Audit & Risk Committee - Action and Decision Log
Meeting No 42 – 30 November 2023

Meeting Date	Agenda Item	Reference	Details	Action Owner	Due Date	Action Decision	Open Complete Approved Declined
06/06/2023	Internal Audit Report 2022-23 – Fraud Awareness	ARC40: A01	J Thomson to extract the Fraud, Theft and Bribery section of the Financial Regulations to a separate document, inclusive of date and version number, which will be accessible to staff.	~~J Thomson~~ A Ritchie	~~07/06/2023~~ 30/11/23	Action	Complete – Paper 9 on Nov Agenda proposes Draft Policy document for review and comment
10/10/23	2023 – 24 Committee TOR and Workplan	ARC41: D01	The Committee approved the updated TOR and current Workplan for submission to the Board.	NA	NA	Decision	Approved
10/10/23	Budgeting & Monitoring Report 2023-24 *(Paper 3d)*	ARC41: A01	It was highlighted that as this Budgeting & Monitoring Report contains financial information that cannot be published until Feb 2024, it would be held as a reserved item.	H Denholm	Feb 2024	Action	Complete
10/10/23	Internal Audit Rolling Action Plan as at September 2023	ARC41: A02	The Committee agreed to the update being assigned to Alan Ritchie.	A Ritchie	30/11/23	Action	Complete
10/10/23	Safeguarding and the recording of data of protected characteristics.	ARC41: A03	This will be checked with Doreen Wales, Assistant Principal for Student Experience & Quality Enhancement.	A Campbell	30/11/23	Action	Complete – the Safeguarding form contains a number of questions including those on protected characteristics
10/10/23	2023-24 Corporate Risk Register (V1) as at September 2023	ARC41: D02	The Committee recommended 2022-23 Corporate Risk Register (V1) as at September 2023 to the Board for approval.	NA	NA	Decision	Approved

Ayrshire College

Credits Audit 2022/23
September 2023

The matters raised in this report came to our attention during the course of our audit and are not necessarily a comprehensive statement of all weaknesses that exist or all improvements that might be made.

This report has been prepared solely for Ayrshire College's individual use and should not be quoted in whole or in part without prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any third party.

We emphasise that the responsibility for a sound system of internal control rests with management and work performed by internal audit should not be relied upon to identify all system weaknesses that may exist. Neither should internal audit be relied upon to identify all circumstances of fraud or irregularity should there be any although our audit procedures are designed so that any material irregularity has a reasonable probability of discovery. Every sound system of control may not be proof against collusive fraud. Internal audit procedures are designed to focus on areas that are considered to be of greatest risk and significance.

Introduction

A review of the College's student data returns has been carried out in accordance with the "Credit Guidance for Colleges AY 2022-23" issued by the Scottish Funding Council (SFC) on 31 May 2022 and the "FES Return and Audit Guidance 2022/23" issued 30 August 2023.

The audit certificate, along with the College certificate, was submitted to the Scottish Funding Council on 6 October 2023. This report was submitted to the SFC on 6 October 2023.

Scope of Review

The audit procedures have been designed to ensure the College has adhered to the "Credit Guidance for Colleges AY 2022/23". As planned, the audit took 5 days to complete comprising fieldwork carried out by the Audit Senior and a review by both the Director and the Partner. All staff involved in the audit had relevant experience.

Our audit sample was selected using analytical techniques and covered a minimum of 5% of the total Credits count with a minimum of 10 courses being tested. Additional sample checks were also carried out on Credits relating to Open/Distance Learning, Infill, Credits spanning academic years, Work Based Learning, Fee Waiver, and non-fundable courses.

The audit process of reviewing the returns being submitted was carried out using the following processes:
- ➢ A review of the systems operated by the College for the return;
- ➢ Appropriate walk through and compliance checks for the relevant areas;
- ➢ Analytical review techniques to ensure testing was undertaken in the most appropriate areas;
- ➢ Sample checking the data included in the return; and
- ➢ Specifically tailored Credits audit programmes.

Summary of Recommendations

Current Year recommendations

Grading of Recommendations- Appendix C	High	Medium	Low	Total
Credits	-	-	1	1

As can be seen from the above table there were no recommendations made which we have given a grading of high.

Conclusion

The audit certificate in respect of the 2022/23 return included within Appendix A, is unqualified and is in the format set out in the SFC audit guidance. The audit certificate was submitted to SFC on 29 September 2023.

Overall Conclusion
The College has reasonable procedures and controls over the collection of data for the credits return and assurance can be taken that the credits count for the College is not materially mis-stated. The systems used by the College are satisfactory. The recommendations arising as a result of our review are included within Appendix C. We can confirm that there was no recommendations from previous years. The College credit target for the academic year 2022/23, agreed between the SFC and the College, was 123,867 with an actual claim of 122,552. A summary of the variances is included in the table below.

	Target	Claimed	Variance
Core Credits	122,523	120,730	(1,793)
FA Credits	1,344	1,822	478
Total	123,867	122,552	(1,315)

We include for your reference comparative benchmarking data of the number and ranking of recommendations made for audits of a similar nature in the year ending 31 July 2022.

Credits Audit 2022/23

Benchmarking	High	Medium	Low	Total
Average number of recommendations in similar audits	-	-	2	2
Number of recommendations at Ayrshire College	-	-	1	1

As can be seen from the above table, the College has a lower number of recommendations in comparison to the colleges it has been benchmarked against.

Non-Fundable Activity

We reviewed, in full, with the College to confirm that all activity which has been classified as fundable has been correctly classified. We reviewed non-fundable activity to ensure that this is complete. ***From our review we found that all courses were accurately treated as either fundable or non-fundable by the College.***

Spanning Programmes

We reviewed in full all courses which spanned the academic year to ensure the College had deferred until next year all credits for courses spanning 2021/22 to 2022/23. ***Our testing concluded that credits have been claimed in the correct period.***

Non-Fundable and Fundable Students

We reviewed in full all students classified as non-fundable by the College to confirm accuracy and completeness. Testing was performed to ensure that credits values have only been allocated to fundable students. ***Our testing indicated that the College are classifying its fundable and non-fundable students correctly.***

Full-Time and Other than Full-Time Classification

A sample of 10 courses were randomly selected from the four modes of attendance (6 from higher education and further education full-time and 4 from higher education and further education other than full-time). Testing was undertaken to ensure these were correctly classified. ***We can conclude that all courses tested were correctly classified.***

Higher Education and Further Education Classification

The sample selected was the same as the above test. ***Our audit work indicated that courses had been correctly classified.***

Infill Students

The College have a separate class code beginning with an 'I' to illustrate an infill course. The word 'infill' also appears in the title of the course.

