

**West College Scotland
AUDIT COMMITTEE**

**1 DECEMBER 2021 at 4.00 p.m.
By TEAMS**

AGENDA

General Business

- | | | |
|--|----------------------|----------------|
| 1. Welcome and Apologies | | Chair |
| 2. Declaration of Interests | | Chair |
| 3. Minutes of the meeting held on 8 September 2021
Actions from the Minutes | Enclosed
Enclosed | Chair
Chair |
| 4. Matters arising from the minutes not otherwise on the agenda
None | | |

Main Items for Discussion and/or Approval

External Audit

- | | | |
|---|---------|----|
| 5. External Audit Annual Effectiveness Review | Paper 5 | SG |
|---|---------|----|

Internal Audit

- | | | |
|--|---------|----|
| 6. Internal Audit Report – Cash Management | Paper 6 | SP |
| 7. Internal Audit Report – Financial Regulations | Paper 7 | SP |
| 8. Internal Audit Annual Plan 2021-22 | Paper 8 | SP |
| 9. Rolling Audit Action Plan | Paper 9 | AR |

Other

- | | | |
|--|----------|----|
| 10. Risk Management Proposal | Paper 10 | AM |
| 11. Register of Interest for Board and Committee Members | Paper 11 | SG |

Items for Information (to note only)

- | | | |
|----------------------------------|----------|----|
| 12. Schedule of Business 2021-22 | Paper 12 | AR |
| 13. Any other business | | |

Next meeting:
Audit Committee 2 March 2022 at 4.00 p.m. by TEAMS

**Shirley Gordon
Secretary to the Committee**

AUDIT COMMITTEE

MINUTES: Wednesday 8 September 2021.

PRESENT: Graeme Bold (in the Chair), Grant Lyall.

ATTENDING: Liz Connolly (Principal), Amy McDonald (Vice Principal, Operations), Alan Ritchie (Director of Finance), Shirley Gordon (Secretary to the Committee), Nathan Tyler (Director Communications, Policy and Engagement).

**ATTENDING
BY**

INVITATION: Stephen Pringle (Wylie & Bisset), Joanne Buchanan (Mazars).

APOLOGIES: Wai Wong

AM585 WELCOME AND APOLOGIES

The Chair welcomed everyone to the meeting and apologies were noted.

Introductions were made as the recently appointed Vice Principal, Operations and Director Communications, Policy and Engagement were attending their first Audit Committee meeting.

AM586 DECLARATIONS OF INTERESTS

- Liz Connolly - Trustee of West College Scotland Foundation; Member of Developing the Young Workforce (DYW) West Regional Board.

AM587 MINUTES

The minutes of the meeting held on Thursday 20 May 2021 **were approved**.

AM588 ACTIONS FROM THE MINUTES

The Committee **noted** the actions taken and outstanding since the last meeting and **agreed** that the completed actions could now be removed.

AM589 MATTERS ARISING FROM THE MINUTES (AND NOT OTHERWISE ON THE AGENDA)

One matter arising was raised that was not already covered by agenda items.

.1 IT Incident Update – the Director of Finance reported that he would circulate the final IT Incident Report to Audit Committee members for information after its consideration by the Corporate Development Committee at its meeting to be held on 14 September 2021. **{ACTION – AR}**

AM590 COMMITTEE REMIT, MEMBERSHIP AND DATES OF MEETINGS IN 2021-22

Given this was the first Audit Committee meeting of the academic session, the Secretary asked the Committee to consider and approve the Audit Committee remit, current membership and 2021/22 meeting dates.

It was noted that Sabira Akram (Audit Committee Vice Chair) had resigned as a Board member on 23 August 2021. The Secretary confirmed that interviews had been held for 5 new Board members with the Board Chair presenting a paper for approval at the 4 October 2021 Board meeting and, thereafter, writing to seek Ministerial approval for their appointments. Mr Bold reported that when the new

Board members took up office, it was the Board Chair's intention to assign them to membership of the Standing Committees.

The Committee approved its remit, membership and 2020/21 meeting dates.

AM591 DRAFT 2020-21 ANNUAL REPORT FROM THE COMMITTEE TO THE BOARD

The Chair of the Audit Committee detailed the work carried out by the Audit Committee during the period 1 August 2020 to 31 July 2021 and explained that the Annual Report was a requirement of both the Scottish Funding Council (SFC) Financial Memorandum and the Scottish Public Finance Manual, and the report complied with the requirements of these documents.

The Director of Finance led the Committee through the report and noted that, despite the governance and operational challenges faced by the College, the 2020-21 schedule of Committee business was completed within the year.

In respect of the College Assurance Map and process, it was agreed that this be given more prominence in the report. **{ACTION – AR}**

Based on the assessments and reports provided by the internal / external auditors and College management, the Audit Committee was satisfied that its responsibilities to the Board of Management had been satisfactorily discharged for the 2020-21 year.

The Audit Committee approved the content of the draft Annual Report from the Audit Committee to the Board of Management.

AM592 ANTI-FRAUD AND CORRUPTION POLICY

The Director of Finance explained that the Audit Committee remit included the requirement *'to review and advise the Board of the Internal Auditor's and External Auditor's assessment of the effectiveness of the College's financial and other internal control systems, including controls specifically designed to prevent or detect fraud or other irregularities as well as those for securing economy, efficiency, and effectiveness (value for money).'*

Mr Ritchie added that the Committee's Schedule of Business indicated the reports that the Committee would receive in discharging that duty and the review and approval of the College Anti-Fraud and Corruption Policy was one of those aspects.

Mr Ritchie summarised the Audit Scotland 'Fraud and Irregularity 2020-21' report as issued in July 2021 and highlighted the five recommendations for public bodies to consider ensuring good governance and counter fraud arrangements were in place. He confirmed that the College had reviewed the seven key risk categories identified in the report and would continue to consider the ways to reduce the fraud risks highlighted and take appropriate action as required. He added that Audit Scotland issued a quarterly report which included a fraud section that the Finance Team proactively reviewed in relation to any actions that may be required by the College.

Mr Ritchie reported that the College Anti-Fraud and Corruption Policy had been reviewed and he led the Committee through amendments proposed confirming that the College legal advisors had reviewed the Policy to ensure it was up to date and reflected best practice. Mr Pringle added that the Policy had also been reviewed by Wylie & Bisset as part of a previous internal audit assignment.

Mr Ritchie summarised the mandatory annual fraud training for all College staff.

The Audit Committee:

a) Noted the content of the report.

b) Considered and approved the Anti-fraud and Corruption Policy.

AM593 2020-21 EXTERNAL AUDIT PROGRESS UPDATE

Joanne Buchanan, Audit Senior Manager, Mazars, provided a report on the progress made by Mazars in delivering their responsibilities as the College's external auditors. She also highlighted key emerging national issues and developments of interest to members of the Committee.

Ms Buchanan summarised key audit stages adding that overall, work was on track and there were no significant issues arising. She remained cognisant of the potential impact of the pandemic and would flex the timetable with the College, as appropriate.

She outlined the audit progress since the issue of the Audit Strategy Memorandum in May 2021 explaining that the final audit fieldwork was due to begin on 13 September 2021. Most of the audit fieldwork would be carried out remotely and the audit team had prepared accordingly to facilitate a smooth process including the setting up of a secure online portal for sharing information. This ensured easier tracking of information provided and was accessible to all members of the audit and Finance Team.

Detailed arrangements would be discussed and made with the Finance Team in the coming weeks to ensure the audit was carried out as efficient as possible. Ms Buchanan would report to the Joint Audit and Corporate Development Committee on 23 November 2021 with the Annual Audit Report and draft opinion on the financial statements. The accounts were due to be approved by the West College Scotland Board on 13 December 2021.

The Committee noted the content of the report.

AM594 ACCOUNTS DIRECTION FOR SCOTLAND'S COLLEGES 2020-21

The Director of Finance reported that the SFC issued mandatory guidance for the preparation of the annual report and accounts each year. He provided the Committee with an overview of the detailed requirements for the 2020-21 financial year.

Mr Ritchie set out the requirements for the preparation of the annual report and accounts the deadline of which was 31 December 2021. Two copies of the College annual report and accounts also required to be sent to the Auditor General for Scotland by 31 December 2021. The College was complying with the requirement for the reporting year to 31 July 2021 and Mr Ritchie highlighted key points arising from the 2020-21 SFC Accounts Direction and Guidance notes.

The Audit Committee noted the content of the report.

AM595 INTERNAL AUDIT REPORT 2020-21

Stephen Pringle, Wylie & Bisset, presented the Internal Audit Report 2020-21 which formed part of the suite of year-end reports and was designed to assist the Board of Management inform its governance statement contained within the College Financial Statements.

He documented the scope and responsibilities of both management and the Internal Auditors and reported the internal audit opinion on the adequacy and effectiveness of management's internal control systems as follows:

“We are satisfied that sufficient internal audit work has been undertaken to allow us to draw a conclusion as to the adequacy and effectiveness of the College’s risk management, control and governance processes. In our opinion West College Scotland did have adequate and effective risk management, control and governance processes to manage its achievement of the College’s objectives at the time of our audit work. In our opinion, the College has proper arrangements to promote and secure value for money. However, we were only able to provide ‘weak’ assurance around the review of External Communications – Website. The College accepted all of the internal audit recommendations and will be undertaking the required actions to address the weaknesses identified. We were also asked to undertake additional work during the year as a result of an IT incident. From the work undertaken we were able to provide ‘Strong’ assurance on the College’s response to the incident.”

The Audit Committee considered and approved the contents of the Internal Audit Report 2020-21.

AM596 ROLLING AUDIT ACTION PLAN

The Director of Finance explained that the purpose of the Rolling Audit Action Plan (RAAP) was to update the Audit Committee on the status of the recommendations made by both the internal and external auditors.

Mr Ritchie led the Committee through the report, summarising the movement in relation to the audit recommendations made since the last meeting and confirmed that the RAAP was reviewed by the staff with responsibility for the implementation of the audit recommendations on an ongoing basis. Mr Ritchie reported that the College considered that, despite the continuing challenges of Covid-19, good progress had been and was being made in addressing the recommendations made by the internal and external auditors.

The Audit Committee:

- **Considered the Rolling Audit Action Plan Progress Review Report.**
- **Approved the Rolling Audit Action Plan.**

AM597 REVIEW OF STRATEGIC RISK REGISTER

The Director of Finance presented the current College Strategic Risk Register for consideration and highlighted amendments recently made explaining that mitigating controls across all risks had been reviewed by the responsible member of the Senior Management Team (SMT) and, where appropriate, controls had either been inserted, updated, or removed.

Mr Ritchie explained how the management and mitigation of fraud was discussed by the SMT at and operational level, however, if there was a concern or if a risk escalated, it would be elevated to a strategic risk.

The Committee discussed Risk No 4 “Impact upon Business Continuity Planning of Covid-19 Pandemic”. The Principal explained that the College followed sector wide guidance and worked with Public Health Scotland, as required, having established processes and procedures around this. The College believed it was able to react quickly to any future Government Covid measures which may be made and had already done so at the start of the new 2021/22 academic year which had seen students returning to campuses. Additionally, engagement with the staff unions

enabled staff feedback to be acted upon timeously. The risk mitigations in place went beyond those currently set out nationally and that would continue to be the case to ensure staff and students were able to work and study in a safe environment. The Committee was satisfied that, given the continued degree of uncertainty, and changing national guidance around Covid 19, the impact and probability scores associated with this risk were applicable.

The Audit Committee reviewed the current Strategic Risk Register and in doing so considered:

- o **The risks included in the register.**
- o **The revised risk rating both pre and post mitigation.**
- o **Whether any other risks should be considered for removal.**
- o **Whether any new risks should be considered for inclusion.**

AM598 REPORT ON FREEDOM OF INFORMATION AND DATA PROTECTION ACT REQUESTS / HOSPITALITY AND GIFTS REGISTER

The Director of Finance reported that the remit of the Committee required it to receive an annual report on:

- a) Public Interest Disclosure;
- b) Freedom of Information and Data Protection Acts requests;
- c) Gifts and Hospitality registers

Mr Ritchie detailed an update regarding each of the above areas.

The Audit Committee noted the 2020-21 report.

AM599 SCHEDULE OF BUSINESS 2021-22

The Director of Finance outlined the remit of the Audit Committee and how the schedule of business assisted in fulfilling this. The schedule of business was also used to inform the Annual Report of the Chair of the Audit Committee to the Board of Management.

The Committee noted the 2021-22 Schedule of Business.

AM600 ANY OTHER BUSINESS

- No other business was raised.
- Date of Next meetings:
 - ❖ Joint Committee 23 November 2021 at 4.00pm by TEAMS
 - ❖ Audit Committee 1 December 2021 at 4.00 p.m. by TEAMS

Audit Committee: Actions from the Minutes

Date of Meeting	Min Ref	Matter for Action	Responsible Person	Action Taken	Timescale (where applicable)
8 Sept 2021	AM591	Draft 2020-21 Annual Report from The Committee to The Board - in respect of the College Assurance Map and process, it was agreed that this be given more prominence in the report.	A Ritchie	Annual report content updated and agreed with Committee members.	Complete Presented to 23 November 2021 Joint Committee
20 May 2021 and 8 Sep 2021	AM565, AM567 and AM589	IT Incident Update Report - circulate to Audit Committee members the Corporate Development Committee Cyber Resilience Framework update and Trusted IA reports following their consideration at CDC meeting.	A Ritchie	To be considered at CDC meeting on 14/9/21 and will be circulated after meeting.	Complete Electronically circulated to members after 14 September 2021 CDC Committee

Meeting	Audit Committee
Date	1 December 2021
Location	MS Teams
Title of Paper	Internal Audit Report – Cash Management
Presented By	Stephen Pringle Wylie & Bisset
Recommendation to Members	Consideration
Appendix Attached	Yes 06(a) – Internal Audit Report - Cash Management

PURPOSE

As part of the 2021-22 Internal Audit Plan, Wylie & Bisset conducted an internal audit to provide assurance that the cash management practices as outlined in the College Financial Regulations are suitable and have been adopted. Wylie & Bisset also assessed the reporting arrangements in place to the Board of Management and the Scottish Funding Council (SFC).

