

Title of Paper	Annual Return – Carbon Management
Presented by:	Nicola Connelly, Vice Principal of Operations
Recommendation:	To Note
Status:	PUBLIC
Linked To:	
KPI(s)	Under review will be shared in the Sustainability Action Plan
Strategic Objective	Sustainability
Strategic Risk	Financial Sustainability, Reputational Risk

Purpose / Executive Summary:

The attached paper 11.1 ‘PBCCD West College Scotland 2025 Report’ provides the details of the Colleges carbon emissions for the last academic year. This report was submitted to Government at the end of November 2025.

Recommendations:

The Committee is asked to **review** the content of this report.

Implications:	
Financial	There are no direct financial implications however to reach net zero there will require to be investment in “green technology”. Still to be fully costed.
Student Experience	There are no direct implications.
People	There are no direct implications.
Legal	There are no direct implications.
Reputational	If the College was not to pursue sustainability initiatives and not develop a plan to net zero there would be reputational issues relating to failing to comply with government legislation and meeting the net zero challenge.
Community/ Partnership impact	There are no direct implications.
Environment	There are direct implications for the environment in not taking better care of the value of the environment we rely on for our health and wellbeing and that of future generations.
Equalities	There are no direct implications.

Overview

1. This is our 10th year of completing the Public Bodies Climate Change Duties Report. We are pleased with the progress to date which sees around a 50% reduction in our CO2 emissions since our baseline year of 2015.
2. The key findings for the 2024/25 reporting year are:
 - The College participated in a peer review session organised by the Environmental Association for Universities and Colleges. It was noted that only 50% of colleges are reporting on Procurement emissions. This will be our 3rd year reporting on Procurement emissions.
 - We have reduced our gas consumption, which is our biggest emitter of CO2, by 19% in comparison to the previous year
 - Our electricity emissions are down 25% from the previous year, however, largely to do with the grid becoming greener.
 - Water consumption has increased by 18%, however previous figures were based on estimates. We plan to monitor water usage more closely along with gas and electricity.
 - Procurement emissions have increased by 10%, however, the emissions are calculated based on spend which has included larger estate projects this year.
3. Further to the progress above, we are working on developing an action plan to ensure we are meeting key sustainability priorities across the College and will share with the Committee.

Recommendation

The Committee is asked to **review** the content of this report.

Public Bodies Climate Change Duties Compliance Reporting Template 2025



1. Overview

This template is provided for public bodies required to report annually in accordance with the Climate Change (Duties of Public Bodies Reporting Requirements) (Scotland) Order 2015, as amended by the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Amendment Order 2020 which took effect for reporting periods commencing on or after 1 April 2021.

Reports must be submitted to ccreporting@ed.ac.uk by 30th November. Late submissions will not be accepted for analysis and may be deemed non-compliant with Public Bodies Duties reporting requirements.

2. Guidance

1. Please **do not delete any cells, rows or columns**. This may corrupt the template/data and compromise analysis. If you need more rows in any table please email the file to ccreporting@ed.ac.uk.
2. You can hide any extra rows within tables and freeze panes to keep the header/column rows visible when scrolling in a long or wide table.
3. Double-click on a text cell that you want to paste in to, single-clicking may bring up an error message.
4. Please complete the "Boundary info" tab. This will enable improved assessment of data coverage and inform SSN analysis.
5. The "Profile of Body" tab must be completed before proceeding to add any other data.
6. To ensure that the correct emission factors are applied please ensure that you are using the correct template for the reporting year type under Q1f. If your organisation reports according to the academic year, usually August to July, you must use the Academic Year template.
7. In Q3b emissions sources can be filtered by type in Column C. The list of available factors is visible on the Emission Factors tab. Please do not edit this list, use "other" if an EF is not available.
8. Only use the "other" rows when there is no relevant emission source available in the dropdown list or if you have bespoke data/emission factors. Please provide a brief explanation in the comment.
9. Water supply and treatment (sewage) emission factors are based on Scottish Water's carbon intensities for service supply. If you wish to use UK factors you need to enter manually in an "Other" row.