We tested a sample of 10 students treated as infilling into courses to ensure that they had been correctly classified, and that Credits had been calculated correctly. ***No issues found from our testing.***

We also reviewed in full the students the College were classifying as infill students to confirm that credits were only being claimed for the subjects the students had undertaken. ***No issues were found from our testing.***

Attendance Criteria

For our sample of 10 courses tested, we tested to ensure that the College had correctly calculated and recorded the required date. ***We can confirm that the College has calculated course required dates in line with the guidance.***

For a total of 65 students across our samples, we ensured that the College had obtained a valid enrolment form and that where credits had been claimed, the student had attended past the correct required date. ***We can confirm that each student in our sample an appropriate enrolment record was available.***

We traced a total of 391 students to attendance registers across the 10 courses that we sample tested to ensure that they had attended beyond the required date, where credits had been claimed for the student. ***We can confirm that each student in our sample was appropriately traced to the attendance register.***

We also performed testing on a sample of 15 withdrawals to ensure that these had been processed in accordance with SFC guidance. ***No issues found.***

Credits Count

For our sample of 10 courses, we recalculated the individual credits for each of these courses to confirm the correct value had been allocated by the College. We reviewed the attendance of the students on these courses to ensure that credits were only attributed to those students who had attended beyond the required date and who were fundable students. *We found that the College has correctly calculated the Credits. See Attendance Criteria above for details about our findings from our testing of students attending beyond the required date.*

Maximum Credits Claim

All students with more than one enrolment were identified and investigated to ensure credits were not overclaimed. *Our testing found that there were no overclaims. We also completed a review of related study courses and found no issues during this testing.*

Fee Waiver

A random sample of 15 fee waived students were selected. We checked to ensure that their eligibility for a fee waiver had been assessed appropriately by the College. This was done by tracing to an enrolment form and where appropriate a fee waiver form and relevant eligibility documentation. We also assessed whether the students had been allocated to the most appropriate fee waiver category. *Following our testing, we found that one of the students tested had not signed the Fee Waiver Form. Please see Appendix C for further information.*

We also performed an analytical review on the College's fee waiver claim, see section 4 for further details.

Open/Distance Learning

A random sample of 10 students from open/distance learning courses were selected and traced to an enrolment form to ensure the students had a Scottish post code and that the College were correctly claiming credits. We also traced to evidence of achievement/progression. *We can confirm that there were no issues noted from our testing.*

Work Based Learning

A random sample of 10 students from work-based learning courses were selected and traced to the students' enrolment form and evidence of achievement/progression to ensure the College were correctly claiming credits. ***We note that there has been an improvement in the provision for Work-Based Learning at the College. However, we have raised one low grade recommendation relating to our sample, which we believe relates to a unique case.***

Collaborative Provision

We confirmed with the College that no Collaborative Provision was undertaken in 2022/23.

Credits Analytical Review

We reviewed the Credits per Price Group and compared these with the previous year's Credits per Price Group figures, investigating any significant fluctuations with the College. Where there have been movements (positive or negative) these are in line with the forecasted level of delivery as per the 2022/23 curriculum plan.

Price Group	2022/23		2021/22		Variance
	Credits	% of Total	Credits	% of Total	Credits
1	18,273	15%	19,727	15%	(1,454)
2	52,971	43%	61,140	48%	(8,169)
3	46,320	38%	45,250	35%	1,070
4	943	1%	1,089	1%	(146)
5	4,045	3%	729	1%	3,316
Total	**122,552**	**100%**	**127,935**	**100%**	**(5,383)**

There has been a decrease of approximately 4.20% in the overall credit delivery. The areas of highest movement are in Price Group 2 and 5. This is as a result of:

Wylie Bisset

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➤ Price Group 2 – decrease as a result in the reduction in Full Time students;
➤ Price Group 5 – increase as a result of an increase in the number of students on a DPG18/PG 5 programme

We have also compared the average credits per student head count for 2021/22 and 2022/23 and found that there was a decrease in the overall average credits per student of 1.6 (14.7%). This is due to an increase in the level of part-time students.

Average Credits	2022/23	2021/22
Credits (excluding ELS)	122,552	127,936
Student Head Count	13,216	11,765
Ave. Credits per student	9.27	10.87

Fee Waiver Analytical Review

We also reviewed the fee waiver claimed per category of fee waiver and compared these with the previous year's figures, again investigating any significant fluctuations with the College. There were no significant variations in the level of fee waiver categories. See page 13 for details of our Fee Waiver analytical review.

Fee Waiver Category	2022/23 (£)	2021/22 (£)
Full time non advanced	2,191,392	2,591,568
Income support	4,061	1,207
Low income	310	519
Islands Authority fee waiver (excl. Orkney and Shetland)	-	-
Cost borne by college	84,614	99,689
Incapacity benefit	-	-
Severe disablement allowance	-	-
Housing benefit	227	980
Student on a DPG18/PG 5 programme	252,937	41,133
Carer's allowance	668	2,755
Disability living allowance	56	479
Pension credit	-	226
Working tax credit	1,150	1,979
Old FT criteria	20,175	631,354
School pupils	536,109	440,503
Attendance allowance	-	-
Income based job seekers allowance	917	992
Income-related employment and support allowance	5,669	4,466
Student in care	-	282
Asylum seeker or spouse or child of an asylum seeker	2,982	1,805

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Contribution based employment and support allowance	677	85
Personal Independence Payment (PIP)	7,100	8,015
Universal credit (UC)	80,271	53,925
Short full-term (SFT) course where the student is eligible for	985,947	180,589
Covid-19	-	22,929
Total – including cost borne by college	4,175,261	4,085,079
Total – excl. cost borne by college and overclaims	3,974,566	3,881,374

There has been an increase of approximately 2.4% in the fee waiver claim (excluding cost borne by the College and over claims). The most significant fluctuations in fee waiver categories relate to 'Full-Time Non-Advanced', 'Low Income, 'Special Needs (DPG 18) Students' and 'Short Full Time.

➢ Decrease in 'Full-Time Non-Advanced' - The College has seen a decrease in overall credit delivery of approximately 15% in 2022-23 which is reflected in the drop in FE / HE student numbers.

➢ Increase in 'Special Needs (DPG18) Students' – The data is reflective of the work undertaken by the College to improve the classification of courses in accordance with SFC guidance. It is also reflective of the number of courses that the College undertakes in this area.

➢ Increase in 'Short Term Full Time' – This is a result of more students undertaking Short Term FT courses as opposed to Full Time courses.

➢ Decrease in Covid - The level of post Covid-19 recovery is at 0 compared with £22,928.96 in 2021-22.

The table below details the actual dates for our fieldwork and the reporting on the audit area under review.

Audit stage	Date
Fieldwork start	11 September 2023
Closing meeting	15 September 2023
Draft report issued	28 September 2023
Receipt of management responses	5 October 2023
Final report issued	6 October 2023
Submission to the SFC	6 October 2023
Audit Committee	22 November 2023
Number of audit days	6

Wylie
Bisset

We detail below our staff who undertook the review together with the College staff we spoke to during our review.