The paper is presented in line with West College Scotland Audit Committee Terms of Reference:

'To agree the Internal Audit Plan and review the Internal Audit Annual Report'

The paper is submitted *For Consideration*.

1. BACKGROUND

- 1.1 Wylie & Bisset, as the appointed internal auditors of the College, undertook a review to provide assurance that the cash management practices as outlined in the Financial Regulations are suitable and have been adopted by the College. They also assessed the reporting arrangements in place to the Board of Management and the Scottish Funding Council (SFC).
- 1.2 Their review assessed the implementation, monitoring, and execution of the treasury/cash management responsibilities along with the delegated authorities in this area.
- 1.3 The assignment forms part of the 2021-22 Annual Internal Audit Plan.

2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 The scope of the review can be found on page 2 of Appendix A, and was agreed by the College prior to the commencement of the audit.
- 2.2 The overall audit report assurance level is STRONG with the conclusion being

'We can provide a strong level of assurance over the College's cash management arrangements and can confirm these are in line with the College's Financial Regulations. We can also provide a strong level of assurance over the reporting arrangements in place to the Board of Management and the SFC. We can also confirm that there is appropriate delegated authorities and responsibilities within the area of cash management. We have raised no recommendations and 1 Observation. We have also highlighted 10 good practice points from our audit work.'

- 2.3 The report makes no recommendation and on page 10 highlights 10 areas of good practice.
- 2.4 One operational practice observation is made on page 13 related to the use of the correct form. This practice has been reviewed and strengthened through enforcing the requirement for the correct form to be used.

Next Steps

- 2.5 The College Assurance Map will be updated to show the outcome of this audit work.

3. FINANCIAL IMPLICATIONS

3.1 There are no financial implications in this report.

4. STUDENT EXPERIENCE

4.1 There are no student experience implications associated with this paper.

5. HUMAN RESOURCES IMPLICATIONS

5.1 There are no human resources implications associated with this paper.

6. LEGAL IMPLICATIONS

6.1 There are no further legal implications in this paper to those listed above.

7. REPUTATIONAL IMPLICATIONS

7.1 There are no reputational implications associated with this paper.

8. COMMUNITY/PARTNERSHIP IMPACT

8.1 There are no community implications associated with this paper.

9. EQUALITIES IMPLICATIONS

9.1 There are no equality implications associated with this paper.

10. ENVIRONMENT IMPLICATIONS

10.1 There are no environmental implications associated with this paper.

RECOMMENDATION

The Audit Committee is requested to consider and note the contents of the report.

West College Scotland

Internal Audit 2021-22

Cash Management
October 2021

Overall Conclusion

Strong

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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.

This report has been prepared solely for West College Scotland'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.

Overview

Purpose of review

We undertook a review to provide assurance that the cash management practices as outlined in the Financial Regulations are suitable and have been adopted. We also assessed the reporting arrangements in place to the Board of Management and the Scottish Funding Council (SFC).

Our review assessed the implementation, monitoring, and execution of the treasury/cash management responsibilities along with the delegated authorities in this area.

This assignment forms part of our Annual Internal Audit Plan for 2021/22.

Scope of review

Our objectives for this review were to ensure:

- The College is complying with its Financial Regulations and the Financial Memorandum with the SFC in terms of the cash and treasury management arrangements.
- The cash management process is robust and fit for purpose, with an appropriate approval and reporting process in place to ensure the College has sufficient working capital to continue operating.
- There are appropriate cash and banking procedures in place which include the process for cash and bank reconciliations, and which are being followed by staff.
- There are appropriate levels of segregation of duties between the staff involved in the implementation, monitoring, and execution of treasury/cash management and with the delegated authorities.

Limitation of scope

There were no limitations of scope.

Background Information

Financial Regulations and Procedures

The College has a set of robust Financial Regulations which comply with the SFC's Financial Memorandum and the Scottish Public Finance Manual requirements. The College's Financial Regulations take cognisance of CIPFA's Model Set of Financial Regulations for Academies, Colleges and Universities.

The College also has procedures in place in respect of the following:

- Cash and Bank;
- Procedure for Cash Requests; and
- Credit Card Process.

From our review we found these to be sufficient for the College's purpose.

Bank Accounts

The College are required by its Financial Memorandum with the SFC to follow the Scottish Public Finance Manual requirements and as such the Scottish Government Banking Service. As a result of this the College's primary banking services are provided by the Royal Bank of Scotland. It should be noted that the contract with the Royal Bank of Scotland is in its final year with the contract due to end on 31 July 2022. The College are waiting for information from the SFC on the new banking services arrangements which will be implemented as required.

The College holds the following bank accounts with the Royal Bank of Scotland:

- Main current account; and

- Separate bank accounts for Bursary, Discretionary, Childcare and EMA funds.

The College also has the following other bank accounts:

- Bank of Scotland Servicing account – this is part of an existing loan agreement to service an inherited debt.
- Clydesdale bank loan account – there is no outstanding balance remaining on this loan. The College is in discussion with the bank to close this account.
- Bank of Scotland loan account.

The College provide an annual update to the Corporate Development Committee regarding the banking arrangements at the College. This includes compliance with bank loan covenants, details of bank mandates and signatories and details of the credit cards in operation within the College.

Monthly SFC Draw Down and Cash Flow

The process for the monthly draw down from the SFC and the cash flow analysis are directly linked. It is the Principal Accountant who is responsible for generation of the monthly cash flow and draw down which is submitted to the SFC.

The SFC will email the template they require the College to use in respect of the cash flow submission. The draw down submission must be done on the 1st working day of the month. The full submission of the cash flow must be forwarded to the SFC by 14th of the month. Payment will be made on 15th/16th of the month.

The treasury staff keep a cash analysis spreadsheet to which the Principal Accountant has access. This details the opening balance and the movement throughout the month to arrive at the closing balance. This gives the actual closing bank balances for the month. The Principal Accountant will use this to update the cash flow statement for historic transactions. The Principal Accountant will also consider likely expenditure during the forthcoming month compared with what was budgeted. From this she will arrive at the amount required to be drawn down for the next month. In addition, the full year cashflow is reconciled to the Management Accounts forecast position which is reported to SFC through the Financial Forecast Return (FFR). The College look to have approximately £3.5m core cash each month, which is approximately 30 days cash.

After the Principal Accountant completes the SFC's template for draw down and cashflow, it is passed to the Head of Finance and Student Funding for review. If the Head of Finance & Student Funding has any queries, she will discuss these with the Principal Accountant. Once the Head of Finance and Student Funding is satisfied with the draw down claim and cashflow this is passed to the Director of Finance for his review and approval. It is the Head of Finance and Student Funding who normally emails this to the SFC, which is the level allowable by SFC. In her absence this can be done by the Director of Finance or the Principal Accountant, as an exception. From our review and testing we can confirm that this process is operating in practice.

Payment Portal

The Payment Portal was a project that the College had been considering for a couple of years. The College initiated the project in 2019, however due to Covid-19 the project started later than planned. In March 2021, the project moved into the testing phase. The Head of Finance and Student Funding stated that the payment portal worked but there were issues with the course set up and enrolment processes used in the College. The College had to redesign some of its processes to ensure that the payment portal would pick up the correct data. (See recommendations raised in our Credits audit around fee waivers and some of these courses being allocated to other fee waiver categories rather than Cost Borne by the College).

The College used its current platforms to facilitate the payment portal - UNIT-e (student database) and BluQube 4 (finance system).

The fee sources in the payment portal are linked to the fee category used by the SFC, i.e., full-time non-advanced will be either bursary or self-financing - there are no other options available to the learner if their course falls within that category. The sub-set of the fee category is the residency of the learner. This plus the fee category is used to establish the finance source for the learners where they have selected to pay their own fees. This is not a requirement for those who are SAAS (HE courses), Bursary funded or ITA, as the College will match this to other information received for the learner, i.e., for bursary students the student record will show that the student is in receipt of a bursary and that all residency checks have already been completed. This is the same for SAAS funded students.

To ensure that the student is eligible for a fee waiver, which is not an 'automatic' fee waiver i.e., FT non-advance, DPG18/PG5, Schools etc, the Finance Team will run a report of those students and check that supporting documentation has been uploaded to the enrolment portal to confirm eligibility.

If the student is paying their own fee, they will be offered 3 options, namely:

1. Pay now
2. Pay later
3. Pay by instalment

1. Pay Now

The student will be redirected to Pay360 web page. This looks the same as the College's webpages, but it is an external page, to which the College does not have access, i.e., the College cannot see what the student is recording on the Pay360 page. As such the College do not get the details of the student's payment method, i.e., card number etc. The students complete this screen and confirms the payment. Once the payment has been confirmed, the student is returned to the College's webpage. Pay360 email the student with confirmation of the payment. The College also receive confirmation that a payment has been received for the student/course.

A Pay360 'End of Days' report is generated each day and automatically integrated into a holding file in Symmetry. The treasury staff will check to ensure that there is an End of Days report there and whether there are any transactions on this. If there are transactions the treasury staff will upload the file to BluQube 4 (the finance system). They will reconcile the money coming in via the bank accounts to the End of Days report to ensure that the correct amount has been received.

2. Pay Later

If the student selects to pay later, then the College's credit control staff will chase this up with the student as part of their credit control processes.

Alternatively, there is a tab on the student's UNITE account, which allows the student to 'pay outstanding balances', after the enrolment has been processed. If the student selects this, they will be taken to the same screen as that noted above. The same process will be followed as that noted above in the Pay Now scenario.

If the student wants to make a payment to the College when contacted by the credit control staff, a link is sent to the student (either by email or text message) while they are on the phone by the credit control staff; this link is facilitated by the Call Secure Digital Plus (CSDP) portal. The student is required to complete the payment pages with their card details etc. Similarly, to the Pay Now option above, the College cannot see

what the student is recording. The payment will be confirmed there and then, with the student and the College receiving an email notification of the successful payment. In this way, the College again do not have sight of the student's card details.

The payments via CSDP are included on the End of Days report as well.

3. Pay by Instalments

At present the full functionality of pay by instalment is not available on the payment portal. If the student wants to pay their fee by instalment, they are advised when they select this option, to contact the College's finance office to arrange this by way of Standing Order. The Head of Finance and Student Funding has stated this is still being developed alongside the UNITE and BluQube 4 providers. The likely target date for this process to be implemented will be for the start of 2022-23.

General

The system produces an online payment log which details the payments which have been paid either online by the student at enrolment (via the Pay360 web page) or via the CSDP portal.

The Head of Finance and Student Funding stated that the feedback which they have received from the students in relation to the payment portal has been positive. The Credit Control staff have asked students how their experience was of using the portal when they are contacting them to obtain payment from them. The College has not yet undertaken a full survey of the students to gauge their thoughts on the payment portal.

During our audit we were taken through the various steps in the portal by the Head of Finance and Student Funding. The Pay360 and CSDP web pages used had the same branding as the College's web pages, thus to the user it appears that they were still in the College's web page. The process followed the same steps for any online payment facility - thus it should be familiar and easy for the students to use.

From our review, on screen, of some of the payments made, we saw that this took as little as 2 minutes to complete. The time taken is obviously dependent on connectivity of the student's Wi-Fi, but generally this process does not take long to complete.

Work Undertaken

In line with each objective, we undertook the following:

- The College is complying with its Financial Regulations and the Financial Memorandum with the SFC in terms of the cash and treasury management arrangements.
 - We established and assessed the current cash and treasury management arrangements within the College.
 - We considered whether these were in line with the College's Financial Regulations and complied with the Financial Memorandum with the SFC. Where applicable we highlighted any areas of non-compliance.
- The cash management process is robust and fit for purpose, with an appropriate approval and reporting process in place to ensure the College has sufficient working capital to continue operating.
 - We discussed and established with relevant staff the process, approval and reporting of the monthly draw down from the SFC.
 - We considered the reporting to the Senior Management Team and the Board of Management/Committee to ensure this was robust and done on a frequent basis.
 - We also established what reporting to the SFC is required and ensured that this is being done in line with requirements and on a timely basis.
- There are appropriate cash and banking procedures in place which include the process for cash and bank reconciliations, and which are being followed by staff.
 - We obtained and assessed the College's cash and banking procedures to ensure that these are fit for purpose. Where applicable we highlighted any gaps in these procedures.
 - We ensured that the procedures cover all aspects of cash collection and banking within the College including cash and bank reconciliations.
 - We undertook sample testing on the following to confirm that staff were following the procedures in practice:
 - 10 BACS payments for student support funds (Bursary, EMA, FE Discretionary, HE Discretionary and Childcare);
 - 6 BACS payments for suppliers;
 - 3 months BACS payments for payroll;

- 6 cash advances payments; and
 - 15 Faster Payments and one-off BACs payments (**see Observation in respect of this**).
 - We also undertook sample testing on 6 months bank reconciliations to confirm these were being completed in line with procedures.
 - We discussed and established with key personnel the use of contactless payment utilised by the College and ensured that the controls around this are appropriate and operating as expected. We also discussed the payment portal with relevant staff to establish the process around this and the controls in place to reduce the risk of fraud and error.
 - We undertook testing on a sample of 7 student receipts made via the payment portal.
- There are appropriate levels of segregation of duties between the staff involved in the implementation, monitoring, and execution of treasury/cash management and with the delegated authorities.
- We reviewed the arrangements in place at the College to ensure there was appropriate segregation of duties. We ensured that those involved in the collection of cash are not those responsible for the recording and banking of cash. Compliance with the segregation of duties was tested as part of our testing noted above.
 - We reviewed the delegated authorities in place in the cash management area to ensure that these were appropriate and were operating in practice. Compliance with these authorities was tested as part of our testing noted above.

Conclusion

Overall conclusion

Overall Conclusion: Strong

We can provide a strong level of assurance over the College's cash management arrangements and can confirm these are in line with the College's Financial Regulations. We can also provide a strong level of assurance over the reporting arrangements in place to the Board of Management and the SFC. We can also confirm that there is appropriate delegated authorities and responsibilities within the area of cash management. We have raised no recommendations and 1 Observation. We have also highlighted 10 good practice points from our audit work.

Summary of recommendations

Grading of recommendations				
	High	Medium	Low	Total
Cash Management	0	0	0	0

As can be seen from the above table we have raised no recommendations from our audit work.

Areas of good practice

The following is a list of areas where the College is operating effectively and following good practice.

