

Ginger Nut Training.



Document Title

Error and Rectification Policy

Originator

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Responsible Person

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Purpose

The Post-16 education, training and skills sector is a very complex environment which is regulated through rules and guidance published by the DfE/ESFA, Ofsted, Awarding Organisations and others. As an organisation we have a duty to comply with relevant rules and guidance and to put in place robust systems to ensure compliance. From time to time, errors will be made and our systems need to be sufficiently robust to identify errors to allow for prompt rectification. It is important to recognise that errors could be made by staff, associates, learners, subcontractors, suppliers, contractors and other organisations.

Scope

All staff and associates have a responsibility for addressing/ reporting errors when they are identified. Senior Managers have a responsibility to put in place policies, procedures and training to:

- Prevent errors being made
- Identify errors when they are made
- Rectify errors, where rectification is possible

All staff are encouraged to promote a 'right first time' culture, address minor errors promptly and effectively and alert managers where more significant errors have been identified.

Most Errors identified will be low level, will be discussed with line manager and corrected – most errors will be resolved with little drama. However, some errors have more significant consequences and errors are expected to be reported:

- If the error has a potential financial consequence (positive or negative) over £10,000
- If the time needed to correct the error (opportunity cost) is estimated to be over 10 hours
- If the error requires discussion with third parties (employers, learners, EPAO, ESFA etc)

Examples of Errors

Minor Errors (*need correcting but do not need to be reported*)

- A learner's Planned End Date on the MIS system has been entered incorrectly (but this error was made in the last few days and the error hasn't been recorded on an ILR returned to the ESFA)
- A learner was wrongly marked as present for a recent online class. This is not something that happens regularly.
- A supplier has omitted to deliver the pens in a stationery order but has promised to ship them to us in the next few days.

Significant Errors (*need reporting and corrective action agreed with manager*)

- Funding claimed for a learner who we have now identified as being ineligible to participate in the programme/ course
- Certificates claimed from the awarding body when the course has not been completed by the learner
- Incentive payments received from the DfE/ESFA but not passed on to the employer.

Significant errors should be reported to the Fraud Prevention Lead who will record the nature of the error and the agreed actions in an error log. The error log will be regularly reviewed to help us to improve our procedures.

Risk Identification and Training

As part of our responsibility for minimising the number of errors which happen and the impact those errors have on the organisation we regularly review:

- Where errors are most likely to occur
- The potential consequences of errors occurring
- The training which needs to be in place to prevent the occurrence of errors

The outcomes will be recorded on our risk register and training to mitigate the risk of errors put in place. Staff are also encouraged to identify their own training needs through the appraisal process and in discussions with line managers.

An area where scrutiny will be prioritised, relates to:

- DfE/ESFA ILR Funding Claims
- Claims made to other funders

The Funding Claim training must extend beyond the data processing team as errors can occur for many reasons including:

- Inaccurate learner eligibility assessments
- Inaccurate adjustments for Prior Learning and Experience
- Inaccurate recording of Off-the-Job Hours for apprentices
- Inaccurate attendance registers
- Deficiencies in the Progress Review process
- Lack of evidence to support learning support claims
- Lack of evidence to support Functional Skills claims

Key risk and risk mitigation strategies will be reviewed regularly, and all staff are encouraged to share their thoughts on vulnerability and process improvement.

Monitoring, Review and Evaluation

This policy/procedure will be reviewed every 12-months or in response to changes to legislation or best practice, whichever is the sooner. The Fraud Prevent Lead is responsible for monitoring and reviewing this policy reporting to the Audit and Risk Committee.

ERROR RESPONSE PLAN

Purpose

This response plan provides a documented framework for the Fraud Prevention Lead (and if necessary other managers) to follow if significant errors are identified.

The response plan is there to ensure that:

- The error is properly investigated
- The corrective actions are agreed, documented and implemented
- We learn from and respond to any errors made through improvements to our systems

Reporting an error

All staff are under a duty to report significant errors to the Fraud Prevention Lead. The report should be made without delay. If there is any doubt in the mind of the reporter whether the error is 'minor' or 'significant' it should be shared with the Fraud Prevention Lead who will determine the status of the error.

If the Fraud Prevention Lead is implicated in the error, then the report should be made directly to one of the Directors or to the Audit & Risk Committee who shall in turn appoint an Investigating Officer.

When error reports are made, all details should be provided and will be recorded accurately and in a timely manner. The decision by someone to report an error is welcomed and the individual will be supported appropriately.

The Fraud Prevention Lead will be responsible for liaising with Directors and the Audit & Risk Committee if the error could be material to the performance of the organisation.

The Fraud Prevention Lead must also consider whether the error is sufficiently serious to report to DfE/ESFA or other funding body or awarding organisation.

Initial enquiry

On receiving details of a suspected error, the Fraud Prevention Lead will undertake an initial review and decide if any further action will be required, liaising in a timely manner with the Directors and the Audit & Risk Management Committee.

The further action may include referral to the DfE/ESFA, other funder, awarding body or other third-party agency. In rare circumstances what may be reported as an error may need investigation as a potential fraud.



Conducting an Investigation

The Fraud Prevention Lead should decide the remit and scope of any investigation and also determine the investigation timescales, reporting arrangements and deadlines. The purpose of the investigation is to identify:

- Is the reported error a real error
- What are the implications of the error (including financial implications)
- What (if anything) can be done to rectify the error
- A plan for error rectification (including timescales and responsibilities of individuals)

A report (which will often be a brief report) must be produced which documents the outcomes of the investigation.

Concluding an error investigation

At the end of the investigation, irrespective of the outcome, the Fraud Prevention Lead should review the position and see what lessons can be learned. Such reviews will help identify any weaknesses in controls that initially led to the error and should highlight any deficiencies that should be addressed.