundancy notice in the evidence pack; and
- **P251.3** record apprentices more than six months from the final day of their apprenticeship as having left their apprenticeship if a new employer is not found within 12 weeks of them becoming redundant.

Where evidence of redundancy is not available Apprentice will need to be withdrawn when employment ended

Where employment statuses are not recorded correctly Apprentices did not qualify for six month funded activity



Withdrawals

- **P256** If an apprentice leaves without completing their apprenticeship, the last date of learning, including the apprenticeship programme learning aim, is **the date you have evidence the apprentice was still in learning for any learning that was part of their apprenticeship.**

Not the date you were told by the employer the Apprentice had left

- **P258** You must agree with the employer any reimbursement for employer co-investment made for learning paid for, but not undertaken; or learning delivered, but not yet paid up to the employee's leave date, or the date of their break in learning, as needed.

You are obliged to pay back co-investment to an employer e.g. employer pays £250 (5%) on a £5,000 negotiated price at start of programme.

Apprentice leaves halfway through programme so refund is required

Money to pay back would be £50 for completion element and £100 to reflect the Apprentice was funded for half of the programme



Change of Employer

Apprentices can and will change employers. There are risks associated with this:

- **P60** If an apprentice starts a new apprenticeship, time on any previous apprenticeship does not apply in meeting the minimum duration requirements.

Exceptions only apply to redundancy, change in pathway, transfer of main provider but stays on same standard/framework or returns to same Apprenticeship after a break in learning

- **P74** An apprentice's eligibility for funding will not change during the apprenticeship, unless their employment status also changes.
- **P75** You must reassess an individual for any new apprenticeship.
- **P76** If an apprentice becomes unemployed or self-employed they will at that point no longer be eligible for funding and you must report them as having withdrawn from the apprenticeship on the ILR.

If an Apprentice has any period of unemployment between employers then they are considered to have withdrawn and the Apprentice must be treated as a new start with a price reduction to reflect prior learning.

RESTART INDICATOR MUST NOT BE USED IN THESE CIRCUMSTANCES

Biggest implication is for minimum duration and 20% off the job – the Apprentice must meet the requirements of both to be eligible for funding



Subcontracting – written agreement

Written agreement requirements:

- If you and an employer agree the use of delivery subcontractors, you must have an up-to-date written agreement in place with each employer that sets out the following for the delivery of their apprenticeship programme:
 - The apprenticeship training and/or on-programme assessment that you will directly deliver.
 - The amount of funding you will retain for your direct delivery.
 - The apprenticeship training and/or on-programme assessment that each delivery subcontractor will contribute to the employer's apprenticeship programme.
 - The amount of funding you will pay each delivery subcontractor for their contribution.



Subcontracting – written agreement

- The amount of funding you will retain to manage and monitor each delivery subcontractor.
- The support you will provide each delivery subcontractor in exchange for the amount of funding you will retain.
- The monitoring you will undertake to ensure the quality of the apprentice training and/or on-programme assessment you have contracted your delivery subcontractors to carry out.
- Any actual or perceived conflict of interest between you and any delivery subcontractors. For example, where you and a delivery subcontractor are part of the same group, share common directors or senior personnel, or where you will benefit financially from using a particular delivery subcontractor.

We've regularly found these requirements have not been included in written agreements with employers.

Advice from ESFA is also to have subcontractor sign the commitment statement if they are a 'significant delivery partner'



Non-Compliance and Recovery

As time has progressed the ESFA have clarified what are funding errors and when recovery would take place

- Ineligible Apprentice – All funds recovered
- Apprenticeship Agreement missing or incomplete – All funds recovered. If it's signed in response to a query all funds up to the date it's signed are ineligible
- Change of employer and not meeting minimum duration – All funds on second record recovered
- Completed Apprentices where 20% off the job not completed or insufficient evidence – All funds recovered
- Recovery is programme level – not just year we review



Provider Data Self Assessment Toolkit (PDSAT)

Report ID	Report Name	Record Count
<input type="checkbox"/> 20B-001	Report logic by report	87
<input type="checkbox"/> 20B-002	Possible duplicate learners	40
<input type="checkbox"/> 20B-003	Possible duplicate or overlapping programmes and regulated learning aims	86
<input type="checkbox"/> 20B-004	Possible duplicate or overlapping non-regulated learning aims	297
<input type="checkbox"/> 20B-005	Transferring learners	113
<input type="checkbox"/> 20A-101	All adult skills funding model learners and learning aims	6,809
<input type="checkbox"/> 20A-102	All carry-in apprenticeship standards learners and learning aims	0
<input type="checkbox"/> 20A-103	All learners and learning aims within the new apprenticeship programme	2,035
<input type="checkbox"/> 20A-104	All Advanced Learner Loan and Loans Bursary Fund learners	256
<input type="checkbox"/> 20A-105	Learners enrolled on English and/or maths learning aims	3,051
<input type="checkbox"/> 20A-106	Learning support funding	0
<input type="checkbox"/> 20A-107	Learning aims by delivery postcode	1,924
<input type="checkbox"/> 20A-108	Funding by subcontractor	19
<input type="checkbox"/> 20A-201	19+ apprentices with full funding claimed	0
<input type="checkbox"/> 20A-202	19+ apprentices with enhanced or extended funding	0

<https://www.gov.uk/government/publications/ilr-data-check-that-it-meets-standards-and-quality-requirements>



PDSAT Reporting for FM36

PDSAT reports have been specifically developed to look at post May 2017 Apprenticeship starts.

