



Investigation outcome report

Provider: Park Education and Training Centre

Background

In August 2024, the Education & Skills Funding Agency (ESFA) commenced an investigation into concerns relating to apprenticeship funding claimed by and paid to Park Education & Training Centre (“the provider”). The concerns involved:

- Whether apprentices employed by temporary employment agencies were completing the minimum required 20% off the job training hours (OTJ).
- Whether apprentices were in eligible employment consistent with the relevant apprenticeship funding rules.

Outcomes of the investigation

The investigation identified that the evidence required to support funding claims did not meet the standard set out in the relevant funding rules or was not held.

The following breaches of the funding rules & apprenticeship agreement were identified:

Framework	Breach	Issue
ESFA apprenticeship provider agreement v1,3,4,6,7,8	V1 P5.1.5* V3 P5.1.5 V4 P5.1.6 V6 P5.1.6 V7 P5.1.6 V8 P5.3.5	No evidence of a documented and implemented procedure for identifying and dealing with conflicts of interest, specifically between provider & employer.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P77 & P362 (2020-21) P67 & P368 (2021-22) P61 & P332.2 (2022-23) P17 (2023-24)	Evidence of eligibility checks not held/retained by the provider to support funding claims.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P24, P72 & P354.1 (2020-21) P23 & P360.1 (2021-22) P23 & P332.2 (2022-23) P17 & P28.3 (2023-24)	Evidence of initial assessments/Skills-scan not held/retained by the provider to support funding claims.

Framework	Breach	Issue
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P70 & P354.1.4 (2020-21) P59 & P366.1 (2021-22) P24.4 & P332.2 (2022-23) P28 (2023-24)	Evidence of prior learning being identified/recognised not held/retained by the provider to support funding claims.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P357 (2020-21) P363 (2021-22) P334.1 (2022-23) P58 (2023-24)	Evidence the apprentice was receiving a wage in line with the national minimum requirements not held/retained by the provider.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P27-31 & P355 (2020-21) P27 & P361 (2021-22) P29-31 & P335 (2022-23) P59-61 (2023-24)	Apprenticeship agreements not held/retained or incomplete by the provider to support funding claims.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P56 & P359.2 (2020-21) P49 & P365.2 (2021-22) P48 & P339.3 (2022-23) P77 (2023-24)	Planned OTJ hours not documented in apprenticeship agreements and/or commitment statements/training plans by the provider to support funding claims.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P64 & P359.3 (2020-21) P52 & P365.3 (2021-22) P53 & P339.4 (2022-23) P83 (2023-24)	Evidence of OTJ delivery not held/retained by the provider to support funding claims.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P73-75 & P361.1 (2020-21) P64-66 & P367 (2021-22) P56-58 & P340 (2022-23) P86-87 (2023-24)	Commitment statements/training plans not held/retained by the provider to support funding claims or were incomplete.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P361.2 (2020-21) P367.3 (2021-22) P59-60 & P341 (2022-2023) P88-89 (2023-24)	Evidence of progress reviews not held/retained by the provider.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P349-350 (2020-21) P355-356 (2021-22) P328 (2022-23) P266 (2023-24)	The provider was unable to produce evidence packs to support funding claims to support funding claims.
Apprenticeship funding rules 2020-21 , 2021-22 , 2022-23 & 2023-24	P367 (2020-21) P382-383 (2021-22) P358-359 (2022-23)	Electronic signatures were not supported by evidence

Framework	Breach	Issue
	P268-269 (2023-24)	to show they were non-refutable.

*Please note all citations refer to the relevant paragraph number

Action

Corrective action has been taken by the provider including:

- The DfE identified an overpayment of funding of £1,203,085.89 which had been claimed across four academic years. The overpayment is being recovered by the department.
- The provider has reviewed and implemented changes to its procedures. This includes additional checks of employers, increased compliance checks and greater scrutiny of enrolment documents.

Prevention

Upon the conclusion of the investigation, the DfE undertook a prevention analysis exercise to establish what could have been done to prevent the breaches that were identified in the investigation.

