



DfE Investigation Outcome report

Provider: Pathway First Ltd

Background

In July 2024, the Education & Skills Funding Agency (ESFA) commenced an investigation following a concern relating to Adult Education Budget (AEB) funding claimed and paid to Pathway First Limited. The concern followed a complaint that Pathway First Limited had claimed funding for a learner who was already undertaking the same ESFA funded programme with another training provider.

Following analysis of Individualised Learner Record (ILR) data, ESFA began its investigation to establish whether Pathway First Limited held evidence showing learners had been properly enrolled on to ESFA funded courses and held evidence of training being delivered by Pathway First Limited.

The Education and Skills Funding Agency became part of the Department for Education in April 2025.

Outcomes of the investigation

The investigation found that:

- There were two instances of non-compliance with the AEB funding rules 2023/24 where two learners were enrolled onto a funded learning aim without their knowledge. The same two learners were also issued with a Maths entry level 3 certificate without undertaking any learning.
- The enrolment practice for the same two learners did not comply with the AEB funding rules 2023/24.
- The provider did not hold sufficient evidence to support the funding claimed for 30 learners.

The following breaches of the AEB Funding Rules 2023/24 were identified:

Framework	Breach	Issue
<u>Adult Education Budget Funding Rules 2023/24</u>	Section 1 – General funding requirements Individualised Learner Record (ILR)	The ILR did not accurately reflect the learning and support identified, planned and delivered to eligible learners. Inaccurate information was reported which resulted in an overstatement of the funding claimed.
<u>Adult Education Budget Funding Rules 2023/24</u>	Section 1 – General funding requirements Confirmation and signatures	Enrolment documents were not completed by the learner
<u>Adult Education Budget Funding Rules 2023/24</u>	Section – 2 – ESFA funded AEB English and maths for those aged 19 or older	A thorough initial assessment was carried out to determine an individual's current assessment tools based on the national literacy and numeracy standards and core curriculums, or DfE published English and Maths Functional Skills subject content. An appropriate diagnostic assessment was not carried out to inform and structure a learner's evidence pack to use as a basis for a programme of study.

Action

Corrective action has been taken by the provider:

- The ESFA identified an overpayment of £54,133.02 funding which has

been recovered from Pathway First Limited.

- Pathway First Limited informed the ESFA it has implemented several activities to improve compliance. This has included improving internal processes and procedures in areas such as compliant enrolment, learner attendance and absence management review. Staff training has also been identified as a measure to support improvement.

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
The ILR did not accurately reflect the learning and support identified, planned and delivered to eligible learners. Inaccurate information was reported which resulted in an overpayment of the funding claimed.	Providers independent of the tutor/assessor, should quality assure learning attendance records with the learners.
The evidence in evidence packs did not assure the ESFA the learners existed. Evidence packs did not contain evidence to support the funding claimed and was therefore not available to the ESFA. Evidence packs did not evidence that learning was taking or had taken place therefore records were not available to the ESFA.	Providers independent of the tutor/assessor, should quality assure learning attendance records with the learners. Providers should have a robust quality assurance practice in place, to check that learners have completed learning before they request the issuing of certificate from the authorising body.
There was no evidence to demonstrate that learners confirmed information they provided was correct when it was collected.	Providers should have an assurance process to check the accuracy of the enrolment documents of the learner.

Issue	Prevention
<p>A thorough initial assessment was not carried out to determine an individual's current level using current assessment tools based on the national literacy and numeracy standards and core curriculums or DfE published English and Maths Functional Skills subject content. An appropriate diagnostic assessment was not carried out to inform and structure a learners evidence pack to use as a basis for a programme of study.</p>	<p>Providers should have an assurance process to check the accuracy of the enrolment documents of the learner.</p>

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