Wylie & Bisset LLP			
Partner	Graham Gillespie	Partner	graham.gillespie@wyliebisset.com
Director	Stephen Pringle	Director of Internal Audit	stephen.pringle@wyliebisset.com
Senior	Neil Hamilton	Internal Audit Senior	neil.hamilton@wyliebisset.com

Ayrshire College			
Key Contacts:	Richard Simson	Head of Business Intelligence and Information Systems	richard.simson@ayrshire.ac.uk
Wylie & Bisset appreciates the time provided by all the individuals involved in this review and would like to thank them for their assistance and co-operation.			

APPENDICES

Auditors' Report to the members of the Board of Management of Ayrshire College

We have audited the FES return which has been prepared by Ayrshire College under the SFC's Credits Guidance for colleges issued 31 May 2022 and which has been confirmed as being free from material misstatement by the College's Principal in her Certificate dated 3 October 2023.

We conducted our audit in accordance with guidance contained in the 2022-23 audit guidance for colleges. The audit included an examination of the procedures and controls relevant to the collection and recording of student data. We evaluated the adequacy of these controls in ensuring the accuracy of data. It also included examination, on a test basis, of evidence relevant to the figures recorded in the student data returns. We obtained sufficient evidence to give us reasonable assurance that the returns are free from material misstatement.

In our opinion:
- The student data returns have been compiled in accordance with all relevant guidance;
- Adequate procedures are in place to ensure the accurate collection and recording of the data; and
- On the basis of our testing, we can provide reasonable assurance that the FES return contains no material misstatement.

Signature	Wylie & Bisset LLP
Date	6 October 2023
Name of Audit Firm	Wylie & Bisset LLP
Contact Name	Graham Gillespie
Contact telephone number	0141 566 7000.
Date FES returned	6 October 2023

Fee Waiver			
Ref	**Finding and Risk**	**Grade**	**Recommendation**
1	The College should ensure that Fee Waiver Forms are appropriately signed by the student in line with SFC guidance. During our review, our sample testing highlighted that 1 of our sample of 15 tested had not signed the Fee Waiver Form. This was due to a temporary member of staff accepting the letter unsigned. We note that the form had been stamped by the Job Centre to confirm the student's eligibility. There is the risk that this could make the claim invalid, which could result in a fee waiver being funded by the SFC in error.	**Low**	We recommend that the College ensures that Fee Waiver Forms are signed by the student before being returned to the College.

Management Response	**Responsibility and Implementation Date**
The Financial Services Team will be reminded of the importance of ensuring the student's signature is obtained on all Fee Waiver Forms.	*Responsible officer* Head of Financial Services *Implementation date* 31st October 2023

Wylie Bisset

C   GRADING STRUCTURE

For each recommendation we make we assign a grading either as High, Medium, or Low priority depending upon the degree of risk assessed as outlined below:

Grading	Classification
High	Major weakness that we consider needs to be brought to the attention of the Audit Committee and addressed by senior management of the College as a matter of urgency
Medium	Significant issue or weakness which should be addressed by the College as soon as possible
Low	Minor issue or weakness reported where management may wish to consider our recommendation

Ayrshire College

Education Maintenance Allowance
2022 - 2023

+ September 2023

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The matters raised in this report came to our attention during the course of our audit and are not necessarily a comprehensive statement of all weaknesses that exist or all improvements that might be made.

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We emphasise that the responsibility for a sound system of internal control rests with management and work performed by internal audit should not be relied upon to identify all system weaknesses that may exist. Neither should internal audit be relied upon to identify all circumstances of fraud or irregularity should there be any although our audit procedures are designed so that any material irregularity has a reasonable probability of discovery. Even sound systems of control may not be proof against collusive fraud. Internal audit procedures are designed to focus on areas that are considered to be of greatest risk and significance.

1. Executive Summary

Introduction

This report has been prepared following the conclusion of our audit of the Education Maintenance Allowance for the year ended 31 July 2023.

The audit certificate was submitted to the Scottish Funding Council (SFC) on 29 September 2023.

Summary of Recommendations

Current Year Recommendations	High	Medium	Low	Total
EMA Audit 2022/23	-	-	-	-

Prior Year Recommendations	High	Medium	Low	Total
There were no recommendations made on the EMA Audit 2021/22.				

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Conclusion

Overall Conclusion:
We have examined the books and records of Ayrshire College, including evidence of checks of five percent of applications and payments, with a sample size appropriate to the total number of applicants, and have obtained such explanations and carried out such tests as we considered necessary. On the basis of our examination and of the explanations given to us, we report that the information set out in these forms is in agreement with the underlying records. We also report that, in our opinion, the College used these funds in accordance with the Scottish Funding Council's conditions and the principles of the Education Maintenance Allowance programme. We are satisfied that the systems and controls of the administration and disbursement of these funds are adequate.

2. Benchmarking

We include for your reference comparative benchmarking data of the number and ranking of recommendations made for audits of a similar nature in the year ending 31 July 2022.

Benchmarking	High	Medium	Low	Total
Average no. recommendations in similar audits	-	-	-	-
Recommendations at Ayrshire College	-	-	-	-

As can be seen from the above table, the College has a similar number of recommendations in comparison to the colleges it has been benchmarked against.

3. Audit Arrangements

We detail below our staff who undertook the review together with the College staff we spoke to during our review.

Wylie & Bisset LLP			
Partner	Graham Gillespie	Partner	graham.gillespie@wyliebisset.com
Director	Stephen Pringle	Director of Internal Audit	stephen.pringle@wyliebisset.com
Assistant Manager	Al Malik	Assistant Internal Audit Manager	al.malik@wyliebisset.com

Ayrshire College			
Key Contacts:	Louise Park	Head of Student Funding	louise.park@ayrshire.ac.uk
	Liz Walker	Head of Financial Services	liz.walker@ayrshire.ac.uk
	Dara Wyper	Student Funding Team Leader	dara.wyper@ayrshire.ac.uk

Wylie & Bisset recognises the time provided by all the individuals involved in this review and would like to thank them for their assistance and co-operation.

The table below details the dates of our fieldwork and the reporting of the audit area under review

Audit Stage	Date
Fieldwork start	28 August 2023
Closing meeting	5 September 2023
Draft report issued	27 September 2023
Receipt of management responses	TBC
Final report issued	TBC
Submission to Scottish Funding Council	29 September 2023
Audit & Risk Committee	10 October 2023
No of audit days	4

A. Audit Certificate

Name of College: Ayrshire College

Auditors' Report to the Scottish Funding Council for the Period from 1 August 2022 to 31 July 2023

We have examined the books and records of the above college, including evidence of checks of 5% of applications and payments, with a sample size appropriate to the total number of applicants, and have obtained such explanations and carried out such tests as we considered necessary.

On the basis of our examination and of the explanations given to us, we report that the information set out in these forms is in agreement with the underlying records.

We also report that, in our opinion, the College used these funds in accordance with the SFC's conditions and the principles of the Education Maintenance Allowance programme.

We are satisfied that the systems and controls of the administration and disbursement of these funds are adequate.