[10. More detailed guidance is available on the SSN website](#)

3. Colour Coding used in the template

	Dropdown box - select from list of options
	Uneditable/fixed entry cell
	Editable cell

Public Bodies Climate Change Duties Compliance Reporting Template 2025

Please answer all questions below with respect to the public body's reporting boundary for the reporting period.
The information is intended to improve data coverage and inform analysis, in particular, to help identify data gaps.

There are 3 response options:

YES - data is available and is reported

NO - there is no emission source or activity

? - the source/activity occurs, but it is not monitored, or no data is currently available

Any points of clarification can be added in the comments field for the corresponding emissions source(s) in Table 3b on the Emissions tab.

Emissions source/activity		Select from dropdown list
Owned estate	Are any buildings owned by the public body?	Yes
Natural gas	Is natural gas used to heat any of the owned estate	Yes
Other heating & fuels	Are other heating fuels used on any of the owned estate	No
Managed services	Are building services managed on behalf of another public body that shares or leases space?	No
Leased premises -public	Are building services managed and provided by another public body?	No
Leased premises - private	Are building services managed and provided by a private landlord?	No
Purchased heat and steam	Is heat or steam purchased to supply any of the owned estate	No
Fleet and equipment	Are any vehicles or fossil-fueled machinery or equipment owned or leased, excludes short-term or infrequent hires?	Yes
Refrigerants/F-gases	Are there any air conditioning or refrigeration systems that require refrigerant gas top-ups?	Yes
Medical gases	Are medical gases used?	No
Business travel - private	Do staff undertake business travel by private car?	Yes
Business travel - flights	Do staff undertake any business travel by plane?	Yes
Homeworking	Do any staff work from home - including hybrid?	Yes
Supply chain	Are any goods or services purchased?	Yes
Land use	Are more than 10 hectares of land owned or managed for public services provision, including for research or recreation?	No

PART 1 Profile of Reporting Body

1a Name of reporting body

Provide the name of the listed body (the "body") which prepared this report.

West College Scotland

1b Type of body

Select from the options below

Educational Institutions

1c Highest number of full-time equivalent staff in the body during the report year

728

1d Metrics used by the body

Specify the metrics that the body uses to assess its performance in relation to climate change and sustainability.

Metric	Units	Value	Comments
Floor area	m2	74,552.00	
Number of full-time equivalent students	number FTS	14,652.00	Full Time = 5044 Part Time 9608
Please select from drop down box			
Please select from drop down box			
Please select from drop down box			
Please select from drop down box			
Please select from drop down box			
Please select from drop down box			
Other (please specify in comments)			
Other (please specify in comments)			
Other (please specify in comments)			
Other (please specify in comments)			
Other (please specify in comments)			
Other (please specify in comments)			
Other (please specify in comments)			

1e Overall budget of the body

Specify approximate £/annum for the report year.

Budget

Budget Comments

£60,000,000

The financial situation remains challenging. The college has been provided with flat funding over the past two years which is essentially a decrease in funding due to inflationary pressures.

1f Report type

Please select the appropriate reporting period to ensure that the correct set of emissions factors is auto-populated in Q3b.

Reporting type

Report year comments

Academic

2024-25

1g Context

Provide a summary of the body's role and functions that are relevant to climate change reporting.

West College Scotland (WCS) was established under the Further and Higher Education (Scotland) Act 1992 with the purpose of delivering high-quality education. The College is committed to providing inspirational and innovative learning experiences that maximise opportunities for students to progress into employment, self-employment, or further study. Through excellent teaching and tailored support, WCS strives to empower learners and communities across the region.

As one of the largest colleges in Scotland, WCS serves more than 20,000 students across full-time, part-time, and online programmes. During 2024–25, the College employed 728 full-time equivalent staff and continues to play a leadership role in the West of Scotland. Working closely with partners and stakeholders, WCS is addressing the significant social and economic challenges that continue to affect many towns and communities in the region.