1.	The College's Financial Regulations contain a section on Cash Management. These are in line with what we would expect to find in terms of Cash Management.
2.	From our review of the College's Financial Regulations and current cash management arrangements we can confirm that these are complying with the requirements of the SFC's Financial Memorandum with Colleges.
3.	From our review we can confirm that the College is adhering to the process for the submission of the monthly draw down and cash flow to SFC.
4.	The College has procedures in place which detail the arrangements for the main cash management areas. From our review we found these to be robust and fit for the required purpose.
5.	The students have the option to pay for their tuition fees at the point of enrolment via the payment portal used by the College. From our review of this we found the process to be quick and straightforward to use.
6.	From our sample testing we can confirm that the BACs payments for suppliers, SSF, and payroll are being processed in line with the documented procedures.
7.	Bank reconciliations are undertaken for all bank accounts of the College.
8.	From our sample testing we can confirm that the payment portal is operating as envisaged.
9.	From our sample testing of 6 cash advances paid to employees from August and September 2021, we can confirm that these were being processed in line with the documented procedures. We also found that the cash advances were used for petty cash or other one-off payments (such as subscriptions), which is in line with the documented procedures.
10.	There is good segregation of duties within the Finance Team. There is also appropriate authorisation of the bank payments in place, with a 2-stage authorisation process required before the bank will accept and make the payment.

We include for your reference comparative benchmarking data of the number and ranking of recommendations made for audits of a similar nature in the most recently finished internal audit year.

Cash Management

Benchmarking				
	High	Medium	Low	Total
Average number of recommendations in similar audits	0	0	1	1
Number of recommendations at West College Scotland	0	0	0	0

From the table above it can be seen that the College has a lower number of recommendations compared to those colleges it has been benchmarked against.

The following is a list of observations from our review

1. From our testing of faster payments and ad hoc one-off BACs payments we found that the appropriate request form was not always completed and approved for these payments. In some cases, the request was made via an email from the requesting person. In all cases we are satisfied that the email request was for bona fide payments of the College, thus we have not raised a recommendation around this point. We would, however, suggest that the College reminds staff of the process to be followed and that its staff always adhere to this irrespective of the level of staff originating the request.

4 AUDIT ARRANGEMENTS

The table below details the actual dates for our fieldwork and the reporting on the audit area under review. The timescales set out below will enable us to present our final report at the next Audit Committee meeting.

Audit stage	Date
Fieldwork start	4 October 2021
Closing meeting	18 October 2021
Draft report issued	20 October 2021
Receipt of management responses	2 November 2021
Final report issued	4 November 2021
Audit Committee	1 December 2021
Number of audit days	5 days

5 KEY PERSONNEL

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

Wylie & Bisset LLP			
Partner	Graham Gillespie	Partner	graham.gillespie@wyliebisset.com
Senior Manager	Stephen Pringle	Senior Internal Audit Manager	stephen.pringle@wyliebisset.com
Supervisor	Audrey Cowan	Internal Audit Supervisor	audrey.cowan@wyliebisset.com
Auditor	Ben Conn	Internal Auditor	ben.conn@wyliebisset.com

West College Scotland			
Key Contacts	Vivienne Mulholland	Head of Finance	Vivienne.Mulholland@wcs.ac.uk
	Kirsty Hill	Principal Accountant	kirsty.hill@wcs.ac.uk
	Doreen Davidson	Treasury Assistant	doreen.davidson@wcs.ac.uk
	Karen Dunn	Treasury Assistant	karen.dunn@wcs.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

For each area of review, we assign a level of assurance in accordance with the following classification:

Assurance	Classification
Strong	Controls satisfactory, no major weaknesses found, no or only minor recommendations identified.
Substantial	Controls largely satisfactory although some weaknesses identified, recommendations for improvement made.
Weak	Controls unsatisfactory and major systems weaknesses identified that require to be addressed immediately.
No	No or very limited controls in place leaving the system open to significant error or abuse, recommendations made require to be implemented immediately.

A GRADING STRUCTURE

For each recommendation we assign a grading either as High, Medium, or Low priority depending on 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.

Purpose of review

We will undertake a review to provide assurance that the cash management practices as outlined in the Financial Regulations are suitable and have been adopted. We will also assess the reporting arrangements in place to the Board of Management and the Scottish Funding Council (SFC).

Our review will assess the implementation, monitoring, and execution of the treasury/cash management responsibilities along with the delegated authorities in this area.

This assignment forms part of our Annual Internal Audit Plan for 2021/22.

Scope of review

Our objectives for this review are to ensure:

- The College is complying with its Financial Memorandum and the Financial Memorandum with the SFC in terms of the cash and treasury management arrangements and the management of surplus funds.
- The cash management process is robust and fit for purpose, with an appropriate approval and reporting process in place to ensure the College has sufficient working capital to continue operating.
- There are appropriate cash and banking procedures in place which include the process for cash and bank reconciliations, and which are being followed by staff.
- There are appropriate levels of segregation of duties between the staff involved in the implementation, monitoring and execution of treasury/cash management and with the delegated authorities.

Limitation of scope

There are no limitations of scope.

Audit approach

Our approach to the review will be:

- Establishing and assessing the current cash and treasury management arrangements within the College. We shall consider whether these are in line with the College's Financial Regulations and comply with the Financial Memorandum with the SFC. We shall highlight any areas of non-compliance.
- Discussion with relevant staff to establish the process, approval and reporting of the monthly drawn down from the SFC.
- Considering the reporting to the Senior Management Team and the Board/Committee to ensure this is robust and done on a frequent basis. We shall also establish what reporting to the SFC is required and ensure that this is being done in line with requirements and on a timely basis.
- Obtaining and assessing the College's cash and banking procedures to ensure that these are fit for purpose. We shall highlight any gaps in these procedures. We will ensure that the procedures cover all aspects of cash collection and banking within the College including cash and bank reconciliations. We shall also ensure that staff are following these procedures in practice.
- Discussion with key personnel to establish the use of contactless payment utilised by the College and ensure that the controls around this are appropriate and operating as expected. We shall also discuss the payment portal with relevant staff to establish the process around this and the controls in place to reduce the risk of fraud and error.
- Reviewing the arrangements in place at the College to ensure there is appropriate segregation of duties. We shall ensure that those involved in the collection of cash are not those responsible for the recording and banking of cash.

- Review of the delegated authorities in place in the cash management area to ensure that these are appropriate and are operating in practice.

Potential key risks

The potential key risks associated with the area under review are:

- The College is not complying with the Financial Memorandum with the SFC in terms of its cash and treasury management arrangements and the management of surplus funds which could result in funding sanctions and/or being reduced by the SFC.
- The cash and treasury management process is not robust or fit for purpose, with an inappropriate approval and reporting process in place which could lead to inappropriate financial decisions being made and insufficient cash flow for the College.
- There are no or inadequate cash and banking procedures in place which do not include a procedure for cash and bank reconciliations. This could result in an inconsistent approach being taken by staff in terms of the cash and banking arrangements within the College.
- There are inappropriate levels of segregation of duties between the staff involved in the implementation, monitoring and execution of treasury/cash management which could reduce the effectiveness of the controls in place.

Meeting	Audit Committee
Date	1 December 2021
Location	MS Teams
Title of Paper	Internal Audit Report – review of Financial Regulations
Presented By	Stephen Pringle Wylie & Bisset
Recommendation to Members	Consideration
Appendix Attached	Yes 07(a) – Internal Audit Report – Review of Financial Regulations

PURPOSE

As part of the 2021-22 Internal Audit Plan, Wylie & Bisset conducted an internal audit to a review of the suitability of the College Financial Regulations to ensure that these comply with current guidance, such as the Scottish Public Finance Manual and the Financial Memorandum. The review considered the adequacy of the review and approval process of the Financial Regulations and compared these with best practice.

The paper is presented in line with West College Scotland Audit Committee Terms of Reference:

'To agree the Internal Audit Plan and review the Internal Audit Annual Report'

The paper is submitted *For Consideration*.

1. BACKGROUND

- 1.1 Wylie & Bisset, as the appointed internal auditors of the College, undertook a review of the suitability of the College Financial Regulations to ensure that these comply with current guidance, such as the Scottish Public Finance Manual and the Financial Memorandum.
- 1.2 The review considered the adequacy of the review and approval process of the Financial Regulations and compared these with best practice.
- 1.3 The assignment forms part of the 2021-22 Annual Internal Audit Plan.

2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 The scope of the review can be found on page 2 of Appendix A, and was agreed by the College prior to the commencement of the audit.
- 2.2 The overall audit report assurance level is STRONG with the conclusion being

'We can provide a strong level of assurance over the suitability of the College's Financial Regulations. We can confirm that the Financial Regulations comply with the requirements of the Scottish Public Finance Manual, the Scottish Funding Council's Financial Memorandum and are in line with CIPFA's Model Set of Financial Regulations for Academies, Colleges and Universities. We can also confirm that the College's Financial Regulations are generally comparable with the Financial Regulations of the 7 colleges we benchmarked the College against. We have raised no recommendations and 1 observation from our review. We have also highlighted 7 good practice points from our audit work.'

- 2.3 The report makes no recommendation and on page eight highlights seven areas of good practice.
- 2.4 One operational practice observation is made on page nine related to the content of the financial regulations. The College having recently amended the Financial Regulations would look to consider the aspects raised by the audits as part of the next annual review

Next Steps

- 2.5 The College Assurance Map will be updated to show the outcome of this audit work and the contents of the observation will be considered as part of the next review cycle.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications in this report.

4. STUDENT EXPERIENCE

- 4.1 There are no student experience implications associated with this paper.

5. HUMAN RESOURCES IMPLICATIONS

- 5.1 There are no human resources implications associated with this paper.

6. LEGAL IMPLICATIONS

- 6.1 There are no further legal implications in this paper to those listed above.

7. REPUTATIONAL IMPLICATIONS

- 7.1 There are no reputational implications associated with this paper.

8. COMMUNITY/PARTNERSHIP IMPACT

- 8.1 There are no community implications associated with this paper.

9. EQUALITIES IMPLICATIONS

- 9.1 There are no equality implications associated with this paper.

10. ENVIRONMENT IMPLICATIONS

- 10.1 There are no environmental implications associated with this paper.

RECOMMENDATION

The Audit Committee is requested to consider and note the contents of the report.

West College Scotland

Internal Audit 2021-22

Review of Financial Regulations
October 2021

Overall Conclusion

Strong

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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.

This report has been prepared solely for West College Scotland'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.

Overview

Purpose of review

We undertook a review of the suitability of the current Financial Regulations in place at the College to ensure that these comply with current guidance, such as the Scottish Public Finance Manual and the Financial Memorandum. Our review considered the adequacy of the review and approval process of the Financial Regulations and compared these with best practice.

This assignment forms part of our Annual Internal Audit Plan for 2021/22.

Scope of review

Our objectives for this review were to ensure:

- The College's Financial Regulations are robust, fit for purpose and kept under regular review.
- The College's Financial Regulations comply with the current guidance, such as the Scottish Public Financial Manual, the College's Financial Memorandum with the Scottish Funding Council and CIPFA's Model Set of Financial Regulations.
- The College's Financial Regulations comply with good practice from across the FE sector.

Limitation of scope

There were no limitations of scope.

Background Information

Financial Regulations

The College have a set of comprehensive [Financial Regulations](#), and supporting Policies and Procedures, which provides sufficient detail to ensure that the College's financial matters are managed in accordance with College policies and best practice. The College's Financial Regulations contain the following sections:

- Part A - General Provisions
 - Section 1 - Introduction
 - Section 2 - Financial Regulations - Status and Content
- Part B - Corporate Governance
 - Section 3 - The Board of Management
 - Section 4 - The Principal and Chief Executive
 - Section 5 - Committee Structure
 - Section 6 - Financial Responsibility of Staff
 - Section 7 - Risk Management
 - Section 8 - Whistleblowing
 - Section 9 - Code of Conduct
- Part C - Financial Management and Control
 - Section 10 - Financial Planning
 - Section 11 - Financial Control
 - Section 12 - Accounting Arrangements
 - Section 13 - Audit Requirements
 - Section 14 - Cash Management
 - Section 15 - Income
 - Section 16 - Other Income Generating Activities
 - Section 17 - Expenditure

- Section 18 - Petty Cash, Floats and Project Advances
- Section 19 - Checking Financial Transactions
- Section 20 - Pay Expenditure
- Section 21 - Assets
- Section 22 - Funds Held on Trust
- Section 23 - Other (insurance, student association, company, and joint ventures etc)
- Section 24 - Intellectual Property Rights and Patents
- Appendix 1 - The Seven Principles of Public Life
- Appendix 2 - Summary of Protocols for Proposed Projects
- Equality Impact Assessment

There is also a section on 'relevant documents and organisations'.

From our review we can confirm that the College's Financial Regulations and the financial arrangements within the College are compliant with the SFC's Financial Memorandum with the College.

The College is required to comply with the Scottish Government's Scottish Public Finance Manual (SPFM). From our review of the College's Financial Regulations, we can confirm that these include all sections which should be included to reflect compliance with the SPFM.

We can also confirm that the College's Financial Regulations include all sections which are included in the CIPFA Model Set of Financial Regulations for Academies, Colleges and Universities. From our discussion with the Director of Finance we were informed that the College used the CIPFA Model as a template for its Financial Regulations.

Financial Regulations Review Process

The College's process for reviewing the Financial Regulations is as follows:

- On an annual basis over the summer period, the various managers for Finance, Procurement, Student Funding and Principals Office will review the areas in the Financial Regulations to see if there have been any changes since the last review.
- Each of the managers will track any changes or updates they make to their part of the Financial Regulations.
- The updated Financial Regulations are reviewed by the Head of Finance & Student Funding and the Director of Finance.

The Financial Regulations are generally reviewed every year, however the College reviewed these in September 2021 to implement mainly the procurement changes brought about by Brexit. The next planned date for review is October 2022.