Signature: Wylie and Bisset LLP

Name of Firm   Wylie and Bisset LLP

Date: 29 September 2023

B. Grading Structure

For each recommendation we make we assign a grading either as High, Medium or Low priority depending upon the degree of risk assessed as outlined below:

Grading Classification	
High	Major Weakness that we consider needs to be brought to the attention of the Audit & Risk Committee and addressed by Senior Management of the College as a matter of urgency
Medium	Significant issue or weakness which should be addressed by the College as soon as possible
Low	Minor issue or weakness reported where Management may wish to consider our recommendation

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Ayrshire College

Student Support Funds
2022 - 2023

+ September 2023

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Section	Page number

The matters raised in this report came to our attention during the course of our audit and are not necessarily a comprehensive statement of all weaknesses that exist or all improvements that might be made.

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Introduction

This report has been prepared following the conclusion of our audit of the Student Support Funds for the year ended 31 July 2023.

The audit certificate for the Scottish Funding Council (SFC) funds was submitted on 29th September 2023.

The audited signed return for the HE Discretionary find was submitted to the Students Award Agency for Scotland (SAAS) on 29 September 2023.

Summary of Recommendations

Current Year Recommendations	High	Medium	Low	Total
No recommendations raised	-	-	-	-

Prior Year Recommendations	High	Medium	Low	Total
There were no recommendations raised in 2021/22.				

1. Executive Summary

Overall Conclusion:

We have examined the records of Ayrshire College and have obtained such explanations and carried out such tests as we considered necessary. On the basis of our examination and of the explanations given to us, we report that the information set out in these forms is in agreement with the underlying records. We also report that, in our opinion, the College used these funds in accordance with the guidance issued by the SFC. We are satisfied that the systems and controls of the administration and disbursement of the SFC and SAAS funds are adequate.

Summary of Income & Expenditure

The table below provides a summary of the income and expenditure for each of the funds and provides details of the fund position at the end of the year. Further detail on the expenditure incurred by fund can be found at Appendix A.

	SFC					SAAS
	Bursary	**Discretionary**	**Childcare**	**Total**		**HE Discretionary**
Income	8,890,118	1,328,203	620,241	**10,838,562**		**207,551**
Virement	(1,288,375)	1,288,375	-	**-**		**-**
Expenditure	(7,229,539)	(2,616,578)	(391,874)	**(10,237,991)**		**(207,551)**
Under/(Over) Spend	**372,204**	**-**	**228,367**	**600,571**		**-**

We include for your reference comparative benchmarking data of the number and ranking of recommendations made for audits of a similar nature in the year ending 31 July 2022.

Benchmarking	High	Medium	Low	Total
Average no. recommendations in similar audits	-	1	-	1
Recommendations at Ayrshire College	-	-	-	-

As can be seen from the above table, the College has a lower number of recommendations in comparison to the colleges it has been benchmarked against.

3. Audit Arrangements

The table below details the dates of our fieldwork and the reporting of the audit area under review

Audit Stage	Date
Fieldwork start	28 August 2023
Closing meeting	5 September 2023
Draft report issued	27 September 2023
Receipt of management responses	TBC
Final report issued	TBC
Submission to Scottish Funding Council	29 September 2023
Audit Committee	10 October 2023
No of audit days	4

3. Audit Arrangements

We detail below our staff who undertook the review together with the College staff we spoke to during our review.

Wylie & Bisset LLP			
Partner	Graham Gillespie	Partner	graham.gillespie@wyliebisset.com
Director	Stephen Pringle	Director of Internal Audit	stephen.pringle@wyliebisset.com
Assistant Manager	Al Malik	Assistant Manager	al.malik@wyliebisset.com

Ayrshire College			
Key Contacts:	Louise Park	Head of Student Funding	louise.park@ayrshire.ac.uk
	Liz Walker	Head of Financial Services	liz.walker@ayrshire.ac.uk
	Dara Wyper	Student Funding Team Leader	dara.wyper@ayrshire.ac.uk

Wylie & Bisset appreciates the time provided by all the individuals involved in this review and would like to thank them for their assistance and co-operation.

A. Summary of Returns

Scottish Funding Council Return

Bursary Student Numbers & Expenditure								
	Students u18		Parentally Supported (At Home)		Parentally Supported (Away from Home)		Self-Supporting	
	Students	£	Students	£	Students	£	Students	£
Maintenance Allowances:	-	-	719	1,874,522	12	36,658	426	1,514,491
Residence Costs	-	-	-	-	-	-	-	-
Dependents Allowance	-	-	-	-	-	-	-	-
Study Expenses Allowance	-	-	663	114,602	10	2,021	401	66,149
Travel Expenses Allowance	-	-	88	44,678	3	1,852	303	117,814
Additional Support Needs Allowance	-	-	51	86,112	1	886	19	26,905
Total Numbers & Spend	**-**	**-**	**722**	**2,119,977**	**12**	**41,417**	**427**	**1,725,289**

A. Summary of Returns

Scottish Funding Council Return

Bursary Student Numbers & Expenditure						
	Care Experienced		**Universal Credit**		**Non-Maintenance**	
	Students	**£**	**Students**	**£**	**Students**	**£**
Maintenance Allowances:	435	2,517,576	357	286,721	-	-
Residence Costs	-	-	-	-	-	-
Dependents Allowance	-	-	-	-	-	-
Study Expenses Allowance	297	58,849	332	52,669	608	122,875
Travel Expenses Allowance	39	17,228	204	67,321	61	40,519
Additional Support Needs Allowance	40	53,916	30	62,221	77	63,010
Total Numbers & Spend	**435**	**2,647,569**	**360**	**468,932**	**617**	**226,404**
Total Bursary Funds Spent in 2022/23				7,229,539		

Scottish Funding Council Return

Discretionary Fund & Childcare Fund Expenditure						
	Discretionary Fund		Childcare Fund		Total	
	Students	£	Students	£	Students	£
At FE Level	2,070	2,616,578	104	244,169	2,174	2,860,747
At HE Level	-	-	53	147,717	53	147,717
Total	**2,070**	**2,616,578**	**157**	**391,874**	**2,227**	**3,008,464**

Auditors' Report

We have examined the books and records of the Ayrshire College and have obtained such explanations and carried out such tests as we considered necessary. On the basis of our examination and of the explanations given to us, we report that the information set out in these forms is in agreement with the underlying records. We also report that, in our opinion, the College used these funds in accordance with the Scottish Funding Council conditions. We are satisfied that the systems and controls of the administration and disbursement of these funds are adequate.

