

Four weeks to prove what it delivered

A funding assurance review lands on a provider that believes it is fine. Four weeks to find out whether the record can prove what the learners achieved, without creating a single file after the event.

An illustration. The provider, its figures and its people are invented, to show the method in use: a wrong turn, a dilemma the method did not settle, and what it cost.

THE ORGANISATION

FORM	A company limited by guarantee
INCOME	About £4 million
DELIVERY	Apprenticeships and adult skills from four centres in the north of England
SUBCONTRACTING	A third of its learners taught by two subcontractors
STANDING	A good last inspection; learners achieve, employers renew
SITUATION	A realignment under a deadline. The risk is disbelief, not panic.

THE SHAPE OF THE OUTCOME

- The sample comes back **satisfactory, under the five-per-cent line**, with findings on off-the-job evidence at the subcontractor; the specific errors are recovered by offset
- A complete learner file in **minutes** for directly taught learners, and **within the day** for subcontracted ones
- The rerun comprehension check passes **nine in ten**

FIELDWORK

4 weeks

from the notice, third week of September 2026

SELF-TEST

approx. 8%

projected error rate on the subcontracted trade

THE LINE

5%

the error rate the review turns on

MID-PROGRAMME

40

apprentices at the subcontractor

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SOURCE

Nobody Else Is Coming, first edition (October 2026), chapter 11, pp. 43–44

REFERENCE

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1 · THE NOTICE

“Presumably this is fine”

The notice arrives in the third week of September 2026: a funding assurance review, fieldwork in four weeks, the sample to follow a week or two before it. The managing director forwards it to the new compliance manager, three weeks into the job.

The provider is succeeding by its own measures. Learners achieve, employers renew, the inspector was kind, and the board believes the review is a formality. The five opening questions find a clock, a decision-maker, a scattered record and a definition of done that reaches past the review itself.

THE CLOCK

4 weeks

to fieldwork; the last learner-data return for the year shortly after

THE DECISION-MAKER

The MD

and a board of five, two of them the founders

ACCESS

3 systems

that do not talk to each other, two subcontractors' filing cabinets, and a great many inboxes

KIND OF SITUATION

Realignment

under a deadline; the risk is disbelief, not panic

Definition of done

- A satisfactory result on the sample
- No file created after the event
- The subcontractors' evidence brought inside the provider's own record
- A system that would pass the same review next year without a four-week sprint

△ FOUND IN WEEK ONE

One subcontractor's files for apprentices in one trade have **off-the-job training records that do not reconcile** to the hours claimed.

The same subcontractor has **no data-processing agreement** with the provider at all, although it holds the learners' personal data on the provider's behalf.

The first week: the self-test

The operator does not wait for the sample. Using the department's published list of common findings as a checklist, the team tests every learner who started in the last funding year on the five fields the findings name most often (overleaf). Two things surface in the first week.

2 · DIAGNOSIS

The record is the constraint

THE DECISIVE CONSTRAINT

The provider cannot produce a complete learner file in less than a day, and no one owns the subcontractors' evidence.

The five fields the self-test checked, from the department's published list of common findings

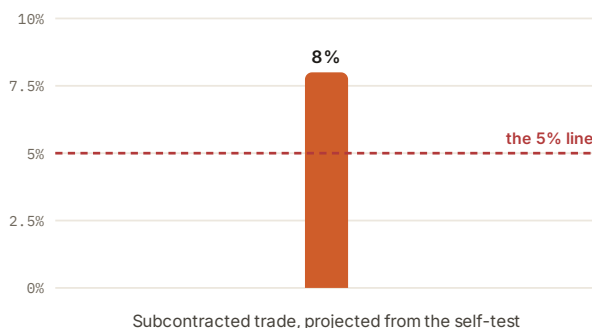
FIELD 1	FIELD 2	FIELD 3	FIELD 4	FIELD 5
Start dates, with evidence of learning	Breaks in learning	Planned hours	Eligibility and prior attainment	Learning support, with monthly evidence of the adjustments made

The three risks

- 1 **The off-the-job shortfall** pushing the error rate over the five-per-cent line.
- 2 **The missing processing agreement:** personal data held on the provider's behalf with nothing governing it.
- 3 **Staff who, under pressure, might complete files after the event,** which would turn a funding error into something much worse.