On a quarterly basis the Director of Finance and Head of Finance & Student Funding review the Scottish Government website for any updates to the [Scottish Public Finance Manual](#) (SPFM). If there is anything which will have a material/significant impact on the College's finances and financial arrangements, they will update the Financial Regulations to incorporate these changes. If there are any significant changes to the Financial Regulations, the updated Financial Regulations are taken to the Corporate Development Committee and then to the Board of Management for consideration and approval. If the changes are minor, the Director of Finance would discuss these amendments with the Chair of the Corporate Development Committee to see if the updated Financial Regulations would need to be taken to the Corporate Development Committee and the Board for approval. Minor changes would be changes to titles, etc. Major changes would be items which result in a complete change in process for the College or changes in legislation.

We are satisfied that the College has appropriate processes for reviewing their Financial Regulations to ensure that any significant/material changes in legislation/guidance are being identified and included in the Financial Regulations in a timely manner.

Comparison with Other Colleges

As part of our review, we compared the College's Financial Regulations with a sample of 7 other colleges' Financial Regulations. From this we found that the College's Financial Regulations were comparable with those in our sample. We found that all were detailed, most were around 70-pages long with the College's being 90-pages long.

From our review we found that there were some areas where the other colleges in our sample had slightly more detail than that of the College. We have not raised a recommendation in terms of these areas as we are of the opinion that the College's Financial Regulations are robust, fit for purpose and comply with the SPFM, Financial Memorandum and the CIPFA Model Set of Financial Regulations. However, we have included these areas in our Observation Section (see Section 2 to this report), should the College wish to consider these.

Work Undertaken

In line with each objective, we undertook the following:

- The College's Financial Regulations are robust, fit for purpose and kept under regular review.
 - We obtained and reviewed the College's Financial Regulations to ensure that these are robust and contain all sections we would expect to find in such a document.
 - We established how often the Regulations are reviewed and by whom. We assessed whether this is sufficient to ensure that the Financial Regulations are kept up to date with latest developments, guidance, and legislation.
- The College's Financial Regulations comply with the current guidance, such as the Scottish Public Financial Manual, the College's Financial Memorandum with the Scottish Funding Council and CIPFA's Model Set of Financial Regulations.
 - We compared the content of the College's Financial Regulations with the requirements of the Scottish Public Finance Manual, the Financial Memorandum with the Scottish Funding Council and CIPFA's Model Set of Financial Regulations.
 - From this we assessed whether the College's Financial Regulations are compliant or whether further work is required to make these compliant.
- The College's Financial Regulations comply with good practice from across the FE sector.
 - We benchmarked the content of the College's Financial Regulations against the content of the Financial Regulations from a sample of 7 of our other FE College clients.
 - Where applicable we highlighted any areas of omission or good practice not followed by the College. **See Observations section for further details from our testing.**

Conclusion

Overall conclusion

Overall Conclusion: Strong

We can provide a strong level of assurance over the suitability of the College's Financial Regulations. We can confirm that the Financial Regulations comply with the requirements of the Scottish Public Finance Manual, the Scottish Funding Council's Financial Memorandum and are in line with CIPFA's Model Set of Financial Regulations for Academies, Colleges and Universities. We can also confirm that the College's Financial Regulations are generally comparable with the Financial Regulations of the 7 colleges we benchmarked the College against. We have raised no recommendations and 1 observation from our review. We have also highlighted 7 good practice points from our audit work.

Summary of recommendations

Grading of recommendations

	High	Medium	Low	Total
Review of Financial Regulations	0	0	0	0

As can be seen from the above table there we have raised no recommendations from our audit work.

Areas of good practice

The following is a list of areas where the College is operating effectively and following good practice.

1.	The College has a robust set of Financial Regulations which provides guidance on the overarching principles of the financial processes in place within the College. The Financial Regulations are reviewed every year with the last review taking place in September 2021 and the next one due in October 2022. Once reviewed these are presented to the Corporate Development Committee (CDC) for consideration and then the Board of Management for final consideration and approval.
2.	On an annual basis the College reviews its Financial Regulations to ensure that these are still relevant and reflect the current practices, as well as good practice and current legislation. The College reviews its Financial Regulations on a quarterly basis against any updates received in respect of the SPFM. In this way the College ensures it is keeping up to date with the latest SPFM requirements.
3.	The College's staff are kept informed of the updates to the Financial Regulations via an all-staff announcement. The Financial Regulations are published on the staff intranet to which all staff have access.
4.	From our review of the College's Financial Regulations, we can confirm that these are in line with CIPFA's Model Set of Financial Regulations.
5.	The College's Financial Regulations are in line with the Scottish Funding Council's Financial Memorandum with the College.
6.	From our review we can confirm that the College's Financial Regulations are in line with the SPFM.
7.	The College's Financial Regulations compared well against the 7 colleges we benchmarked them against, with these containing similar sections as the Financial Regulations of these other colleges. See section 2 observations for some further comments around our testing.

The following is a list of observations from our review

1. From our comparison of the College's Financial Regulations with the Financial Regulations of 7 of our other college clients we found that these were largely comparable and contained similar information. We did find that for some of our English college clients they tended to include the following:
 - a more detailed description on their VAT arrangements;
 - more detail on how they protect their hardware, software and how they maintain their equipment and assets;
 - a more detailed explanation on their digital records; and
 - a glossary of terminology for their Financial Records.It should however be noted that the operational arrangements for areas such as VAT differ in English colleges due to their different legislative status.

We have not raised a formal recommendation for this as the College's Financial Regulations are in line with the CIPFA Model Set of Financial Regulations, the SPFM and the SFC's Financial Memorandum. However, we would be happy to discuss the above differences with the College should they wish to consider the above points when next reviewing their Financial Regulations.

3 AUDIT ARRANGEMENTS

The table below details the actual dates for our fieldwork and the reporting on the audit area under review. The timescales set out below will enable us to present our final report at the next Audit Committee meeting.

Audit stage	Date
Fieldwork start	4 October 2021
Closing meeting	19 October 2021
Draft report issued	20 October 2021
Receipt of management responses	25 October 2021
Final report issued	26 October 2021
Audit Committee	1 December 2021
Number of audit days	5 days

4 KEY PERSONNEL

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

Wylie & Bisset LLP			
Partner	Graham Gillespie	Partner	graham.gillespie@wyliebisset.com
Senior Manager	Stephen Pringle	Senior Internal Audit Manager	stephen.pringle@wyliebisset.com
Supervisor	Audrey Cowan	Internal Audit Supervisor	audrey.cowan@wyliebisset.com

West College Scotland			
Key Contacts	Alan Ritchie	Director of Finance	Alan.Ritchie@wcs.ac.uk
	Vivienne Mulholland	Head of Finance & Student Funding	Vivienne.Mulholland@wcs.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

For each area of review, we assign a level of assurance in accordance with the following classification:

Assurance	Classification
Strong	Controls satisfactory, no major weaknesses found, no or only minor recommendations identified.
Substantial	Controls largely satisfactory although some weaknesses identified, recommendations for improvement made.
Weak	Controls unsatisfactory and major systems weaknesses identified that require to be addressed immediately.
No	No or very limited controls in place leaving the system open to significant error or abuse, recommendations made require to be implemented immediately.

A GRADING STRUCTURE

For each recommendation we assign a grading either as High, Medium, or Low priority depending on 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.

Purpose of review

We will undertake a review of the suitability of the current Financial Regulations in place at the College to ensure that these comply with current guidance, such as the Scottish Public Finance Manual and the Financial Memorandum. Our review will consider the adequacy of the review and approval process of the Financial Regulations and compare these with best practice.

This assignment forms part of our Annual Internal Audit Plan for 2021/22.

Scope of review

Our objectives for this review are to ensure:

- The College's Financial Regulations are robust, fit for purpose and kept under regular review.
- The College's Financial Regulations comply with the current guidance, such as the Scottish Public Financial Manual, the College's Financial Memorandum with the Scottish Funding Council and CIPFA's Model Set of Financial Regulations.
- The College's Financial Regulations comply with good practice from across the FE sector.

Limitation of scope

There are no limitations of scope.

Audit approach

Our approach to the review will be:

- Obtaining and reviewing the College's Financial Regulations to ensure that these are robust and contain all sections we would expect to find in such a document. For any identified gaps we will provide recommendations for improvement.
- Establishing how often the Regulations are reviewed and by whom. We shall assess whether this is sufficient to ensure that the Financial

Regulations are kept up to date with latest developments, guidance, and legislation.

- We shall compare the content of the College's Financial Regulations with the requirements of the Scottish Public Finance Manual, the Financial Memorandum with the Scottish Funding Council and CIPFA's Model Set of Financial Regulations. From this we shall assess whether the College's Financial Regulations are compliant or whether further work is required to make these compliant. We shall highlight any gaps in compliance and provide recommendations for improvement as necessary.
- We shall obtain and review the Financial Regulations of a sample of our other FE College clients. We shall assess the content of the College's Financial Regulations against the content of the other colleges' documents. We shall highlight any areas of omission or good practice not followed by the College.

Potential key risks

The potential key risks associated with the area under review are:

- The College's Financial Regulations are not robust, fit for purpose nor kept under regular review leading to lack of control of the College's financial arrangements which could increase the risk of fraud or error.
- The College's Financial Regulations do not comply with current guidance and good practice which could lead to inadequate financial controls and inappropriate use of funding.
- The College's Financial Regulations do not follow good practice from across the FE Sector resulting in the College being out of step with other colleges and the potential for gaps in the financial controls of the College.

Meeting	Audit Committee
Date	1 December 2021
Location	MS Teams
Title of Paper	Internal Audit Annual Plan 2021-22
Presented By	Stephen Pringle Wylie & Bisset
Recommendation to Members	Consideration
Appendix Attached	Yes 08(a) – Internal Audit Annual Plan 2021-22

PURPOSE

The Audit Committee approved the 2021-22 College internal audit plan in May 2021. The attached report provides the Audit Committee with an update on 2021-22 planned internal audit activity for the year including:

- Agreed timings of the approved internal audit assignments.
- Dates that the Committee can expect to receive the internal audit reports.
- Agreed timings for the other audit work to be undertaken.

The paper is presented in line with West College Scotland Audit Committee Terms of Reference:

'To agree the Internal Audit Plan and review the Internal Audit Annual Report'
and

'To establish appropriate performance measures and indicators to monitor the effectiveness of the Internal Auditors 'To agree the Internal Audit Plan and review the Internal Audit Annual Report.'

The paper is submitted *For Consideration*.

1. BACKGROUND

- 1.1 The report at Appendix A provides the Audit Committee with an update on the 2021-22 Internal Audit Plan and the key performance indicators for the provision of the service.

2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 The phase 1 assignments have all now been undertaken and reported to the Committee, with planning for phase 2 assignments now in progress. No issues have arisen in the delivery of the 2021-22 plan.
- 2.2 The Internal Auditors are reporting that all performance indicators are progressing as intended.

Next Steps

- 2.3 The College will work with the Internal Auditors to deliver the phase 2 assignments as planned.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications in this report.

4. STUDENT EXPERIENCE

- 4.1 There are no student experience implications associated with this paper.

5. HUMAN RESOURCES IMPLICATIONS

- 5.1 There are no human resources implications associated with this paper.

6. LEGAL IMPLICATIONS

- 6.1 There are no further legal implications in this paper to those listed above.

7. REPUTATIONAL IMPLICATIONS

- 7.1 There are no reputational implications associated with this paper.

8. COMMUNITY/PARTNERSHIP IMPACT

8.1 There are no community implications associated with this paper.

9. EQUALITIES IMPLICATIONS

9.1 There are no equality implications associated with this paper.

10. ENVIRONMENT IMPLICATIONS

10.1 There are no environmental implications associated with this paper.

RECOMMENDATION

The Audit Committee is requested to consider and note the contents of the report.



West College Scotland

Internal Audit Plan

2021 - 2022

November 2021

2. Internal Audit Plan 2021/22

Assignment Plans

A detailed assignment plan will be prepared for each audit undertaken, setting out the scope and objectives of the work, allocating resources and establishing target dates for the completion of the work. Each assignment plan will be agreed and signed off by an appropriate sponsor from the College.

Key Dates

Phase	Audit Areas	Number of Days	Key College Personnel	Provisional Date for Visit	Date of Issue of Draft Report	Status	Provisional Date to the Audit Committee
Phase 1	Credits	8	Iain Foster-Smith	13 September 2021	1 October 2021	Completed	23 November 2021
	SSF	4	Vivienne Mulholland	20 September 2021			
	EMA	3	Vivienne Mulholland	September 2021			
Phase 2	Review of Financial Regulations	5	Alan Ritchie	4 October 2021	22 October 2021	Completed	1 December 2021
	Cash Management	5	Vivienne Mulholland	4 October 2021	22 October 2021	Completed	
Phase 3	Digital Strategy	6	Angela Pignatelli / Sara Rae	17 January 2022	4 February 2022		2 March 2022
	IT System Administration	5	Martin Joyce				
	Sustainability & Carbon Management	4	Alan Ritchie				
Phase 4	Estates Strategy	6	Martin Joyce Alan Ritchie Stephanie Graham	21 March 2022	8 April 2022		18 May 2022
	Review of Business Continuity	5					
	Planning	5					
	Student Recruitment	5					

Key Performance Indicators

Analysis of Performance Indicators

Performance Indicator	Target	Progress to date
Internal audit days completed in line with agreed timetable and days allocation	100%	100%
Draft scopes provided no later than 10 working days before the internal audit start date and final scopes no later than 5 working days before each start date	100%	100%
Draft reports issued within 15 working days of exit meeting	100%	100%
Management provide responses to draft reports within 10 working days of receipt of draft reports	100%	100%
Final reports issued within 5 working days of receipt of management responses	100%	100%
Recommendations accepted by management	100%	100%
Attendance at Audit Committee meetings by a senior member of staff	100%	100%
Annual Report to be issued by 31 August each year	100%	TBC
Suitably experienced staff used on all assignments	100%	TBC

Meeting	Audit Committee
Date	1 December 2021
Location	MS Teams
Title of Paper	Rolling Audit Action Plan
Presented By	Alan Ritchie, Director of Finance
Recommendation to Members	Approval
Appendix Attached	Yes 09(a) – Rolling Audit Action Plan

PURPOSE

The purpose of this report is to update the Audit Committee on the status of recommendations made by the College internal and external auditors.

The paper is presented in line with West College Scotland Audit Committee Terms of Reference:

'To review the Internal Audit reports, the management response to them and to review implementation of the actions required'

and

'To review the Rolling Audit Action Plan at each meeting'

The paper is submitted *To Approve*.