Issue	Prevention
No evidence of a documented and implemented procedure for identifying and dealing with conflicts of interest.	Providers should have a system in place to help identify and respond to conflicts of interest, as well as recording these checks.
Evidence of eligibility checks not held/retained.	Providers should have systems in place to check and retain evidence of checking learner eligibility for funding.
Evidence of initial assessments/Skills-scan not held/retained.	Providers should establish an internal audit or quality assurance process to ensure that skills scans are consistently completed and documented for each apprentice. Providers must understand the role of skills scans in assessing an apprentice's baseline knowledge and tailoring the training programme accordingly. A completed skills scan should be retained in the evidence pack as part of the apprentice's enrolment documentation.

Issue	Prevention
Evidence of prior learning being identified/recognised not held/retained.	<p>Providers should ensure that robust processes are in place to assess an apprentice's prior learning at the outset of the programme.</p> <p>Providers must be fully aware of the Apprenticeship Funding Rules regarding the identification and recognition of prior learning, including its impact on programme duration and funding eligibility.</p> <p>Clear evidence of prior learning assessments should be retained in the evidence pack, demonstrating how the findings have informed the individualised training plan.</p>
Evidence the apprentice is receiving a wage in line with the apprentice national minimum requirements not held/retained.	<p>Providers should implement internal checks to ensure that apprentices are being paid at or above the applicable National Minimum Wage rate:</p> <p>20/21 - £4.15 21/22 - £4.30 22/23 - £4.81 23/24 - £5.28</p> <p>Providers must retain documentary evidence in the evidence pack to demonstrate compliance.</p> <p>Providers should remain up to date with changes to apprentice National Minimum Wage legislation and ensure this is reflected in their processes.</p>
Apprenticeship agreements not held/retained or incomplete.	<p>Providers should establish an internal audit or quality assurance process to detect any missing or incorrect apprenticeship agreements.</p> <p>It is essential for providers to understand and comply with the Apprenticeship Funding Rules concerning apprenticeship agreements.</p>

Issue	Prevention
Planned OTJ hours not documented in apprenticeship agreements and/or commitment statements/training plans.	<p>A fully completed and signed apprenticeship agreement must be retained in the evidence pack by the provider.</p> <p>Providers should ensure that the planned number of OTJ training hours is clearly documented in both the apprenticeship agreement and the commitment statement at the start of the programme.</p> <p>Providers must be familiar with the apprenticeship funding rules that require the inclusion of planned OTJ hours to demonstrate compliance and support funding claims.</p> <p>Internal quality assurance processes should include checks to confirm that OTJ hours are accurately recorded and align with the apprentice's learning plan.</p>
Evidence of OTJ delivery not held/retained.	<p>Providers should implement an internal audit or quality assurance process to identify any issues related to the delivery and recording of off-the-job training activities.</p> <p>Providers are encouraged to carry out monthly data reviews to ensure that apprentices are progressing appropriately toward meeting their off-the-job training requirements.</p>
Commitment statements/training plans not held/retained or incomplete.	<p>Providers should implement an internal audit or quality assurance function to identify missing or incorrect commitment statements or training plans.</p> <p>Providers must understand and comply with the apprenticeship funding rules regarding commitment statements and training plans.</p> <p>A current, signed commitment statement or training plan should always be retained in the evidence pack.</p>

Issue	Prevention
Progress reviews not held/retained.	<p>Providers should implement an internal audit or quality assurance process to identify any missing or incorrect documentation related to progress reviews.</p> <p>Providers must be familiar with the apprenticeship funding rules that outline the requirements for recording progress reviews.</p> <p>Evidence packs maintained by providers should include clear documentation of progress review</p>
Unable to produce evidence packs to support funding claims.	<p>Providers should conduct monthly internal audit / quality assurance reviews of their evidence that will help highlight any gaps in apprentices' evidence pack.</p>
Electronic signatures were not supported by evidence to show they were non-refutable.	<p>Providers should ensure that any use of electronic signatures is supported by secure systems that can verify the identity of the signatory and provide an audit trail.</p> <p>Providers should review their digital signature processes to ensure they meet the standards required for audit and compliance with Apprenticeship Funding Rules.</p>

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