The College estate comprises a diverse range of buildings located in Clydebank, Greenock, and Paisley, constructed between the 1960s and 2010s. The recent estate condition survey identified that £42m of spend was required across the estate with £30m deemed high priority. However, with annual funding from the SFC was only £4 million of which £1.5m is for planned and reactive maintenance, the College has accumulated a backlog of

PART 2 Governance, Management and Strategy

Governance and management

2a How is climate change governed in the body?

Provide a summary of the roles performed by the body's governance bodies and members in relation to climate change. If any of the body's activities in relation to climate change sit outside its own governance arrangements (in relation to, for example, land use, adaptation, transport, business travel, waste, information and communication technology, procurement or behaviour change), identify these activities and the governance arrangements. Provide a diagram / chart to outline the governance structure within the body.

The College Sustainability Strategy was approved by the Board of Management in October 2022. The overall responsibility for the implementation of the Strategy rests with the Board of Management with in-depth monitoring being undertaken through the Corporate Development Committee of the Board of Management. Sustainability will be taken as a separate item on the agenda at each meeting of the Corporate Development Committee with the College Sustainability Officer reporting on progress against the Strategy Objectives. To assist in this process a Sustainability Oversight Group has been set up which is chaired by the Vice Principal of Operations. Membership of the Group has been drawn from staff, students, and unions and if necessary external support will be brought in from organisations such as Zero Waste Scotland, EAUc, the Scottish Funding Council.

Overall progress is reported annually with a report provided to the College's Corporate Development Committee. Robust energy, transport and waste data provides the College with the basis to monitor and report on the results of its action and it will help to drive behaviour change. Carbon data is recorded and analyses bi-annually. The College records and monitors building energy data along with fleet fuel, waste, and travel data. Carbon emission data is then compiled for the purposes of reporting progress.



2b How is climate change action managed and embedded in the body?

Provide a summary of how decision-making in relation to climate change action by the body is managed and how responsibility is allocated to the body's senior staff, departmental heads etc. If any such decision-making sits outside the body's own governance arrangements (in relation to, for example, land use, adaptation, transport, business travel, waste, information and communication technology, procurement or behaviour change), identify how this is managed and how responsibility is allocated outside the body. Provide a diagram to show how responsibility is allocated to the body's senior staff, departmental heads etc.

During 2024/25, the College has continued to strengthen its relationships with a range of strategic partners, including local community groups and the three local councils within the West region. These partnerships are central to embedding a strategic approach to sustainability and carbon management across the institution. The College remains committed to delivering the targets set in its Sustainability Strategy by reducing energy consumption and implementing a programme of carbon reduction initiatives.

Collaboration with key partners such as EAUc, Cycle Scotland, and Home Energy Scotland has been instrumental in shaping and supporting the College's work. These organisations have contributed to the development of specific carbon-saving and energy-reduction projects, the implementation of the Carbon Management Plan, and the provision of external verification to ensure activities are robust and credible. The purpose of these partnerships is to drive continuous improvement and embed sustainability as a core element of

Strategy

2c Does the body have specific climate change mitigation and adaptation objectives in its corporate plan or similar document?

Provide a brief summary of objectives if they exist.

Wording of objective	Name of document	Document Link
The Sustainability Strategy identifies our vision and commitment for making West College Scotland a more sustainable place to study and work. As part of the Scottish Colleges' Statement of Commitment on the Climate Emergency, West College Scotland has pledged to reach a net zero target by 2040, five years ahead of the Scottish Government target.	Sustainability Strategy	https://www.westcollegescotland.ac.uk/media/214961/sustainability-strategy-a4-141122.pdf
Sustainable Procurement - To embed sound ethical, social and environmental policies within the procurement function and to comply with relevant Scottish, UK and EC legislation in performance of the sustainable procurement duty. The College will treat all suppliers fairly, equally and without discrimination through making procurement transparent and accessible to all businesses especially Small and Medium Sized Enterprises (SMEs), the third sector and supported businesses.	Procurement Strategy	Available on request

2d Does the body have a climate change plan or strategy?

