



BCT Funding Compliance Scrutiny Function Policy

Purpose of funding compliance scrutiny function

To provide guidance and checks in relation to any funding data / claim submissions to DfE / ESFA. The function acts as an additional layer of assurance to protect BCT against incorrect funding data / claim submissions that could result in a significant DfE / ESFA funding clawback.

Role of function is to:

- provide oversight of funding claims and ILR data submissions
- ensure that funding claims / ILR data submissions follow funding rules and submission requirements and guidance.
- ensure that funding claims / ILR data submissions are complete, accurate and consistent with actual learning activity, including through use of the PDSAT tool, exception reports, and validation checks.
- recommend any improvements / amendments to the processes, used for submitting funding claims / ILR data, to the senior management of BCT

Function process and procedures

Provide oversight of funding claims and ILR data submissions

- Contract manager models expected learner numbers and financial projections at the start of contract year
- MIS team send numbers and financial projections back to contract managers based on actual ILR data two weeks before R04 (SP) and then at least 4 working days in advance of a future return deadline
 - Pre R04 SP meeting held with SMT / Directors - Eligible clean starts vs planned
 - Discrepancies checked and fixed and numbers confirmed
- Regular meeting between contract managers and MIS manager held with numbers/submissions/guidance as key agenda point
 - Skills and Employment SMT meeting (apprenticeship & AEB) - twice monthly
 - MIS Study programme (every two weeks)
- Regular meeting between contract manager and directors held with numbers/finance/submissions key agenda point
 - Apprenticeship - finance and performance (every 4 weeks)
 - SP - finance and performance (monthly)
 - AEB - progress meeting (every two weeks)
- Monthly all contract performance and finance meetings held between Directors
- MIS perform twice yearly internal audit and present results to directors / SMT and separately to advisory board finance risk committee - including official start figures, error rate
- External annual audit prior to final return (every 2 years)



Ensure that funding claims/ILR data submissions follow funding rules and submission requirements and guidance

- All ESFA/DfE guidance relevant to specific contract are to be read prior to contract year by MIS manager and the respective contract manager
- MIS manager and contract manager sign the [procedure tracker](#) to confirm
- External training via reputable organisations such as AELP to disseminate guidance are to be undertaken by relevant staff attend and participation details recorded by HR
- MIS in conjunction with enrolment team create enrolment paperwork based on the guidance prior to contract year and present to directors for approval
- ESFA updates to be subscribed to and read monthly by MIS manager and contract managers
- MIS manager subscribe to ESFA community forums and check at least monthly
- MIS manager confirm submission prior to each official return window

Ensure that funding claims/ILR data submissions are complete, accurate and consistent with actual learning activity, including through use of the PDSAT tool, exception reports, and validation checks

- Course timetables created to capture planned learning activity
- Timetables used as basis for ILRs and cross checked against each other prior to programme start and again in year by MIS manager and contract manager
- PDSAT reports to be used monthly including '24B-001' to explain the reason for learners showing in the report and what actions need to be taken to meet the requirements.
- FRM reports used each month to provide different complementary information
- MIS/contract manager in month meetings used to cross check/update expected vs actual numbers

Recommend any improvements/amendments to the processes, used for submitting funding claims/ILR data, to the senior management of BCT

- Twice monthly line management, monthly SMT meetings take place allowing for feedback re internal processes that create ILR's
- Annual enrolment review and enrolment planning allow for further recommendations to be discussed/delivered

| Date Updated | To Review | Responsibility |
|--------------|-----------|----------------|
| July 2025 | Jul 2027 | IM |