Principal's Signature:

Auditors' Name: Wylie & Bisset LLP

Auditors' Signature:

Date of Signature: 29 September 2023

A. Summary of Returns

Students Award Agency for Scotland (SAAS)

HE Discretionary Fund			
	Undergraduate Discretionary Fund £	**International Student Fund** £	**Total** £
Total funds available for disbursement	199,873	-	199,873
International Students Fund		7,678	7,678
Virement/Transfer from other Funds (HE only)	7,678	(7,678)	-
Total	**207,551**	**-**	**207,551**
Funds disbursed	207,551	-	207,551
Funds to be returned to SAAS	**-**	**-**	**-**

Auditors' Report

We have examined the books and records of the above institution and have obtained such explanations and carried out such tests as we considered necessary. On the basis of our examination and of the explanations given to us, we report that the information set out above is in agreement with the underlying records and in our opinion is in accordance with the relative statutory requirements. We are satisfied that the systems and controls of the administration and disbursement of these funds are adequate.

Appointed Auditor: Wylie & Bisset LLP   Date: 29 September 2023

B. Grading Structure

For each recommendation we make we assign a grading either as High, Medium or Low priority depending upon the degree of risk assessed as outlined below:

Grading Classification	
High	Major Weakness that we consider needs to be brought to the attention of the Audit & Risk Committee and addressed by Senior Management of the College as a matter of urgency
Medium	Significant issue or weakness which should be addressed by the College as soon as possible
Low	Minor issue or weakness reported where Management may wish to consider our recommendation

Wylie Bisset

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3 Hardman Square,
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Audit & Risk Committee

30/11/2023

Strategic Objective Reference:	Choose an item.		Choose an item.
	SO3 - Embedding a culture of open leadership and empowerment		Choose an item.
	SO5 - high performing college underpinned by excellence in stewardship and governance		Choose an item.
	Choose an item.		
Subject:	Draft Counter Fraud, Bribery and Corruption Policy		
Purpose:	To provide Members with a draft Fraud, Bribery and Corruption Policy		
Action Required:	Discussion		
Appendices:	Yes		

1. Summary of Key Points

This paper presents a draft Counter Fraud, Bribery and Corruption Policy for the consideration of the Committee. The Policy is based upon the initial guidance contained in the College Financial Regulations and this has been supplemented by the guidance contained in the Scottish Public Finance Manual.

This paper is initially being presented to the Committee to obtain their initial views of the Policy before it is considered by the College management team. The Policy will be returned to the next Committee meeting for approval.

2. Background

This paper presents a draft Counter Fraud, Bribery and Corruption Policy for the consideration of the Committee. The June 2023 Committee meeting had requested that the College extract the relevant fraud, theft and bribery sections from the Financial Regulations and create a separate Policy.

3. Assessment

The draft Policy was extracted from the Financial Regulations but required to be supplemented by:
- Introduction – which provides the context within which the Policy should be read.
- Purpose – notes the use of a fraud maturity model against which the College has made an initial assessment of its maturity.
- Counter Fraud Culture – sets out the zero tolerance of the College to fraud.
- Prevention
- Detection, investigation and enforcement – the College requires to consider the creation of a detailed fraud response plan.

4.   Proposals and Recommendations

No further proposals are included within this paper

5.   Risks

The lack of a clear Policy will result in the zero tolerance apporach of the College to fraud, bribary and corruption being weakend.

6.   Resource Implications

No further resource implications require to be noted.

7.   Equality and Diversity Impact Assessment

An impact assessment is not applicable given the subject of this paper.

8.   Sustainability

No sustainability implications reuqire to be noted.

9.   Consultation/Input

Choose an item.

The College will require to consult further with the Management Team before finalising the Policy.

Alan Ritchie
Vice Principal Finance and Infrastructure

23 November 2023

Counter Fraud, Bribery & Corruption Policy

CONTENTS

1. INTRODUCTION

1.1 This document details Ayrshire College's Policy on Counter Fraud, Bribery and Corruption.

1.2 The Scottish Public Finance Manual (SPFM) is issued by the Scottish Ministers to provide guidance to the Scottish Government (SG) and other relevant bodies on the proper handling and reporting of public funds. It sets out the relevant statutory, parliamentary, and administrative requirements, emphasizes the need for economy, efficiency and effectiveness, and promotes good practice and high standards of propriety.

1.3 The Criminal Finances Act 2017 is the UK Government's risk-based approach to combat corruption, money laundering and tax evasion. The Act came into effect in April 2017, with two new corporate offences relating to the failure to prevent the facilitation of tax evasion in September 2017, relating to the evasion of domestic UK tax and to foreign tax evasion. The College considers if other associated persons have the opportunity, motivation or means to criminally facilitate tax evasion offences and if so how this risk might be managed.

1.4 The College works closely with its Internal and External Auditors in the deterrence, prevention and detection of fraud and other irregularities to safeguard its assets and to mitigate the likelihood of fraud.

1.5 The National Fraud Initiative (NFI) in Scotland is a counter-fraud exercise led by Audit Scotland and overseen by the Cabinet Office for the UK. It uses computerised techniques to compare information about individuals held by different public bodies, and on different financial systems that might suggest the existence of fraud or error. It means that public bodies can act if any fraud or error has taken place, and it allows auditors to assess fraud prevention arrangements which those bodies have in place.

1.6 Ayrshire College follows the regulatory requirements and applicable legislation on the prevention, detection, investigation and enforcement of Counter Fraud, Bribery and Corruption including the Fraud Act 2006, the Bribery Act 2010 and the Criminal Offences Act 2017. The College also adheres to the guidance set out in the Scottish Public Finance Manual and participates in the National Fraud Initiative.

1.7 This Policy is closely aligned to the Scottish Government's Counter Fraud strategy, which outlines the approach for the prevention, detection, reporting and handling of fraud.

2. PURPOSE

2.1 The purpose of this Policy is to set out Ayrshire College's position and its approach to deter, prevent, detect and investigate counter fraud, bribery and corruption and enforce appropriate and effective sanctions.

2.2 Ayrshire College:

- Has a duty to ensure that it safeguards assets and public money that it is responsible for.
- Expects the highest standards of conduct and integrity from all persons that have dealings with it, including Board members, staff, contractors, volunteers, students and the general public.
- Is committed to the elimination of fraud and corruption, and to ensuring that all activities are conducted ethically, honestly, and to the highest standards of openness and accountability to protect public safety and public money.

2.3 A Counter Fraud Maturity Model supports this Policy and provides guidance on how mature the College's counter fraud controls are and will evaluate its counter fraud maturity against the Scottish Government's Counter Fraud Maturity Model (Annex A).

2.4 The Model provides a focus on continual improvement in updating policies regularly to respond to and communicate any changes to governance standards. Consideration of the College's current policies, controls and procedures that are in place show as a minimum the College is at the 'established' stage of the model. The counter fraud controls are shown below and the maturity of each highlighted on the Counter Fraud Maturity Model.

3. SCOPE

3.1 The terms of this Policy will apply to all College staff and stakeholders. Failure to adhere to this Policy may lead to disciplinary action being taken against any individual/s concerned.

3.2 This Policy shall comply with current and future legislation.

4. PROMOTING A COUNTER FRAUD CULTURE

4.1 **The College has a zero-tolerance approach to fraud**. There is no acceptable level of fraud. There is a role for all members of staff in establishing an effective counter fraud culture by engaging and being alert to the risk of external and internal fraud; identifying suspicious activities and control weaknesses; and reporting any suspicions quickly and appropriately.