Report Number	Report Title	Implication
20A-103	All learners and learning aims within the new apprenticeship programme	Listing report – use this to check whole population
20A-207	Apprentices undertaking level 1 or below in English and/or maths within an Apprenticeship	Where level 1 is being claimed there must be initial assessment evidence to support this
20A-208	Higher level apprentices undertaking English and/or maths at level 2	Lists all those on higher apprentice and enrolled on level 2 – is it required and is delivery happening?



PDSAT Reporting for FM36

Report Number	Report title	Implication
20A-213	Apprentices withdrawing from the programme soon after attracting an additional payment	If Apprentices withdraw soon after incentive payment are made, start and end dates will be confirmed to ensure the 90/365 day requirement had been met
20A-214	Recording co-investment payments	Identifies learners where co-investment is due but none is recorded on the ILR



PDSAT Reporting for FM36

Report Number	Report title	Implication
20A-210	Negotiated prices as a proportion of funding band maxima	Reviews volumes of Apprentices by negotiated price, age and level.
20A-211	Negotiated price and actual cost	Compares negotiated prices between your own apprentices and other employers
20A-212	Apprenticeship planned durations	Provides breakdown of duration for each framework and standard. Enable comparison of duration and price at high level
20A-215	Apprenticeship standards with no end point assessment	Identifies all Apprentices who have no EPAO on the ILR and are within two months of planned end date.



20A-210 Negotiated price

Total negotiated price as proportion of funding band maximum (%)	Count of learners	Count of learners (16 to 18)	Count of learners (19 and over)	Count of learners (level 2)	Count of learners (level 3)	Count of learners (level 4)	Count of learners (level 5)	Count of learners (level 6)	Count of learners (level 7+)
> 150%	1	1	0	0	1	0	0	0	0
141% to 150%	0	0	0	0	0	0	0	0	0
131% to 140%	0	0	0	0	0	0	0	0	0
121% to 130%	0	0	0	0	0	0	0	0	0
111% to 120%	0	0	0	0	0	0	0	0	0
101% to 110%	0	0	0	0	0	0	0	0	0
100%	291	231	60	0	270	18	3	0	0
90% to 99%	76	75	1	0	76	0	0	0	0
80% to 89%	8	7	1	0	7	1	0	0	0
70% to 79%	13	12	1	0	13	0	0	0	0
60% to 69%	8	6	2	0	8	0	0	0	0
50% to 59%	0	0	0	0	0	0	0	0	0
40% to 49%	7	0	7	0	7	0	0	0	0
30% to 39%	16	0	16	0	16	0	0	0	0
20% to 29%	0	0	0	0	0	0	0	0	0
10% to 19%	0	0	0	0	0	0	0	0	0
0% to 9%	0	0	0	0	0	0	0	0	0

Additional information on age and level to assist analysis



20A-211 Negotiated prices and actual cost

Apprenticeship name	Programme type	Framework code	Apprenticeship pathway	Apprenticeship standard code	Total training price (TNP1)	Count of learners (own employees)	Count of learners (other employers)
Business Administrator	25			196	£5,000.00	1	4
Customer Service	2	488	1		£2,000.00	4	5
Customer Service Practitioner	25			122	£3,520.00	2	9
Team Leader/Supervisor	25			105	£4,240.00	1	0

The point of the report is identify your own Apprentices (LDM=356), where Employer Provider rules apply, and compare the TNP1 field to other employers you're working with on the same framework or standard.

Where the TNP1 is the same as the 'price' to the Employer, why is the value the same when you can only claim 'cost' under Employer Provider rules?



20A-212 Apprenticeship planned durations

Apprenticeship name	Programme type	Framework code	Apprenticeship pathway	Apprenticeship standard code	Total negotiated price	Up to 372 days	Greater than 372 days and up to 18 months	Greater than 18 months and up to 24 months	Greater than 24 months and up to 30 months	Greater than 30 months and up to 36 months	Greater than 36 months
Beauty Therapy Massage	2	422	3		£2,500.00	4	0	0	0	0	0
Business and Administration	3	490	1		£2,000.00	2	52	12	4	0	0
Decorative Finishing and Industrial Painting	3	522	1		£6,000.00	1	0	2	17	0	0
Horticulture Supporting Teaching and Learning in Schools	3	527	1		£2,000.00	1	2	13	0	1	0
Wood Occupations	2	420	1		£2,500.00	1	2	0	0	0	0
	2	522	2		£9,000.00	1	16	0	3	0	0

Key observation from auditors will be why is the same price for differing durations?



Funding Reports

The Hub reports are pivotal for the provider so expect the auditor to ask to see them as part of any review

Found in the 'Apps Period End Reports' zip file

Report Name	Purpose	Assurance Review Use
Apps Co-funding Contributions Report	Identifies Apprentices where co-investment is required	Identifies Levy Employers where co-investment is required
Apps Monthly Payment Report	Summary of funding paid for each Apprentice for every month on programme	Provides actual funding values for Levy funded Apprentices
Apprenticeship Data Match Report	Details Levy funded Apprentices who have failed double lock and therefore are not funded.	Identifies potential under claims and controls weakness



Where next?

Based on recent events it's likely the assurance arrangements will have a 'few tweaks' to reflect current concerns:

- Timely recording of withdrawals – prior year funding errors
- Apprentices in learning beyond planned end date – clear evidence of still being supported
- Breaks in learning – correct usage of
- Any other activity that may be considered 'data gaming'
- Additional payments to employers – has the money been paid across
- New planned end date recording (already finding errors)
- Recording off the job hours in the ILR (already funding errors) – reconciles to commitment statement and Apprenticeship Agreement



QUESTIONS
AND ANSWERS?



THANK YOU FOR
YOUR TIME AND
ATTENTION

Contact me at Karl.Bentley@rsmuk.com or on 07800 617220