1. BACKGROUND

- 1.1 This report provides an update on the progress made by the College in addressing the recommendations arising from the work of both the internal and external auditors.
- 1.2 The report at Appendix A summarises the status of each of the recommendations and includes the latest management update.

2. FURTHER DETAIL ON THE REPORT TOPIC

Overall Position

- 2.1 The tables below summarise the movement in relation to the audit recommendations made since the September 2021 Audit Committee meeting:

Total Number of Recommendations	Internal Audit	External Audit	Total
Total brought forward recommendations	21	4	25
Added to the RAAP			
None	0	0	0
Follow Up Work			
Proposed for removal	(6)	0	(6)
Total remaining recommendations	15	4	19

Status of remaining recommendations	Internal Audit	External Audit	Total
<u>Partially Implemented</u> Not Yet Due	14	0	14
<u>Partially Implemented</u> Due for completion – extension requested	1	0	1
<u>Complete</u> Pending auditor review	0	4	4
Total	15	4	19

Internal Audit

Request to Remove Actions from the Plan

- 2.2 As noted in the table at 2.1, the College continues to address the outstanding internal audit recommendations with six actions, after review by the audit team, being considered as complete and therefore these can be removed from the Rolling Audit Action Plan:

- IA19-20(08) Date due 30/4/21
- IA19-20(10) 30/4/21
- IA20-21(01) 30/8/21
- IA20-21(07) 31/5/21
- IA20-21(12) 31/7/21
- IA20-21(15) 31/7/21

Extension Requested

- 2.3 An extension is being requested in relation to **IA20-21(22) External Communications - Content of the Public Facing Website**. The auditors recommended that the College ensured that the most up to date information is included on its public facing website as this is the area which potential students and the public will see first.
- 2.4 This work was intended to be completed by 31 October 2021 but due to resource and other priorities the work was delayed. The College external website provider has commenced the initial review work to allow the College to undertaken an effective review. This work will be completed by 31 December 2021 with an extension to the 31 January 2022 being requested to allow consideration of the initial review work.

Recommendation Status

- 2.5 Internal audit recommendations are graded by Wylie & Bisset as noted below:

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

2.6 The table below summarises the gradings of the outstanding recommendations with further comment being made:

Audit Grading	Low (3)	Medium (2)	High (1)
Internal Audit	9	11	1

2.7 The one High recommendation is *IA20-21(15) – Complaints Log – Accuracy of Complaints Log*. This recommendation has been actioned and is recommended for removal as per 2.2 above.

External Audit

2.8 The outcome of the External Audit year end work on Student Funding and Student Activity was considered as part of the 23 November 2021 Joint Audit and Corporate Development Committee.

2.9 The audit of 2020-21 Student Activity resulted in the following:

	Recommendation
B/fwd from 2019-20	4
<u>Recommended for removal</u> 1) Work Based Learning	(1)
<u>New Recommendations</u> 1) Fee Waiver (Medium) 2) Infill Students – Credit Count (Low)	2
Total c/fwd into 2021-22	5
Composed Of:	
<u>Partially Completed in 2020-21</u> 1) Student Attendance (Low) 2) Fee Waiver (Low) 3) Open/Distance Learning (Low)	3
<u>New Recommendations</u> 1) Fee Waiver (Medium) 2) Infill Students – Credit Count (Low)	2

2.10 The five recommendations are composed of four low and one medium recommendation, all of which the College has accepted and is taking action to address.

2.11 The Rolling Audit Action Plan will be updated to reflect the management actions required to be taken to address these recommendations.

- 2.12 The 2020-21 Student Funding audits resulted in one low level recommendation in relation to spot checks, with the auditor recommending that ‘...that the College produces a process to enable it to undertake the EMA spot checks remotely, until such times as all staff are back on site and the College is fully reopened.’
- 2.13 The College has accepted this recommendation and the action will be added to the Rolling Audit Action Plan.

Next Steps

- 2.14 The College will update the Rolling Audit Action Plan for the following:
- Removal of six internal audit recommendations.
 - One date extension.
 - Removal of one external audit recommendation.
 - Inclusion of three new recommendations resulting from the external audit work.
- 2.15 An updated report on the work undertaken to address the resulting recommendations will be presented to the next Committee meeting.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications in this report.

4. STUDENT EXPERIENCE

- 4.1 There are no student experience implications associated with this paper.

5. HUMAN RESOURCES IMPLICATIONS

- 5.1 There are no human resources implications associated with this paper.

6. LEGAL IMPLICATIONS

- 6.1 There are no further legal implications in this paper to those listed above.

7. REPUTATIONAL IMPLICATIONS

- 7.1 There are no reputational implications associated with this paper.

8. COMMUNITY/PARTNERSHIP IMPACT

8.1 There are no community implications associated with this paper.

9. EQUALITIES IMPLICATIONS

9.1 There are no equality implications associated with this paper.

10. ENVIRONMENT IMPLICATIONS

10.1 There are no environmental implications associated with this paper.

RECOMMENDATION

The Audit Committee is requested to:

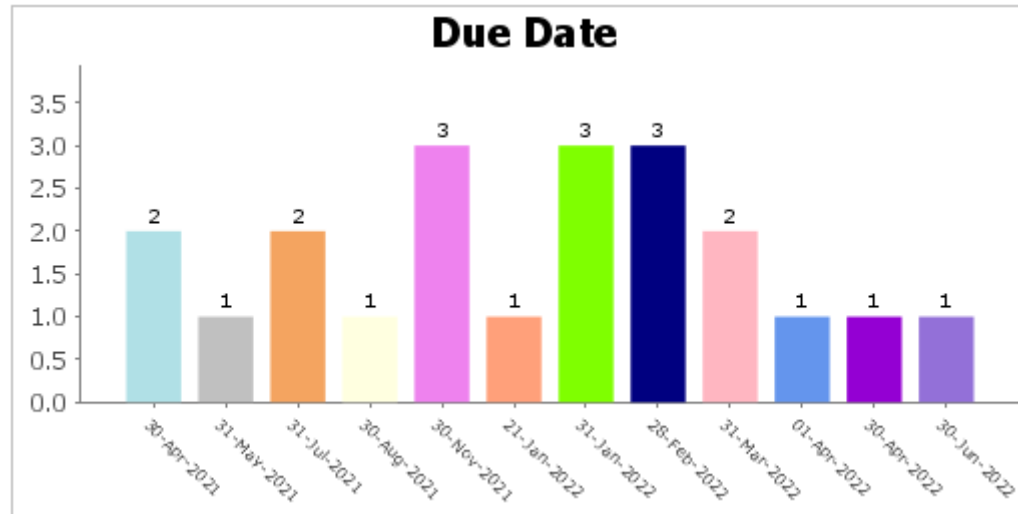
- Approve the removal of six internal audit recommendations.
- Approve the date extension of one recommendation.
- Note the addition of two new external audit actions.
- Consider and approve the updated Rolling Audit Action Plan.





Rolling Audit Action Plan

Progress Review Report


Internal Audit Recommendations Summary by Due Date



Due Date 30-Apr-2021


Audit Action	Audit Recommendation	Grading	Current Audit Status
IA19-20(08) Continuing Professional Development – Mandatory Induction Training on Moodle	We support the College’s approach to migrate Moodle data to the HR iTrent database to support the effective monitoring of mandatory training. The College must ensure they regularly monitor the completion of all mandatory training and send reminder emails to staff who fail to complete the training within the required timeframe. In addition, line managers should also be informed of staff who haven’t completed mandatory training and they should actively encourage staff to complete the training as soon as possible.	2	 Fully Implemented subject to audit confirmation
IA19-20(10) Continuing Professional Development – CPD and Induction training reports	The College should incorporate CPD Review and mandatory training completion data within the annual HR report. This will ensure transparency of the CPD and mandatory training processes with Board members and will provide an audit trail to demonstrate the progress the College has made towards improving these processes.	2	 Fully Implemented subject to audit confirmation


Due Date 31-May-2021

IA20-21(07) Assurance Mapping – Assurance Action Plans	We recommend that the College, once it has refined the assurance mapping process, ensures that there is a step for action plans to be produced, reviewed, implemented, and monitored. Potentially any actions being raised should be included on the relevant	3	 Fully Implemented subject to audit confirmation
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	department's operational plan to ensure that this is being monitored.			
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Due Date 31-Jul-2021




IA20-21(15) Complaints Log – Accuracy of Complaints Log	We recommend that the College ensure the data maintained on the register is accurate and appropriately reviewed.	1		Fully Implemented subject to audit confirmation
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IA20-21(12) Complaints Handling – Processing complaints in line with the College's procedures	We recommend that the College ensure that standard emails are provided to the complainant appropriately, even when issues are resolved over the phone. We also recommend that all correspondence should be directed to the individual in question unless expressed otherwise.	3		Fully Implemented subject to audit confirmation
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Due Date 30-Aug-2021

IA20-21(01) Fraud Awareness – Fraud Awareness Training	We recommend that the College considers running fraud awareness sessions for staff across the whole College. Refresher sessions should also be offered to the wider staff base on an annual basis, to ensure that all staff have an understanding of fraud, the latest scams and what to look out for in terms of identifying fraud.	3		Fully Implemented subject to audit confirmation
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Due Date 30-Nov-2021


<p>IA20-21(09) Complaints Handling – Responding to Complaints within appropriate timeframes</p>	<p>We recommend that the College ensure that complaints are completed in line with SPSO guidance. In events where an investigation may run over the 20 days, this should be communicated to the individual prior to due date. We also recommend that the Quality Team follow up with the complaint investigators more regularly in relation to the progress of their investigation which may in turn reduce the delays surrounding the processing of complaints.</p>	<p>2</p>		<p>Partially Implemented – Not Yet Due</p>
<p>IA20-21(10) Complaints Handling – Lesson Learned from Complaints</p>	<p>We recommend that the College ensure that lessons learnt are reviewed for all complaints even when complaint has not been upheld.</p>	<p>2</p>		<p>Partially Implemented – Not Yet Due</p>
<p>IA20-21(17) Complaints Handling – Student Feedback</p>	<p>We recommend that any amendments in the process are notified to students via posts on the website and/or the MyDay student portal. The College should also signpost the students to the Annual Complaints Handling reports via the Student Association’s social media and the MyDay student portal.</p>	<p>3</p>		<p>Partially Implemented – Not Yet Due</p>


Due Date 21-Jan-2022

IA20-21(11) Complaints Handling – Complaints Log	<p>We recommend that complaints when being initially logged are split into either stage 1 or stage 2 complaints. This should be notified to the person the complaint has been passed to for investigating to ensure that they are aware of the required timescales for resolution of the complaint.</p> <p>We would also recommend that the College's complaints log is updated to reflect the new SPSO guidance in respect of what should be included when recording complaints</p>	2		Partially Implemented – Not Yet Due
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Due Date 31-Jan-2022


IA20-21(13) Complaints Handling – Complaints Reporting	<p>We recommend that the College Senior Management Team should on a quarterly basis receive a report on complaints received and resolved along with the type of complaints and lessons learned. This will enable any recurring complaints to be addressed with learning points disseminated across the whole College.</p>	3		Partially Implemented – Not Yet Due
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IA20-21(14) Complaints Handling – Staff Wide Complaints Handling Training	We recommend that the College does provide training to all staff on the updated Complaints Handling Procedure to enable them to recognise what should be reported to the Quality Standards Co-ordinators as a complaint. Thereafter complaints handling refresher training should be provided to all staff, potentially utilising the standardised training resources through its Quality Networks, which should be available from August 2021	3		Partially Implemented – Not Yet Due
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IA20-21(22) External Communications – Content of the Public Facing Website	We recommend that the College ensures that the most up to date information is included on its public facing website as this is the area which potential students and the public will see first.	3		Partially Implemented – Not Yet Due
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Due Date 28-Feb-2022


IA20-21(19) External Communications – Student and Stakeholder Feedback	We recommend that the Marketing Department obtain feedback from students and other stakeholders to obtain their thoughts and comments on the current website. This could be done via surveys and/or focus groups but the College may wish to look at other sources of feedback as required. This should try to bring out what features they like and do not like in the current set up as well as the features they would like to see on the website.	2		Partially Implemented – Not Yet Due
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IA20-21(20) External Communications – Analysis of the Usage of the Website	We recommend that the Marketing Department on a periodic basis produce and review the analytical data available about website usage to ensure that any future developments of the website are reflective of the available data.	2		Partially Implemented – Not Yet Due
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IA20-21(18) External Communications – Marketing & Communications Strategy and Action Plan	We recommend that the College implement its intention to produce a Marketing & Communications Strategy and comprehensive action plan which should include the development of its website. As part of the production of the Strategy we recommend that the College consider setting up an internal working group to start considering the design and content of the website. The work of this group will then be augmented with the findings from the external consultant's review of the website. The action plan should also contain the findings from with the Accessibility Audit to ensure that the College are complying with Accessibility Regulations	3		Partially Implemented – Not Yet Due
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Due Date 31-Mar-2022

IA19-20(05) Continuing Professional Development – Alignment of Staff Training with the College's Strategic Objectives	The College should review the Annual Staff Development Programme planning process to ensure a comprehensive training plan is developed that is fully aligned with, and supports the achievement of, the College's strategic objectives. In addition, it would be good practice to align the ODHR Operational Plan and Annual Staff Development Training Programme timetables to ensure the plans are covering the same time periods, as doing so will allow the College to compare both plans before they are agreed to ensure there is no duplication and efficiencies are achieved where possible.	2		Partially Implemented – Not Yet Due
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IA19-20(06) Continuing Professional Development – Completion of CPD Review	The College should consider relaunching the CPDR process with staff being reminded that the completion of the process is a mandatory requirement, this will ensure the College has a clear understanding of individual staff skill gaps and training needs. In addition, the College must ensure the CPDR process is being fully applied when a staff member participate in the process, thus all	2		Partially Implemented – Not Yet Due
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	annual and interim reviews must be scheduled and completed. Management should also implement a quality assurance regime to ensure that all reviews take place in line with the CPDR procedure.		
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Due Date 01-Apr-2022