The arithmetic that persuaded the managing director

The managing director regards compliance as the department of no. He is persuaded by arithmetic, not argument: the self-test projects an error rate of around eight per cent on the subcontracted trade, and an unsatisfactory result would cost more in recovered funding and self-audit than the subcontract earns in a year.



Error rate on the subcontracted trade, projected from the week-one self-test, against the five-per-cent line the review turns on. The review's sample later came back under the line. Figures invented.

A COMPLETE LEARNER
FILE

A day or more
to produce, before the
sprint

OWNER OF THE
SUBCONTRACTORS'
EVIDENCE

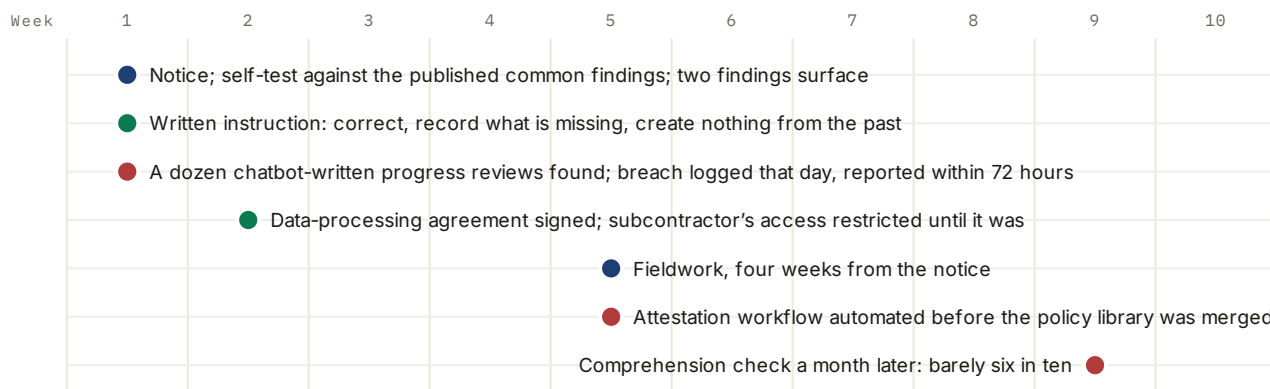
None
before the sprint

⚠️ WHY DISBELIEF IS THE RISK

A provider that is succeeding by its own measures does not expect its record to fail. The review does not retest the teaching; it asks whether the evidence of it can be produced, field by field, on the day.

3 · STABILISE, THEN BUILD

Nothing created after the event



Dated events in the case, from the week the notice arrived. The library merge and the rerun attestations followed the comprehension check; the obligations pipeline was run by hand for six weeks after the review and then automated.

Stabilise: before the sample

- The first instruction to the whole team, in writing, is the one that matters most: **correct the learner data where the data is wrong, record what is missing, and create nothing that pretends to be from the past.**
- The **evidence pack** is defined for every funding stream and indexed.
- Errors that can properly be corrected in the learner data before the hard close are corrected, **each one logged and approved.**
- The **processing agreement** is signed in week two, and the subcontractor's access to the provider's systems is restricted until it is.

Build: after the review, not before

- **Validation at the point of entry.**
- A **weekly exception report.**
- A **quarterly file sample** of each subcontractor.
- The **obligations pipeline**, run by hand for six weeks and then automated, with the operator as the named decision-maker.
- An **AI rule**: a review is the tutor's own account of what the learner did, signed by the tutor, and drafted in an approved tool if drafted in one at all.

✓ WHAT WOULD MAKE NEXT YEAR'S REVIEW ORDINARY

Validation where the data is entered, an exception report that runs every week, and a sample of the subcontractors' files every quarter, so that the sprint would not be needed again.

THE INSTRUCTION THAT MATTERED MOST, IN WRITING, TO THE WHOLE TEAM

Correct the learner data where the data is wrong, record what is missing, and create nothing that pretends to be from the past.