4.2 Our approach to counter fraud aims to ensure that a zero-tolerance culture to fraud is maintained and that fraud is effectively managed at all levels of the College's service delivery as follows:

- Committing to clear ethical standards through a formal counter fraud Policy.
- Communicating our attitude to fraud by raising awareness of our Policy to all staff.
- Supporting all staff in their responsibilities in preventing and detecting fraud through guidance and training.
- Providing managers with specialist support in designing, operating and reviewing internal controls.
- Maintaining comprehensive procedures for preventing and detecting fraud that must be carefully followed and monitored.
- Protecting members of staff through a robust process for reporting suspicions of fraud.
- Using data and technology efficiently in the systems in place to combat fraud.
- Sharing knowledge of vulnerabilities and lessons learned through strong communication channels.

5.   RESPONSIBILITIES

5.1 The College is responsible for establishing arrangements for the prevention and detection of fraud, error and irregularities, bribery and corruption and to ensure that affairs are managed in accordance with proper standards of conduct by putting proper arrangements in place.

5.2 **Responsibilities of Board Members**
As nominated representatives, all members of the College Board have a duty to protect the College and public money from any acts of fraud and corruption. This is achieved through the Governance Framework including compliance with the Code of Conduct for Members and the College's Financial Regulations. Conduct and ethical matters are specifically brought to the attention of members during induction and include the declaration and registration of interests.

5.3 **Responsibilities of the Executive and Leadership Teams**
The Executive and Leadership Teams are responsible for the communication and implementation of this Policy and for ensuring that employees are aware of the College's Financial Regulations, policies and procedures and that the requirements of each are being met.

5.4 **Responsibilities of the Vice Principal Finance and Infrastructure**
All suspected instances of fraud or corruption should be reported to the Vice Principal Finance and Infrastructure. Appendix B sets out the College reporting procedure.

The responsibilities of the Vice Principal Finance and Infrastructure include:

- Planning for the proper administration of the College's financial affairs and the responsibility for the administration of those affairs.
- Compliance with the statutory requirements for accounting and audit.
- The proper exercise of delegated powers as set out in the College's financial regulations and policies.
- Following up any issues or concerns identified through the National Fraud Initiative.

5.5   **Responsibilities of Employees**
Each employee is governed in their work by the College's Financial Regulations and other policies, including procedures on gifts and hospitality, codes of conduct associated with professional and personal conduct and conflict of interest.

5.6   **Students and the Public**
This Policy enables concerns raised by College students and the public to be investigated.

Conflicts of Interest
5.7   Board members and employees must ensure that they avoid situations where there is a potential for a conflict of interest. Such situations can arise with externalisation of services, tendering, planning and daily transactions etc. Effective role separation and internal controls will ensure that decisions made are based upon impartial advice and avoid questions about improper disclosure of confidential information.

6.   ROLE OF AUDIT

6.1.   The College works closely with its Internal and External Auditors in the deterrence, prevention and detection of fraud and other irregularities to safeguard its' assets and to mitigate the likelihood of fraud.

6.2   **Internal Audit**
Internal audit provides the Board of Management and the Principal with independent assurance on the Boards' overall risk management, internal control and corporate governance processes to ensure that systems and procedures are in place to prevent and deter fraud and corruption. The internal audit annual plan advises the Audit and Risk Committee on findings and gives the Committee assurances on the College's operational controls. Internal audit may be requested to investigate cases of suspected financial irregularity, fraud or corruption in accordance with agreed procedures. Internal auditors are empowered to:

- Have access to all records, documentation and correspondence relating to any financial and other transactions as considered necessary.
- Have access to records belonging to third parties such as contractors when required.
- Request and receive such explanations as are regarded necessary concerning any matter under investigation.

Internal auditors liaise with senior management to recommend changes in procedures to reduce risks and prevent losses to the College. They also have direct access to the Chairman of the Audit and Risk Committee and the Board.

6.3 **External Audit**

This is currently overseen by Audit Scotland through specific powers in appointing the College's external auditors. Auditors review the arrangements in place to maintain standards of conduct including Codes of Conduct for Board members and staff, the College's Counter Fraud, Bribery and Corruption Policy and associated fraud response plan ensuring there are established procedures for preventing and detecting any breaches of standards. Reviews are designed to test the adequacy of the College's financial systems and arrangements for preventing and detecting fraud, bribery and corruption. External Auditors present their findings to the Audit and Risk Committee.

7. PREVENTION

7.1. The College will prevent fraud through improving systems and controls, promoting an anti-fraud culture and supporting the effective management of fraud risks.

7.2. Preventative measures can be classified under two broad headings:

Policies and Procedures, Frameworks and Codes
- Board members, Executive and Leadership teams and staff must be aware of and have access to the College's Policy and procedures framework including the Financial Regulations and Code of Conduct.
- References will be taken up for all new permanent and temporary staff to verify their suitability, honesty and integrity.

Systems
- The College has and will maintain systems and procedures which incorporate internal controls, including adequate separation of duties to ensure that as far as possible, errors, fraud and corruption are prevented.

- Finance Procedures detail key financial systems and provide guidance, which underpins the College's Financial Regulations.

- The Executive and Leadership teams are responsible for ensuring that appropriate internal controls are properly maintained.

8. DETECTION, INVESTIGATION AND ENFORCEMENT

8.1 The College will handle fraud by being proactive in analysing data to identify areas at risk of fraud, by being effective and professional in our investigations of specific cases and by maintaining a robust whistleblowing procedure.

8.2 All suspicions or concerns of fraudulent or corrupt practice will be investigated. There will be no distinction made in an investigation and/or action between cases that generate financial benefits and those that do not.

8.3 Concerns should be raised when Board members, employees, students or a member of the public reasonably believe that one or more of the following actions has occurred, is occurring or is likely to occur:

- A criminal offence.
- A failure to comply with a statutory or legal obligation.
- Improper or unauthorised use of public or other official funds.
- A miscarriage of justice.
- Maladministration, misconduct or malpractice.
- The offer, promise, or giving of financial or other advantage to another person in return for the person improperly performing a relevant function or activity.
- Requesting, agreeing to receive or accepting a financial or other advantage intending that, in consequence a relevant function or activity should be performed improperly.
- Bribing another person for the purpose of obtaining or retaining business for the College.
- Deliberate concealment of any of the above.

8.4 Internal audit plays an important role in the detection of fraud and corruption. Included within the operational audit plans are reviews of system controls including financial controls and specific fraud and corruption tests, spot-checks and occasionally unannounced visits.

8.5 When fraud or corruption has occurred due to a breakdown in the College's systems or procedures, the Executive will ensure that appropriate improvements in systems of control are implemented in order to prevent a reoccurrence.

8.6 After an initial investigation, if any allegations of improper behaviors by Board members or employees are considered to be a disciplinary matter the College's

Disciplinary Procedures will be used to facilitate a thorough investigation.