IA20-21(16) Complaints Handling – Complaints Handling Process Map	<p>We recommend that the College update their process map to include the following:</p> <ul style="list-style-type: none"> • Procedures to be followed for both stage 1 and stage 2 complaints. • Timeframes to be followed for each section of the process. <p>We also recommend that the College either integrate the reporting process and issuing of satisfaction surveys in a clearer format in their process map including everyone’s responsibilities or develop another process map that separately identifies these processes</p>	3	 Partially Implemented – Not Yet Due
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Due Date 30-Apr-2022



IA20-21(21) External Communications – Reporting to SMT	We recommend that on a periodic basis the Marketing Department report on the usage of the website together with the outcome of any feedback surveys and focus groups	2	 Partially Implemented – Not Yet Due
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Due Date 30-Jun-2022



<p>IA19-20(07) Continuing Professional Development – Alignment of CPDR development plans with corporate objectives and operational priorities</p>	<p>The College must ensure line managers are reminded of the importance of linking staff personal objectives with those of the wider College. Quality assurance checks should be completed by the College to ensure the process is being properly applied by staff and line managers.</p>	<p>2</p>	<p> Partially Implemented – Not Yet Due</p>
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Rolling Audit Action Plan - Progress Review Report by Revised Due Date



Internal Audit Action Plan 2019-20



Audit Action Code		Audit Action			
IA19-20(08)		Continuing Professional Development - Mandatory Induction Training on Moodle			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Organisational Development Manager; Head of Organisational Development and HR	2	30-Nov-2020	30-Apr-2021	Partially Implemented - Not Yet Due 	Fully Implemented subject to audit confirmation 
Audit Finding Description					
We support the College's approach to migrate Moodle data to the HR iTrent database to support the effective monitoring of mandatory training. The College must ensure they regularly monitor the completion of all mandatory training and send reminder emails to staff who fail to complete the training within the required timeframe. In addition, line managers should also be informed of staff who haven't completed mandatory training and they should actively encourage staff to complete the training as soon as possible.					
Audit Finding Risk					
If completion of mandatory induction training not appropriately monitored, there is a risk that staff will be unaware of the College's legal, regulatory and operational requirements. This could result in staff not complying with College policies and potentially laws and regulations, resulting in potential financial sanctions and reputational damage to the College.					
Audit Recommendation					
We support the College's approach to migrate Moodle data to the HR iTrent database to support the effective monitoring of mandatory training. The College must ensure they regularly monitor the completion of all mandatory training and send reminder emails to staff who fail to complete the training within the required timeframe. In addition, line managers should also be informed of staff who haven't completed mandatory training and they should actively encourage staff to complete the training as soon as possible.					
Management Update Note					
Enhanced MI reporting has been introduced through Power BI to allow the OD team to easily identify and report on who hasn't completed each mandatory learning module.					

This means that they can now contact individuals by email who haven't completed a certain module to remind them to do so, copying in their line manager. It also enables regular reporting to SMT. The OD team are now looking at how the alerts to staff and their managers can be automated, removing the need for manual intervention.

Audit Action Code		Audit Action			
IA19-20(10)		Continuing Professional Development – CPD and Induction training reports			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Organisational Development Manager; Head of Organisational Development and HR	2	30-Apr-2021	30-Apr-2021	Partially Implemented – Not Yet Due 	Fully Implemented subject to audit confirmation 
Audit Finding Description					
The College should incorporate CPD Review and mandatory training completion data within the annual HR report. This will ensure transparency of the CPD and mandatory training processes with Board members and will provide an audit trail to demonstrate the progress the College has made towards improving these processes.					
Audit Finding Risk					
The failure to include CPD Review and Staff Induction progress data within the Board of Management reports, increases the risk that the Board of Management are unaware of underperformance in these areas, resulting in the issues not being discussed and improvement actions being identified and agreed, leading to ineffective high level governance and the continuance of poor staff learning and development processes, ultimately leading to reputational damage.					
Audit Recommendation					
The College should incorporate CPD Review and mandatory training completion data within the annual HR report. This will ensure transparency of the CPD and mandatory training processes with Board members and will provide an audit trail to demonstrate the progress the College has made towards improving these processes.					
Management Update Note					
CPD Review and mandatory training completion data has be included within the draft Annual HR Report for 2020. This report will now be extended to cover a 19 month period (from January 2020 to July 2021) in order to align with the College's financial year in future years, so this data will be updated and included in the Annual HR Report (Jan 2020 to July 2021) which will be shared with Board members in August 2021.					



Audit Action Code		Audit Action			
IA19-20(05)		Continuing Professional Development – Alignment of Staff Training with the College's Strategic Objectives			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Organisational Development Manager; Head of Organisational Development and HR	2	31-Mar-2021	31-Mar-2022	Partially Implemented – Due for completion – extension requested 	Partially Implemented – Not Yet Due 
Audit Finding Description					
The College should review the Annual Staff Development Programme planning process to ensure a comprehensive training plan is developed that is fully aligned with, and supports the achievement of, the College's strategic objectives. In addition, it would be good practice to align the ODHR Operational Plan and Annual Staff Development Training Programme timetables to ensure the plans are covering the same time periods, as doing so will allow the College to compare both plans before they are agreed to ensure there is no duplication and efficiencies are achieved where possible.					
Audit Finding Risk					
There is a risk that the College's Corporate Strategy will not be achieved due to the College failing to assess and identify appropriate training and development areas that staff are required to undertake to provide them with the skills needed to support the achievement of the College's strategic objectives, ultimately impact the reputation of the College. In addition, failure to cross reference the College's two training programmes may result in duplicate training being provided to staff members, resulting in unnecessary resource and expenditure costs, which may impact the reputation of the College.					
Audit Recommendation					
The College should review the Annual Staff Development Programme planning process to ensure a comprehensive training plan is developed that is fully aligned with, and supports the achievement of, the College's strategic objectives. In addition, it would be good practice to align the ODHR Operational Plan and Annual Staff Development Training Programme timetables to ensure the plans are covering the same time periods, as doing so will allow the College to compare both plans before they are agreed to ensure there is no duplication and efficiencies are achieved where possible.					
Management Update Note					
Work underway. This can't be fully completed until new CPDR approach is in place. New OD Manager (starting 23rd August 21) will take lead on that project.					



Audit Action Code		Audit Action			
IA19-20(06)		Continuing Professional Development – Completion of CPD Review			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Organisational Development Manager; Head of Organisational Development and HR	2	31-Mar-2021	31-Mar-2022	Partially Implemented – Due for completion – extension requested 	Partially Implemented – Not Yet Due 
Audit Finding Description					
The College should consider relaunching the CPDR process with staff being reminded that the completion of the process is a mandatory requirement, this will ensure the College has a clear understanding of individual staff skill gaps and training needs. In addition, the College must ensure the CPDR process is being fully applied when a staff member participate in the process, thus all annual and interim reviews must be scheduled and completed. Management should also implement a quality assurance regime to ensure that all reviews take place in line with the CPDR procedure.					
Audit Finding Risk					
The absence of completing CPDR reviews, there is a risk that the College may not identify staff training needs, which may result in staff not having the required skills and knowledge needed to effectively deliver their roles. This could lead to poor staff performance which will ultimately impact the performance of the College.					
Audit Recommendation					
The College should consider relaunching the CPDR process with staff being reminded that the completion of the process is a mandatory requirement, this will ensure the College has a clear understanding of individual staff skill gaps and training needs. In addition, the College must ensure the CPDR process is being fully applied when a staff member participate in the process, thus all annual and interim reviews must be scheduled and completed. Management should also implement a quality assurance regime to ensure that all reviews take place in line with the CPDR procedure.					
Management Update Note					
We have recruited a new OD Manager who starts on 23rd August and will lead on this project as his key objective. This additional resource will provide the focus required to progress this further.					



Audit Action Code		Audit Action				
IA19-20(07)		Continuing Professional Development – Alignment of CPDR development plans with corporate objectives and operational priorities				
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status	
Organisational Development Manager; Head of Organisational Development and HR	2	31-Mar-2021	30-Jun-2022	Partially Implemented – Due for completion – extension requested 	Partially Implemented – Not Yet Due 	
Audit Finding Description						
The College must ensure line managers are reminded of the importance of linking staff personal objectives with those of the wider College. Quality assurance checks should be completed by the College to ensure the process is being properly applied by staff and line managers.						
Audit Finding Risk						
Failure to align CPDR plans with the College's strategic and operational priorities, increases the risk of the College agreeing and delivering training to staff that will not provide them with the skills and knowledge needed to support the College achieving its strategic objectives, ultimately resulting in the College's strategy failing and the reputation of the College being damaged.						
Audit Recommendation						
The College must ensure line managers are reminded of the importance of linking staff personal objectives with those of the wider College. Quality assurance checks should be completed by the College to ensure the process is being properly applied by staff and line managers.						
Management Update Note						
Work started on this. Once the revised CPDR process is launched the process will be clearer for all staff. Appropriate guidance, training and support will be provided as required.						



Internal Audit Action Plan 2020-21



Audit Action Code		Audit Action			
IA20-21(07)		Assurance Mapping – Assurance Action Plans			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Director of Finance	3	31-May-2021	31-May-2021	Partially Implemented – Not Yet Due ■	Fully Implemented subject to audit confirmation ■
Audit Finding Description					
We recommend that the College, once it has refined the assurance mapping process, ensures that there is a step for action plans to be produced, reviewed, implemented, and monitored. Potentially any actions being raised should be included on the relevant department's operational plan to ensure that this is being monitored.					
Audit Finding Risk					
There is a risk that actions to improve the assurance received are not implemented resulting in a lower level of assurance being provided.					
Audit Recommendation					
We recommend that the College, once it has refined the assurance mapping process, ensures that there is a step for action plans to be produced, reviewed, implemented, and monitored. Potentially any actions being raised should be included on the relevant department's operational plan to ensure that this is being monitored.					
Management Update Note					
The Audit Committee on 20 May 2021 considered the College Assurance Map (agenda item 18). The Committee reviewed the content of the Assurance Map and utilised it during its considerations of the internal audit plan for 2021-22 and beyond. The Assurance Map contains an action section to be updated following reviews carried out by either the SMT or Audit Committee.					



Audit Action Code		Audit Action			
IA20-21(12)		Complaints Handling – Processing complaints in line with the College's procedures			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Head of Sector Quality and Professional Standards	3	31-Jul-2021	31-Jul-2021	Not Yet Started 	Fully Implemented subject to audit confirmation 
Audit Finding Description					
We recommend that the College ensure that standard emails are provided to the complainant appropriately, even when issues are resolved over the phone. We also recommend that all correspondence should be directed to the individual in question unless expressed otherwise.					
Audit Finding Risk					
There is the risk that the College are not following the appropriate procedures when handling complaints.					
Audit Recommendation					
We recommend that the College ensure that standard emails are provided to the complainant appropriately, even when issues are resolved over the phone. We also recommend that all correspondence should be directed to the individual in question unless expressed otherwise.					
Management Update Note					
The College has ensured that all complainants are responded to as required by the College Complaints Handling Procedure including the use of a standard email. Responses are direct to the complainant and any others who are required to receive a response.					



Audit Action Code		Audit Action			
IA20-21(15)		Complaints Log – Accuracy of Complaints Log			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Head of Sector Quality and Professional Standards	1	31-Jul-2021	31-Jul-2021	Not Yet Started 	Fully Implemented subject to audit confirmation 
Audit Finding Description					
We recommend that the College ensure the data maintained on the register is accurate and appropriately reviewed.					
Audit Finding Risk					
There is the risk that the College are not accurately logging complaints data on their register.					
Audit Recommendation					
We recommend that the College ensure the data maintained on the register is accurate and appropriately reviewed.					
Management Update Note					
Staff members who are responsible for recording complaints will be reminded of the necessity for recording an accurate date of receipt.					



Audit Action Code		Audit Action			
IA20-21(01)		Fraud Awareness – Fraud Awareness Training			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Organisational Development Manager; Head of Sector Finance and Student Funding; Head of Organisational Development and HR	3	31-Mar-2021	30-Aug-2021	Partially Implemented – Due for completion – extension requested 	Fully Implemented subject to audit confirmation 
Audit Finding Description					
We recommend that the College considers running fraud awareness sessions for staff across the whole College. Refresher sessions should also be offered to the wider staff base on an annual basis, to ensure that all staff have an understanding of fraud, the latest scams and what to look out for in terms of identifying fraud.					
Audit Finding Risk					
There is a risk that due to lack of fraud awareness training, the College's staff may not be aware of what to look out for in respect of potential frauds.					
Audit Recommendation					
We recommend that the College considers running fraud awareness sessions for staff across the whole College. Refresher sessions should also be offered to the wider staff base on an annual basis, to ensure that all staff have an understanding of fraud, the latest scams and what to look out for in terms of identifying fraud.					
Management Update Note					
Customisation made to the learning and it has been published. Currently available for staff via the Moodle Staff Room. Will be communicated to staff by 16/08/21 to make them aware that it is there now that Teaching Staff have returned from the summer break.					



Audit Action Code		Audit Action			
IA20-21(09)		Complaints Handling – Responding to Complaints within appropriate timeframes			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Head of Sector Quality and Professional Standards	2	30-Nov-2021	30-Nov-2021	Not Yet Started 	Partially Implemented  – Not Yet Due
Audit Finding Description					
<p>We recommend that the College ensure that complaints are completed in line with SPSO guidance. In events where an investigation may run over the 20 days, this should be communicated to the individual prior to due date.</p> <p>We also recommend that the Quality Team follow up with the complaint investigators more regularly in relation to the progress of their investigation which may in turn reduce the delays surrounding the processing of complaints.</p>					
Audit Finding Risk					
<p>There is the risk that the College are not effectively processing complaints in line with SPSO guidance, are not communicating delays in a timely manner with complainants and have insufficient internal arrangements in place to ensure that investigations are completed in line with requirements.</p>					
Audit Recommendation					
<p>We recommend that the College ensure that complaints are completed in line with SPSO guidance. In events where an investigation may run over the 20 days, this should be communicated to the individual prior to due date.</p> <p>We also recommend that the Quality Team follow up with the complaint investigators more regularly in relation to the progress of their investigation which may in turn reduce the delays surrounding the processing of complaints.</p>					
Management Update Note					
<p>As operations return to on campus activity, the College will reinforce its operating procedure requiring that the Quality Team follow up with the complaint investigator prior to the 20-day deadline. A decision will then be made to either send a holding letter or that the complaint will be resolved, and an answer given by the 20-day deadline.</p> <p>The College is currently reviewing the software package from Pentana as an alternative electronic systems to the current Excel database. This work is ongoing and expected to be complete during the first quarter of 2021-22 to assist in implementing the new Complaints Handling Procedure.</p>					



Audit Action Code		Audit Action				
IA20-21(10)		Complaints Handling – Lesson Learned from Complaints				
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status	
Assistant Principal Performance and Skills	2	30-Nov-2021	30-Nov-2021	Not Yet Started 	Partially Implemented – Not Yet Due 	
Audit Finding Description						
We recommend that the College ensure that lessons learnt are reviewed for all complaints even when complaint has not been upheld.						
Audit Finding Risk						
There is the risk that the College are not utilising their complaints process to aid in improvement of the College operations.						
Audit Recommendation						
We recommend that the College ensure that lessons learnt are reviewed for all complaints even when complaint has not been upheld.						
Management Update Note						
The College continues to reinforce its operational procedures which include the requirement to ensure that any lessons to be learned from the complaint, irrespective of whether the complaint is upheld or not, are distributed to key stakeholders. It is intended that a lessons learned report will be shared with the SMT and departments after the end of October 2021 and then quarterly.						