If yes, provide the name of any such document and details of where a copy of the document may be obtained or accessed.
Yes - see above. We are planning to review the Sustainability Strategy over the coming months to realign actions and to better monitor our energy and waste consumption and to put a Heating and Cooling policy in place.

2e Does the body have any plans or strategies covering the following areas that include climate change?

Provide the name of any such document and the timeframe covered.

Topic area	Name of document	Link	Time period covered	Comments
Adaptation				
Business travel	Travel and Subsistence Policy		Current	
Staff Travel	Travel and Subsistence Policy		Current	
Energy efficiency				
Fleet transport				
ICT	IT Strategy	Available on request	2020-2025	
Renewable energy	Estate Strategy	See above 2c	2016-2025	
Sustainable/renewable heat	Estate Strategy		2016-2025	
Waste management	Estate Strategy		2016-2025	
Water and sewerage	Estate Strategy		2016-2025	
Land Use	Estate Strategy		2016-2025	
Other (please specify in comments)				
Please select from drop down box.				

2f What are the body's top 5 priorities for climate change governance, management and strategy for the year ahead?

Provide a brief summary of the body's areas and activities of focus for the year ahead.

- 1) Introduce a heating and cooling policy to reduce usage.
- 2) Review of estate footprint with aim being to reduce space to what is needed.
- 3) Embed the work of Sustainability Oversight Group within the College.
- 4) Development and embedding of links to external bodies to further progress achievement of the College Sustainability Strategy objectives.
- 5) Review and monitor waste usage to increase recycling rates.

2g Has the body used the Climate Change Assessment Tool (a) or equivalent tool to self-assess its capability / performance?

If yes, please provide details of the key findings and resultant action taken.

(a) This refers to the tool developed by Resource Efficient Scotland for self-assessing an organisation's capability / performance in relation to climate change.
No, but we aim to start looking at this over the coming year.

Further information

2h Supporting information and best practice

Provide any other relevant supporting information and any examples of best practice by the body in relation to governance, management and strategy.

The College has established several links with a number of organisations to look at positive ways in which these organisations can assist in reducing the College carbon emissions/embedding of sustainability topic. Those organisations include working:
a) Working in partnership with the College Student Association on joint initiatives college wide such as the removal of plastic cups from water machines and the aim to reduce plastics within catering services.
b) Working with neighbouring colleges and universities to share best practice on key objectives such as reducing energy consumption, water, waste and travel.
c) Working with waste provider, Enva, on delivering workshops to better educate our staff and students on waste.
d) In partnership with Home Energy Scotland to promote the benefits to staff and students of saving energy and greener living, with workshops embedded in our CPD training and information stands to educate both staff and students.
e) With energy training providers such as Business Stream to become more proficient and proactive in monitoring and reducing our carbon emissions and costs.
f) In partnership with local councils to stay connected and be involved with environmental projects.
g) In partnership with local volunteering group and our digital media students to create posters to be displayed within public toilets throughout the region to promote plastic free menstrual products.

The College is a member of the following:

- a) Environmental Association for Universities and Colleges (EAUc) which provides links to peers and useful organisations.
- b) The Waste Management Topic Support Network.
- c) Travel and Transport Topic Support Network.
- d) Smaller Institutes Working Group. Working with key strategic partners to look at options to improve our carbon footprint such as implementing projects, staff and student engagement, encourage behaviour change.

PART 4 Adaptation – please do not include information in this part on measures that solely reduce emissions with no implications for climate adaptation. These are climate mitigation measures which should be reported in the Emissions tab.

Assessing and managing risk

4a Has the body assessed current and future climate-related risks?
 If yes, provide a reference or link to any such risk assessments. Please report assessments of current risk separate from future risk assessments, where feasible.

The College has undertaken initial work to assess the risks associated with extreme weather and flooding. While no specific flooding risks have been identified to date, high rainfall events have occasionally required short-term property maintenance interventions. Local infrastructure surrounding the College has continued to perform effectively, and at present there is considered to be no significant risk of flooding across any of the College campuses.