8.7 **Disciplinary Action**
The College will deal firmly with those who defraud the College or who are corrupt, or where there has been financial malpractice.

Disciplinary action will be taken in addition to, or instead of, criminal proceedings depending on the circumstances of each individual case.

Theft, fraud, bribery and corruption are serious offences which may constitute gross misconduct against the College and employees will face disciplinary action if there is evidence that they have been involved in these activities.

8.8 **Prosecution**
In terms of proceedings the College will act in relevant cases to deter others from committing offences against the College.

8.9 **Publicity**
The College will optimise publicity opportunities associated with counter fraud, bribery and corruption activity within the College. Wherever possible, where the College has suffered a financial loss, action will be taken to pursue the recovery of the loss.

9. GOVERNANCE AND MONITORING

9.1 This Policy underpins the College's strategic aims and responsibilities outlined in its Strategic Plan. The College will continue to provide high quality services, minimise inconvenience to students and stakeholders, and take full advantage of secure digital solutions to safeguard public funds and do its utmost to prevent fraud.

9.2. Counter fraud arrangements will be evaluated following the implementation of the Counter Fraud Maturity Model (Appendix A). Progress will be monitored by the Audit and Risk Committee and will be reported through the Annual Governance Statement.

9.3 The internal audit annual plan advises the Audit and Risk Committee on findings and gives the committee assurances on the College's operational controls. In addition, the College's external auditors annually review the operational controls and present their findings to the Audit and Risk Committee.

9.4 These governance arrangements provide the College's Principal and Chief Executive, and the Scottish Funding Council's Chief Executive as the accountable officer for the Further Education Sector, with the assurances required to complete the annual governance statement which is published with the Annual Report and Accounts.

9.5 The College will evaluate its counter fraud maturity against the Scottish Government's Counter Fraud Maturity Model to monitor our development with a view to progressing through the stages of the life cycle to become a leading institution.

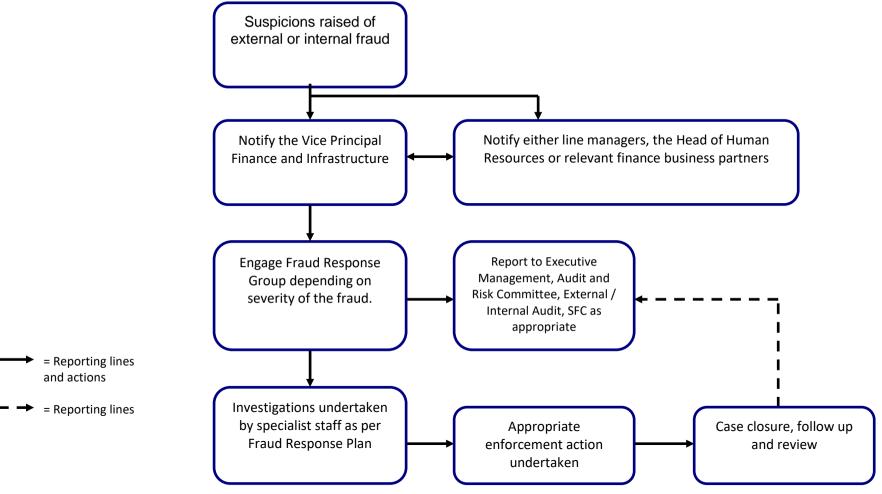## 10. EFFECTIVE DATE OF POLICY

This Policy is effective from 1 December 2023 and supersedes all previous policies. This Policy will be reviewed whenever changes affect it, or in two years, whichever is the earlier.

APPENDIX A: COUNTER FRAUD MATURITY MODEL

Counter Fraud Controls	Initial	Developing	Established	Progressive	Leading
Ethics	Ethical standards are in place and communicated but are not comprehensive.	Clear ethical standards are in place including a formal counter fraud Policy.	Clear ethical standards are in place through a formal counter fraud Policy, and codes of conduct.	Clear ethical standards are promoted through a formal counter fraud policy, and codes of conduct including the prevention of bribery and corruption.	Counter fraud policy is embedded within the overall organisational strategy and business planning.
Policies	A fraud response plan is in place.	A fraud response plan is in place alongside other policies such as register of interests.	A fraud action plan is in place alongside other policies such as register of interests.	Fraud is dealt with effectively through implementation of a comprehensive fraud action plan, and other policies such as register of interests.	Focus is on continual improvement in updating policies regularly to respond to, and communicate, any changes to governance standards.
Training & Development	Guidance in preventing fraud, bribery and corruption is available to staff.	Guidance in preventing fraud, bribery and corruption is available to staff. Training is promoted but not supported corporately.	Guidance and training in preventing fraud, bribery and corruption is available to staff.	All staff and stakeholders are supported in their responsibilities in preventing fraud, bribery and corruption through guidance and	Knowledge and skills are updated regularly keeping up to date with any changes to professional standards.
Risk Assessment	Fraud risk assessments are ad hoc.	Fraud risk assessments are undertaken in key areas of the organisation.	Fraud risk assessments are undertaken across the organisation.	Fraud risk assessments are comprehensive and undertaken across the organisation.	Fraud risk assessments are embedded within the overall organisational risk assessment processes.
Monitoring Controls	Designing, operating and reviewing internal controls are not integrated.	Managers are encouraged to counter fraud designing, operating and reviewing internal controls.	Support is available for designing, operating and reviewing internal controls.	Managers are provided with specialist support in designing, operating and reviewing internal controls.	Using data, and technology, efficiently in current and future systems, to combat fraud and error.
Reporting Arrangements	Processes for reporting suspicions of fraud are not clear.	A process is in place for reporting suspicions of fraud.	Protecting members of staff through a robust process for reporting suspicions of fraud.	Members of staff are protected through a robust process for reporting suspicions of fraud, bribery and corruption.	Quantitative and qualitative reporting of fraud metrics is in place for the organisation.

Counter Fraud Controls	Initial	Developing	Established	Progressive	Leading
Investigation & Response	Allegations of fraud are investigated as a priority as resources allow.	All allegations of fraud are investigated.	All allegations of fraud are investigated by skilled staff.	A comprehensive and coordinated approach is applied to all allegations of fraud including professional investigation by skilled staff.	High-risk areas are proactively assessed and analysed for potential fraud by professionally trained staff.
Communication	Communications to deter fraud are issued occasionally to staff.	The commitment to deter fraud is communicated by raising awareness of policies to staff.	The commitment to deter fraud is communicated by raising awareness of policies to all staff on a regular basis.	The commitment to deter fraud, bribery and corruption is communicated by raising awareness of policies to all staff on a regular basis.	Comprehensive communication lines in place to deter fraud, bribery and corruption by raising awareness of policies to all staff and stakeholders.