Audit Action Code		Audit Action			
IA20-21(17)		Complaints Handling – Student Feedback			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Assistant Principal Performance and Skills	3	30-Nov-2021	30-Nov-2021	Not Yet Started 	Partially Implemented – Not Yet Due 
Audit Finding Description					
<p>We recommend that any amendments in the process are notified to students via posts on the website and/or the MyDay student portal. The College should also signpost the students to the Annual Complaints Handling reports via the Student Association’s social media and the MyDay student portal.</p>					
Audit Finding Risk					
<p>There is a risk that students and other stakeholders are not aware of the changes to the complaints handling process. There is also the risk that the College are not adequately gathering student feedback in line with expected practice.</p>					
Audit Recommendation					
<p>We recommend that any amendments in the process are notified to students via posts on the website and/or the MyDay student portal. The College should also signpost the students to the Annual Complaints Handling reports via the Student Association’s social media and the MyDay student portal.</p>					
Management Update Note					
<p>The College makes available details of its Complaints Handling Procedure on the website and the student induction checklist includes a section on how to complain. During the first quarter of 2021–22 to supplement the already available information an update will be made on the student portal ‘MyDay’ to ensure students are made aware of the recent changes. The College already attempts to gather the views of all complainers through a post complaint questionnaire.</p> <p>The College will annually signpost to students via social media and on MyDay as to the availability of the Annual Complaints Handling Report.</p>					



Audit Action Code		Audit Action			
IA20-21(11)		Complaints Handling – Complaints Log			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Head of Sector Quality and Professional Standards	2	21-Jan-2022	21-Jan-2022	Not Yet Started 	Partially Implemented – Not Yet Due 
Audit Finding Description					
<p>We recommend that complaints when being initially logged are split into either stage 1 or stage 2 complaints. This should be notified to the person the complaint has been passed to for investigating to ensure that they are aware of the required timescales for resolution of the complaint.</p> <p>We would also recommend that the College's complaints log is updated to reflect the new SPSO guidance in respect of what should be included when recording complaints</p>					
Audit Finding Risk					
<p>By recording complaints in this way, there is a risk that complaints which should be considered as Stage 1 complaints are being resolved after the 5- day timescale for such complaints and that this is going unnoticed due to the way these complaints are logged. As such the College's performance regarding complaints handling may be adversely impacted upon.</p>					
Audit Recommendation					
<p>We recommend that complaints when being initially logged are split into either stage 1 or stage 2 complaints. This should be notified to the person the complaint has been passed to for investigating to ensure that they are aware of the required timescales for resolution of the complaint.</p> <p>We would also recommend that the College's complaints log is updated to reflect the new SPSO guidance in respect of what should be included when recording complaints</p>					
Management Update Note					
<p>All complaints are classified at reporting stage as being either stage 1 or 2. The College is now highlighting on receipt whether a complaint will be dealt with as a Stage 1 or Stage 2 complaint as per the Complaint Handling Procedure (CHP) tracking and monitoring process. This modification has been included in update training on the CHP effective and shared with all relevant staff. This training will be ongoing throughout the first half of 2021 –22</p>					



Audit Action Code		Audit Action				
IA20-21(13)		Complaints Handling – Complaints Reporting				
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status	
Assistant Principal Performance and Skills	3	31-Jan-2022	31-Jan-2022	Not Yet Started 	Partially Implemented – Not Yet Due 	
Audit Finding Description						
We recommend that the College Senior Management Team should on a quarterly basis receive a report on complaints received and resolved along with the type of complaints and lessons learned. This will enable any recurring complaints to be addressed with learning points disseminated across the whole College.						
Audit Finding Risk						
There is risk that due to complaints figures, targets and trends not being reported to management on a regular basis poor performance may not be addressed due to management not being aware of the situation.						
Audit Recommendation						
We recommend that the College Senior Management Team should on a quarterly basis receive a report on complaints received and resolved along with the type of complaints and lessons learned. This will enable any recurring complaints to be addressed with learning points disseminated across the whole College.						
Management Update Note						
The Assistant Principal Performance and Skills will present a quarterly report to the Senior Management Team showing the level of complaints received by the College along with the significant lessons to be learned. The first SMT report will be delivered in November 2021 at the end of the first quarter and then quarterly after that.						



Audit Action Code		Audit Action			
IA20-21(14)		Complaints Handling – Staff Wide Complaints Handling Training			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Assistant Principal Performance and Skills	3	31-Jan-2022	31-Jan-2022	Not Yet Started 	Partially Implemented  – Not Yet Due
Audit Finding Description					
We recommend that the College does provide training to all staff on the updated Complaints Handling Procedure to enable them to recognise what should be reported to the Quality Standards Co-ordinators as a complaint. Thereafter complaints handling refresher training should be provided to all staff, potentially utilising the standardised training resources through its Quality Networks, which should be available from August 2021					
Audit Finding Risk					
There is the risk that the College's staff members are not aware of how to manage complaints. There is also the risk that the staff at the College are not aware of changes to complaints handling guidance.					
Audit Recommendation					
We recommend that the College does provide training to all staff on the updated Complaints Handling Procedure to enable them to recognise what should be reported to the Quality Standards Co-ordinators as a complaint. Thereafter complaints handling refresher training should be provided to all staff, potentially utilising the standardised training resources through its Quality Networks, which should be available from August 2021					
Management Update Note					
The College has started to implement the agreed 2021-22 training plan which will update all staff on the revised Complaints Handling Procedure (April 2021). Training is subject to other demands of the College including enrollment and the processing of results which has meant a slower start to the overall training than anticipated.					



Audit Action Code		Audit Action			
IA20-21(22)		External Communications – Content of the Public Facing Website			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Director Communications, Policy and Engagement	3	31-Oct-2021	31-Jan-2022	Not Yet Started 	Partially Implemented  – Not Yet Due
Audit Finding Description					
We recommend that the College ensures that the most up to date information is included on its public facing website as this is the area which potential students and the public will see first.					
Audit Finding Risk					
There is a risk that the College's public facing website is not presenting an accurate picture of the College and that those using the website are not basing any decisions on the most up to date information.					
Audit Recommendation					
We recommend that the College ensures that the most up to date information is included on its public facing website as this is the area which potential students and the public will see first.					
Management Update Note					
<p>A full editorial review of the West College Scotland website has been delayed owing to onboarding of a new Vice Principal: Operations and subsequent discussions/decisions around priorities, costs and approaches.</p> <p>This have now been settled 21/10/21 and the WCS external website provider/support is being tasked with delivering a full audit listing publication dates, subsequent updates, traffic numbers and last visits. The objective is to highlight a significant amount of content that can be retired allowing for a much more focused editorial review to be conducted by end Dec 21.</p>					

Audit Action Code		Audit Action			
IA20-21(18)		External Communications – Marketing & Communications Strategy and Action Plan			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Director Communications, Policy and Engagement	3	28-Feb-2022	28-Feb-2022	Not Yet Started 	Partially Implemented  – Not Yet Due
Audit Finding Description					
We recommend that the College implement its intention to produce a Marketing & Communications Strategy and comprehensive action plan which should include the development of its website. As part of the production of the Strategy we recommend that the College consider setting up an internal working group to start considering the design and content of the website. The work of this group will then be augmented with the findings from the external consultant's review of the website. The action plan should also contain the findings from with the Accessibility Audit to ensure that the College are complying with Accessibility Regulations					
Audit Finding Risk					
There is a risk that the College does not have a clear plan regarding its marketing and communications due to the lack of a comprehensive Strategy being in place. In addition, there is a risk that the College's website is not fit for purpose which may damage the College's reputation with potential students and stakeholders.					
Audit Recommendation					
We recommend that the College implement its intention to produce a Marketing & Communications Strategy and comprehensive action plan which should include the development of its website. As part of the production of the Strategy we recommend that the College consider setting up an internal working group to start considering the design and content of the website. The work of this group will then be augmented with the findings from the external consultant's review of the website. The action plan should also contain the findings from with the Accessibility Audit to ensure that the College are complying with Accessibility Regulations					
Management Update Note					
A first draft of the proposed Communications, Engagement and Marketing Strategy has been submitted to the Vice Principal: Operations on 22/10/21. Following any feedback it will go to final draft, then submission to SMT etc. Once approved it will provide the foundation for the Action Plan.					

Audit Action Code		Audit Action			
IA20-21(19)		External Communications – Student and Stakeholder Feedback			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Director Communications, Policy and Engagement	2	28-Feb-2022	28-Feb-2022	Not Yet Started 	Partially Implemented  – Not Yet Due
Audit Finding Description					
We recommend that the Marketing Department obtain feedback from students and other stakeholders to obtain their thoughts and comments on the current website. This could be done via surveys and/or focus groups but the College may wish to look at other sources of feedback as required. This should try to bring out what features they like and do not like in the current set up as well as the features they would like to see on the website.					
Audit Finding Risk					
There is a risk that if the College does not seek feedback from users of its website the College could miss opportunities to make improvements to its website.					
Audit Recommendation					
We recommend that the Marketing Department obtain feedback from students and other stakeholders to obtain their thoughts and comments on the current website. This could be done via surveys and/or focus groups but the College may wish to look at other sources of feedback as required. This should try to bring out what features they like and do not like in the current set up as well as the features they would like to see on the website.					
Management Update Note					
<p>Student Experience Survey (Oct 2021) – see attached. Summary: 96% found application process easy</p> <p>Application & Enrolment Report 21-22 Summary: 14.9% who failed to enrol did so based on 'Problems with College communications'.</p>					

Audit Action Code		Audit Action			
IA20-21(20)		External Communications – Analysis of the Usage of the Website			
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status
Director Communications, Policy and Engagement	2	28-Feb-2022	28-Feb-2022	Not Yet Started 	Partially Implemented – Not Yet Due 
Audit Finding Description					
We recommend that the Marketing Department on a periodic basis produce and review the analytical data available about website usage to ensure that any future developments of the website are reflective of the available data.					
Audit Finding Risk					
There is a risk that inappropriate decisions are taken on the development of the website due to the available analytical data not being used or monitored by the College's Marketing Department.					
Audit Recommendation					
We recommend that the Marketing Department on a periodic basis produce and review the analytical data available about website usage to ensure that any future developments of the website are reflective of the available data.					
Management Update Note					
Work is underway to bring access to, and the evaluation of, the current website analytical data in-house within the Communications and Marketing Team. Initially this will be the responsibility of the Director, Communications, Policy and Engagement. Monthly reviews will be conducted. Evaluative quarterly reports will be produced for the SMT/Executive team. The WCS website will also be reviewed annually with appropriate development/design and implementation costs worked into the annual budget allocation.					

Audit Action Code		Audit Action				
IA20-21(16)		Complaints Handling – Complaints Handling Process Map				
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status	
Assistant Principal Performance and Skills	3	01-Apr-2022	01-Apr-2022	Not Yet Started 	Partially Implemented – Not Yet Due 	
Audit Finding Description						
<p>We recommend that the College update their process map to include the following:</p> <ul style="list-style-type: none"> • Procedures to be followed for both stage 1 and stage 2 complaints. • Timeframes to be followed for each section of the process. <p>We also recommend that the College either integrate the reporting process and issuing of satisfaction surveys in a clearer format in their process map including everyone's responsibilities or develop another process map that separately identifies these processes</p>						
Audit Finding Risk						
There is the risk that the College's Process Map is not reflective of the Complaints Handling Procedure and outlines an alternative process.						
Audit Recommendation						
<p>We recommend that the College update their process map to include the following:</p> <ul style="list-style-type: none"> • Procedures to be followed for both stage 1 and stage 2 complaints. • Timeframes to be followed for each section of the process. <p>We also recommend that the College either integrate the reporting process and issuing of satisfaction surveys in a clearer format in their process map including everyone's responsibilities or develop another process map that separately identifies these processes</p>						
Management Update Note						
The updated College Complaints Handling Procedure (CHP) is based upon the SPSO Policy guidance and this has removed the need for the inclusion of a process map. The College Senior Management Team has approved the updated Procedure. The College will, as with all Policies and Procedures, take feedback from those who operate it and those who use it. This feedback will be collated over the 6 months to 31 January 2022 and subsequently used to inform any future update to the CHP.						

Audit Action Code		Audit Action				
IA20-21(21)		External Communications – Reporting to SMT				
Assigned To	Grading	Original Due Date	Revised Due Date	Previous Audit Status	Current Audit Status	
Director Communications, Policy and Engagement	2	30-Apr-2022	30-Apr-2022	Not Yet Started 	Partially Implemented – Not Yet Due 	
Audit Finding Description						
We recommend that on a periodic basis the Marketing Department report on the usage of the website together with the outcome of any feedback surveys and focus groups						
Audit Finding Risk						
There is a risk that inappropriate decisions are taken regarding the College's website due to the lack of appropriate analytical data reporting, feedback from students and other users of the website. There is also a risk that any gaps in compliance with the EU Accessibility Regulations go unnoticed which could expose the College to future legal challenge and claims of discrimination.						
Audit Recommendation						
We recommend that on a periodic basis the Marketing Department report on the usage of the website together with the outcome of any feedback surveys and focus groups						
Management Update Note						
Communications Directorate now has full access to the WCS website analytics (Oct 21). First monthly report to be issued end of Nov. It will also be accompanied by an overall 'snapshot' report/explainer detailing usage over last 4 years, audience, demographics etc. Annual report for 2021 will be issued end of Jan 22.						