4 · THE AI EPISODE, AND THE WRONG TURN

Clicking is not understanding

FOUND IN THE SELF-TEST

A dozen progress reviews, written by a busy tutor with a public chatbot, that read beautifully, contain the learners' names and employers, and describe progress the learners' own records do not show.

Because the tool's terms let it keep and use what was typed into it, the episode was logged that day as a **personal-data breach** and reported to the regulator **within seventy-two hours** of being found. The reviews were withdrawn and redone with the learners; the tutor was retrained, not dismissed.

The AI rule, as adopted

A review is the tutor's own account of what the learner did, signed by the tutor, and drafted in an approved tool if drafted in one at all.

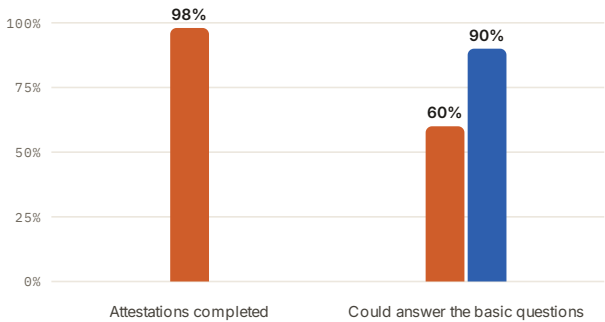
WHAT WENT WRONG

The operator automated the policy-attestation workflow in week five, before the policy library had been merged. Staff received **forty-one attestation requests in a fortnight**. Completion reached ninety-eight per cent; the comprehension check a month later found that barely six in ten could answer the basic questions on the safeguarding policy they had attested.

The attestation rate had measured clicking. The library was merged into nine policies, the attestations were rerun, and the operator added a line about fixing the process before automating it to her own notes: a rule she had, after all, been taught.

Before the library was merged

After the merge and rerun



Completion against comprehension on the safeguarding policy: ninety-eight per cent completed; barely six in ten could answer the basic questions a month later; nine in ten after the rerun. Figures invented to show the shape of the finding.

ATTESTATION REQUESTS

41

in a fortnight, in week five

POLICIES AFTER THE MERGE

9

from a library that had never been merged

The breach, step by step

IN THE FIRST WEEK

A dozen reviews found in the self-test, written with a public chatbot

THE SAME DAY

Logged as a personal-data breach: the tool's terms let it keep and use what was typed in

WITHIN 72 HOURS

Reported to the regulator

THEN

Reviews withdrawn and redone with the learners

THE TUTOR

Retrained, not dismissed; the AI rule adopted

5 · THE DILEMMA, THE OUTCOME, AND WHAT TO TAKE FROM IT

Whether to end the subcontract

THE DILEMMA THE METHOD DID NOT SETTLE

The evidence at the subcontractor was weak and the board's instinct was to terminate. But **forty apprentices were mid-programme** with employers who had chosen that subcontractor for its trade expertise, and ending it would have harmed the learners for a failing that was the provider's as much as the subcontractor's.

The board chose a **remediation plan with a deadline**, a full file check at six months and termination as the stated consequence of missing it, and recorded the minority view that it should have ended there and then. The method made the choice visible and the reasons durable. It could not make the choice.

The shape of the outcome

- The sample comes back satisfactory, under the five-per-cent line, with findings on off-the-job evidence at the subcontractor; the specific errors are recovered by offset.
- Complete files can be produced in minutes for directly taught learners and within the day for subcontracted ones.
- The rerun comprehension check passes nine in ten.

These figures are invented to show the shape of an outcome, not to describe one.

Copy

- The self-test against the published findings, before the sample arrives
- The written instruction that nothing is created after the event
- Processing agreements before data moves
- The AI rule
- Measuring comprehension as well as completion

Do not copy

- The tools, the thresholds or the timetable
- Waiting for a review notice to find out whether you could pass one

Read the full case in the playbook

This brief follows the worked case at the end of chapter 11, "Compliance architecture", of *Nobody Else Is Coming: An Operator's Playbook for Crisis, Compliance and Capital* (first edition, October 2026), pp. 43–44. The chapter sets out the operating model the case applies: culture, the obligations pipeline, AI behind a human gate, funding assurance, data protection after the 2025 Act, safeguarding and speak-up.

[Open chapter 11 at the case >](#)

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