APPENDIX B: REPORTING AND RESPONDING TO FRAUD

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                    ┌─────────────────────────┐
                    │   Suspicions raised of  │
                    │  external or internal   │
                    │          fraud          │
                    └───────────┬─────────────┘
                                │
            ┌───────────────────┴───────────────────┐
            ▼                                        ▼
┌──────────────────────┐              ┌──────────────────────────────┐
│  Notify the Vice     │◄────────────►│  Notify either line managers,│
│  Principal Finance   │              │  the Head of Human Resources │
│  and Infrastructure  │              │  or relevant finance         │
│                      │              │  business partners           │
└──────────┬───────────┘              └──────────────────────────────┘
           │
           ▼
┌──────────────────────┐              ┌──────────────────────────────┐
│  Engage Fraud        │              │  Report to Executive         │
│  Response Group      │─────────────►│  Management, Audit and Risk  │
│  depending on        │              │  Committee, External /       │
│  severity of the     │              │  Internal Audit, SFC as      │
│  fraud.              │              │  appropriate                 │
└──────────┬───────────┘              └──────────────────────────────┘
           │                                         ▲
           ▼                                         ┊
┌──────────────────────┐   ┌──────────────┐   ┌──────────────────────┐
│  Investigations      │   │  Appropriate │   │  Case closure,       │
│  undertaken by       │──►│  enforcement │──►│  follow up and       │
│  specialist staff    │   │  action      │   │  review              │
│  as per Fraud        │   │  undertaken  │   │                      │
│  Response Plan       │   │              │   │                      │
└──────────────────────┘   └──────────────┘   └──────────────────────┘
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──────► = Reporting lines and actions

- - - ► = Reporting lines

Under the **College Whistle-blowing procedures**, all matters will be dealt with in confidence and in strict accordance with the terms of the Public Interest Disclosure Act 1998. This statute protects the legitimate personal interests of staff.

Audit & Risk Committee

30/11/2023

Strategic Objective Reference:	Choose an item.		Choose an item.
	Choose an item.		Choose an item.
	SO5 - high performing college underpinned by excellence in stewardship and governance		Choose an item.
	Choose an item.		
Subject:	Rolling Audit Action Plan as at 31 October 2023		
Purpose:	To provide Members with an update on the Rolling Audit Action Plan		
Action Required:	To Note		
Appendices:	No		

1.   Summary of Key Points

This paper details the audit (internal and external) recommendations and the status of the actions taken by management. The College has three outstanding audit recommendations, of which one was due to be completed.

The one recommendation due for completion has been closed.

The review of College evidence and closure of completed recommendations will be undertaken by the internal auditors in April 2024 and reported to the June 2024 Committee.

2.   Background

The Rolling Audit Action Plan is a standing agenda item for the monthly Senior Leadership Team and presented to each meeting of the Audit and Risk Committee.

3.   Assessment

The Rolling Audit Action Plan covers any audit recommendations made by the College internal and external auditors, once the audit reports and proposed management responses have been approved by the Audit and Risk Committee.

The 2023-24 Internal Audit Plan was approved by the Audit and Risk Committee on 6 June 2023. The College considers that it is making good progress to closing off the outstanding recommendations.

4. Proposals and Recommendations

No further proposals are included within this paper

5. Risks

An effective and challenging audit service is a key element in the management of risk within the College.

6. Resource Implications

No further resource implications require to be noted.

7. Equality and Diversity Impact Assessment

An impact assessment is not applicable given the subject of this paper.

8. Sustainability

The College's internal and external audit function is targeted at key areas for the College. The function is directed to identify areas for improvement and ensure effective delivery of the College's strategic objectives. This includes being a sustainable organisation.

9. Consultation/Input

No formal consultation is required given the subject of this paper.

Alan Ritchie
Vice Principal Finance and Infrastructure

23 November 2023

ROLLING AUDIT ACTION PLAN

	Audit Finding	Risk	Audit Recommendation	Action Owner	Due Date	Management Response	College Update		
							Status	Date Completed	Update / Evidence Provided
	Financial Regulations								
1	The College should have detailed Financial Regulations in place to govern the financial activities throughout the College. During our review, we found that the College has a detailed and robust Financial Regulations document. We do note, however, that there is no reference to Dormant Bank Accounts in the Financial Regulations, although we note that the College does not have any Dormant Bank Accounts. The College has procedures in place for the following, however, they are not documented in the Financial Regulations or in standalone policies: ☐ New Supplier Set Up; and ☐ Changing of Bank Details for Staff and Suppliers. There is a risk that the Financial Regulations do not adequately outline	Low	We recommend that the College includes sections on the aforementioned areas within their Financial Regulations.	Vice Principal - Finance and Infrastructure	30 November 2025	Accepted. The College will include reference to procedures re dormant bank accounts and new supplier set up and verification checks completed on suppliers and staff bank accounts in the next version of the Financial Regulations when reviewed in 2025.	Progressing		The College is currently undertaking a review of the Financial Regulations following the recent appointment of the Vice Principal Finance and Infrastructure. The revised document will included the recommended process re dormant accounts and changes in supplier details. A revised version will be provided to BRI Committee in March 2024
	FES								
2	The College should ensure that Fee Waiver Forms are appropriately signed by the student in line with SFC guidance. During our review, our sample testing highlighted that 1 of our sample of 15 tested had not signed the Fee Waiver Form. This was due to a temporary member of staff accepting the letter unsigned. We note that the form had been stamped by the Job Centre to confirm the student's eligibility. There is the risk that this could make the claim invalid, which could result in a fee waiver being funded by the SFC in error.	Low	We recommend that the College ensures that Fee Waiver Forms are signed by the student before being returned to the College.	Vice Principal - Finance and Infrastructure	31 October 2023	The Financial Services Team will be reminded of the importance of ensuring the student's signature is obtained on all Fee Waiver Forms.	Closed	5 October 2023	Members of staff were reminded, verbally, to ensure that sign-off procedures were in place, particularly when mentoring temporary / new members of staff.
	Budget and Monitoring (IA)								
3	It is good practice for any College to provide training to their Budget Holders with regards to the various responsibilities due to be fulfilled with their position. It was identified that budget holders had been provided with very limited training with regards to their duties and would rely on their experience and the Financial Regulations document to provide guidance where required. This can result in budget holders potentially making mistakes if they encounter an issue they have not dealt with before.	Low	We recommend that Budget Holders are provided with training and refresher training periodically to ensure their knowledge and abilities are up to standard, giving them an opportunity to further develop and improve in areas where they maybe lacking. The College may want to consider creating a training schedule to help future plan training, and document those individuals who have undergone training, and these who are yet to receive it.	Head of Financial Services	31 March 2024	Many budget holder have been in post for some years and are familiar with all processes, however we will ensure that all new budget holders received relevant training in the first month of their appointment. Finance are also working on a budget holders manual which will be issued to all budget holders.	Progressing		The College is reviewing its management programme (Evolve) and this will include a section on Financial Management. This section will partially address the recommendation. A budget holder handbook has been drafted and is currently being finalised. This will be issued to all budget holders in Q1 2024
	Area								
4									