[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
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[REDACTED]

Meeting	Audit Committee
Date	1 December 2021
Location	MS Teams
Title of Paper	Register of Interest for Board and Committee Members
Presented By	Shirley Gordon
Recommendation to Members	Consideration
Appendix Attached	YES 11(a) – Register of Interests

PURPOSE

The purpose of this report is to provide a summary of the Board of Management and committee members updated register of interests.

The paper is presented in line with West College Scotland Audit Committee Terms of Reference:

'To receive annual reports on Freedom of Information and Data Protection Acts requests; Register of Interests; and Hospitality/Gifts Registers.'

The paper is submitted *To Consider*.

1. BACKGROUND

- 1.1 Central to the proper conduct of the public business is the need for Board and Committee member to follow the seven principles of public life as set out by the Committee on Standards of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership (the Nolan Committee). Failure to do so may provide a risk to the reputation of the College or leave members of Board open to suspicion of impropriety in their conduct of business.
- 1.2 All members of Board of Management should ensure that they act impartially in accordance with the principles of public life. A register of interests is to be completed by all relevant persons. The purpose of the register is to provide information to the public about the interests of relevant persons which might influence their judgement, decision making and actions, or which might be perceived by a reasonable member of the public as doing so.
- 1.3 Good practice requires any member who has a material interest, either directly or through a partner, spouse or close relative (e.g. brother, sister, children etc.), in any College matter to declare that interest.
- 1.4 Attached at Appendix A is the current Board and Committee members register of interest as at October 2021.

Next Steps

- 1.5 The Audit Committee are requested to consider the content of the report and whether it requires any further assurances to be provided.

2. FINANCIAL IMPLICATIONS

- 2.1 There are no financial implications in this report.

3. STUDENT EXPERIENCE

- 3.1 There are no student experience implications associated with this paper.

4. HUMAN RESOURCES IMPLICATIONS

- 4.1 There are no human resources implications associated with this paper.

5. LEGAL IMPLICATIONS

5.1 There are no further legal implications in this paper to those listed above.

6. REPUTATIONAL IMPLICATIONS

6.1 There are no reputational implications associated with this paper.

7. COMMUNITY/PARTNERSHIP IMPACT

7.1 There are no community implications associated with this paper.

8. EQUALITIES IMPLICATIONS

8.1 There are no equality implications associated with this paper.

9. ENVIRONMENT IMPLICATIONS

9.1 There are no environmental implications associated with this paper.

RECOMMENDATION

The Audit Committee is requested to consider the content of the report and whether there are any further assurances required.

Board Member	Remunerated employment	Other remunerated positions	Non-remunerated positions	Related undertakings	Contracts	House, land & buildings	Shares & securities	Gifts & hospitality	Other relevant information
Paul Sefton	Students Association Vice President	None	None	None	None	None	None	None	None
Co-opted Committee Members									
David Mark	None	None	Director, Straps of Gourock Retail; Panel Member with Children's Hearings Scotland	None	None	None	None	None	None
Mark Hamilton	Student Engagement Officer, City of Glasgow College	None	Students Association UWS (SAUWS) Trustee	None	None	None	None	None	Non-active member of UNISON
Ruth Binks	Corporate Director of Education, Communities and Organisational Development, Inverclyde Council	None	None	None	None	None	None	None	None
Wai Chung Wong	Secretary to the Trustee of the Elementis Group Pension Scheme. 2.5 days a week as an independent, self-employed consultant.	Director of EGPS Trustees Limited, the corporate trustee of the Elementis Group Pension Scheme.	Treasurer, Fisherrow Yacht Club (SCIO - registered charity)	None	None	None	None	None	None

As at 4th October 2021

Meeting	Audit Committee
Date	1 December 2021
Location	MS Teams
Title of Paper	Audit Schedule of Business 2021-22
Presented By	Alan Ritchie
Recommendation to Members	Consideration
Appendix Attached	No

PURPOSE

The purpose of this report is to provide a summary of the work of the Audit Committee during 2021-22.

The paper is presented in line with West College Scotland Audit Committee Terms of Reference:

'To review its own effectiveness at least annually and to report the results of that review to the Board.'

The paper is submitted *To Consider*.

1. BACKGROUND

- 1.1 The role of the Audit Committee is to support the Board in its responsibilities of risk, control, and governance by reviewing the comprehensiveness of assurances in meeting the assurance needs of the Board, and by reviewing the reliability and integrity of these assurances through a process of constructive challenge.
- 1.2 This report provides a summary of the items which the Committee has considered during 2021-22 in fulfilling the above requirement.

Next Steps

- 1.3 The Audit Committee are requested to consider the content of the report and whether it requires any further assurances to be provided.

2. FINANCIAL IMPLICATIONS

- 2.1 There are no financial implications in this report.

3. STUDENT EXPERIENCE

- 3.1 There are no student experience implications associated with this paper.

4. HUMAN RESOURCES IMPLICATIONS

- 4.1 There are no human resources implications associated with this paper.

5. LEGAL IMPLICATIONS

- 5.1 There are no further legal implications in this paper to those listed above.

6. REPUTATIONAL IMPLICATIONS

- 6.1 There are no reputational implications associated with this paper.

7. COMMUNITY/PARTNERSHIP IMPACT

- 7.1 There are no community implications associated with this paper.

8. EQUALITIES IMPLICATIONS

- 8.1 There are no equality implications associated with this paper.

9. ENVIRONMENT IMPLICATIONS

- 9.1 There are no environmental implications associated with this paper.

RECOMMENDATION

The Audit Committee is requested to consider the content of the report and whether there are any further assurances required.

REMIT	DELIVERABLES				
	08-09-2021	23-11-2021 (Joint Meeting)	01-12-2021	2-03-2022	18-05-2022
1) General					
To provide advice to the Board on the strategic processes for risk, control and governance					
<ul style="list-style-type: none"> • Risk Management Strategy Update • Review of Strategic Risk Register • Corporate Governance Statement - Financial Statements • Internal audit reports (see section 2) • External audit report (see section 3) • Remit of Committee reviewed against best practice and governance requirements • Assurance Map Update 	Y	Y	Y	Y	
To review and advise the Board of the Internal Auditor's and External Auditor's assessment of the effectiveness of the College's financial and other internal control systems, including controls specifically designed to prevent or detect fraud or other irregularities as well as those for securing economy, efficiency, and effectiveness (value for money)					
<ul style="list-style-type: none"> • Internal Audit Annual Report 2020-21 • External Audit Management Letter as of 31 July • Internal and external audit reports as received • Update / Report on National Fraud Initiative (next review October 2022) • Report / Update on Value for Money • Procurement and Commercial Improvement Programme – every 2 years next due late 2022 • Anti-Fraud and Corruption Policy update (review date October 2021) • Anti-Bribery and Corruption Policy (review date July 2022) 	Y	Y Y	Y	Y	Y Y

Public

REMIT	DELIVERABLES				
	08-09-2021	23-11-2021 (Joint Meeting)	01-12-2021	2-03-2022	18-05-2022
To advise the Board on the adequacy of the whistle blowing process and to receive an annual report on any matters raised through this process					
<ul style="list-style-type: none"> Annual Report on Whistleblowing Committee to be made aware of any issues arising during the year (ongoing as required) 	Y				
To consider and advise the Board accordingly on any arrangements for special investigations and the outcomes of such investigations					
<ul style="list-style-type: none"> Reports to be received as requested (ongoing as required) 					
To advise the Board on its compliance with corporate governance requirements and good practice guidance, and in particular its compliance with the Financial Memorandum with SFC, the SPFM and the Code of Good Governance for Scotland's Colleges					
<ul style="list-style-type: none"> Review of Audit Committee effectiveness Internal Audit Annual Report 2020-21 External Audit management letter as of 31 July 2021 Report on compliance with SFC FM and SPFM Assurance Map Update 		Y Y		Y	Y
To consider the College's Annual Financial Statements at a joint meeting with the Finance and General Purposes Committee, and to recommend to the Board for approval					
<u>2020-21</u> <ul style="list-style-type: none"> External Audit Management Letter / Letter of representation Audit report on student activity Audit report on student funding activity Audit report on Educational Maintenance Allowances Governance Statement Financial Statements as of 31 July 2021 <u>2021-22</u> <ul style="list-style-type: none"> External Audit Engagement Strategy 2021-22 including audit fee 	Y	Y Y Y Y Y			Y

Public

REMIT	DELIVERABLES				
	08-09-2021	23-11-2021 (Joint Meeting)	01-12-2021	2-03-2022	18-05-2022
To provide an annual report to the Board, timed to support the finalisation of the accounts and the Statement on Internal Control, and summarising its conclusions from the work it has done during the year					
<ul style="list-style-type: none"> Annual report to Board of Management from the Audit Committee 	Y	Y			
To report to the Board after each meeting					
<ul style="list-style-type: none"> Minutes and verbal update to each Board Meeting Draft Committee Dates 2021-22 	Y Y	Y	Y	Y	Y Y
To review its own effectiveness at least annually and to report the results of that review to the Board					
<ul style="list-style-type: none"> Review of Committee remit Annual report to Board of Management from the Audit Committee Annual review of effectiveness of the Committee 	Y Y	Y			Y
2) Internal Audit					
To advise the Board on the selection, appointment or re-appointment and remuneration, or removal of the Internal Auditors. The responsibility for selection of the Internal Auditor may be delegated to a Selection Committee as agreed by the Audit Committee					
<ul style="list-style-type: none"> Review of effectiveness of internal audit function 				Y	Y
To advise the Board on the terms of reference for the Internal Auditors					
<ul style="list-style-type: none"> Internal Audit Plan Update 2021-22 Annual Internal Audit Plan 2022-23 			Y	Y	Y Y
To review the scope, efficiency and effectiveness of the work of the Internal Auditors and to advise the Board on these matters					
<ul style="list-style-type: none"> Annual Report to Board of Management from the Audit Committee Review of effectiveness of internal audit function 	Y	Y		Y	Y

REMIT	DELIVERABLES				
	08-09-2021	23-11-2021 (Joint Meeting)	01-12-2021	2-03-2022	18-05-2022
To agree the Internal Audit Plan and review the Internal Audit Annual Report					
<ul style="list-style-type: none"> Internal Audit Annual Report 2020-21 Internal Audit Update Report 2021-22 Assurance Map Update Draft Internal Audit Plan 2022-23 	Y	Y	Y	Y Y	Y Y
To review the Internal Audit reports, the management response to them and to review implementation of the actions required					
<u>2021-22</u> <ul style="list-style-type: none"> Review of Financial Regulations Cash Management IT System Administration Digital Strategy Review Sustainability & Carbon Management Estates Strategy Review Review of Business Continuity Planning Student Recruitment 			Y Y	Y Y Y	Y Y Y
To review the Rolling Audit Action Plan at each meeting					
<ul style="list-style-type: none"> Report on Rolling Audit Action Plan 	Y		Y	Y	Y
To encourage appropriate liaison and co-ordination between internal and external audit					
<ul style="list-style-type: none"> Invite / attendance at all Committee meeting by both internal and external auditors 	Y	Y	Y	Y	Y
To establish appropriate performance measures and indicators to monitor the effectiveness of the Internal Auditors					
<ul style="list-style-type: none"> Annual review of internal audit function Annual meeting with internal auditor excluding College staff 				Y	Y Y

Public

REMIT	DELIVERABLES				
	08-09-2021	23-11-2021 (Joint Meeting)	01-12-2021	2-03-2022	18-05-2022
3) External Audit					
To receive information on the general terms and conditions of appointment of the External Auditors who are engaged by Audit Scotland to provide audit services to the College					
<ul style="list-style-type: none"> Annual year end audit update by external auditors Annual external audit appointment terms and conditions Approval of External Auditors Audit Planning Memorandum 	Y				Y Y
To consider the External Auditors report on the Financial Statements and the management letter prior to submission to the Board, and to review the implementation of the recommendations					
<ul style="list-style-type: none"> External Auditors report on the Financial Statements 2020-21 		Y			
To review the Statement of Corporate Governance					
<ul style="list-style-type: none"> Review the statement of Corporate Governance 		Y			
To review the External Audit strategy and plan					
<ul style="list-style-type: none"> SFC Accounts Direction for Scotland's colleges External Audit 2021-22 Engagement Strategy 	Y				Y
To establish appropriate performance measures and indicators to monitor the effectiveness of the External Auditors;					
<ul style="list-style-type: none"> Annual review of effectiveness of external audit function Annual meeting with external auditor excluding College staff 		Y	Y		
To consider the objectives and scope of any non-statutory audit work to be undertaken by the External Auditors firm and advising the Board of any potential conflict of interests.					
<ul style="list-style-type: none"> As required 					

Public

REMIT	DELIVERABLES				
	08-09-2021	23-11-2021 (Joint Meeting)	01-12-2021	2-03-2022	18-05-2022
4) Risk					
To review the Risk Management Strategy and recommend to the Board for approval					
• Review of College Risk Management Strategy			Y		
To consider the Strategic Risk Register and to advise the Board accordingly					
• Review of Strategic Risk Register • Assurance Map	Y	Y		Y Y	Y
To consider matters of risk at each meeting and to satisfy itself that risks are being managed, including seeking assurances from internal and external audit on the adequacy of their management, and to report to the Board.					
• Review of Strategic Risk Register	Y	Y	Y	Y	Y
5) Other					
To receive annual reports on Freedom of Information and Data Protection Acts requests; Register of Interests; and Hospitality/Gifts Registers					
a. Freedom of Information and Data Protection Acts requests	Y				
b. Register of Interests			Y		
c. Hospitality / Gift Register	Y				
To request any member of the College staff to attend and/or to provide a written report on any matter that falls within the remit of the Committee					
• As required					
To procure ad-hoc specialist advice at the expense of the College as appropriate and when necessary, subject to budgets being agreed by the Board					
• As required					