Looking ahead, the College plans to carry out further investigation over the next year by completing the Climate Risk Assessment tool. This will ensure that potential vulnerabilities in other areas are fully considered and that the College remains proactive in managing climate-related risks.

4b What arrangements does the body have in place to manage climate-related risks?
 Provide details of any climate change adaptation strategies, action plans and risk management procedures, and any climate change adaptation policies which apply across the body.

The College has undertaken an assessment of flooding risks at its Waterfront (Greenock) and Paisley campuses, following advice from its insurance company's building surveyor. The report confirmed that there is no significant risk identified and no immediate action required.

To ensure resilience, the College has established plans and procedures to keep staff and students informed of any changes to operational status. These arrangements are designed to maintain services and ensure campuses remain open wherever possible. They form part of the College's wider Business Continuity Planning framework, which addresses extreme weather events and the broader impacts of climate change on staff and students.

A robust risk management process is already in place. In addition, the College has completed the Adaptation Scotland Checklist (copy attached), which will be reviewed annually by the Sustainability Oversight Group to ensure ongoing consideration of climate related risks and continuous improvement in preparedness.

Taking action

4c What action has the body taken to adapt to climate change?
 Include details of work to increase awareness of the need to adapt to climate change and build the capacity of staff and stakeholders to assess risk and implement action. The body may wish to make reference to the Scottish Climate Change Adaptation Programme ("the Programme").

The College has established a Sustainability Oversight Group with representation from both staff and students. The Group's role is to promote the wider sustainability agenda while also considering specific projects and actions that the College should undertake in response to the climate emergency.

Sustainability is embedded within the curriculum, with students encouraged to engage in sustainability-focused initiatives through their courses and enterprise activities. Environmental criteria are applied, where appropriate, in the tendering of external contracts, and the College works closely with suppliers to ensure future sustainability requirements are met.

The College is actively represented within all three local authorities in its region, primarily through Community Planning Partnerships and also at committee level within the councils. The approved Sustainability Strategy seeks to strengthen these external linkages, ensuring collaboration and alignment with wider regional priorities.

Looking ahead, each teaching and support department will be expected to develop a sustainability statement as part of its operational planning. This will ensure that sustainability is consistently embedded across the College and integrated into the curriculum wherever possible.

4d Where applicable, what contribution has the body made to helping deliver the Programme?
 Provide any other relevant supporting information

As above.

Review, monitoring and evaluation

4e What arrangements does the body have in place to review current and future climate risks?
 Provide details of arrangements to review current and future climate risks, for example, what timescales are in place to review the climate change risk assessments referred to in Question 4(a) and adaptation strategies, action plans, procedures and policies in Question 4(b).

The College is an active member of the Environmental Association of Universities and Colleges (EAUC), with staff regularly attending conferences and workshops to remain informed of the latest advice and guidance. Emerging sustainability issues are reviewed by the Sustainability Oversight Group, while matters with wider resource implications are escalated to the Corporate Development Committee of the Board of Management for consideration.

In addition, SEPA announcements are closely monitored, and estates teams across all campuses are registered with the SEPA alert system. This ensures that the College is kept up to date with relevant environmental information and can respond promptly to any developments.

4f What arrangements does the body have in place to monitor and evaluate the impact of the adaptation actions?
 Please provide details of monitoring and evaluation criteria and adaptation indicators used to assess the effectiveness of actions detailed under Question 4(c) and Question 4(d).

Feedback on awareness will be provided to the Sustainability Oversight Group. The College is not listed as a deliverer under SCCAP.

Future priorities for adaptation

4g What are the body's top 5 climate change adaptation priorities for the year ahead?
 Provide a summary of the areas and activities of focus for the year ahead.

Implementation of the October 2022 Sustainability Strategy and the associated five objectives.

Further information

4h Supporting information and best practice
 Provide any other relevant supporting information and any examples of best practice by the body in relation to adaption.

The College has already embedded sustainability within the curriculum, with students actively engaging in sustainability-focused initiatives through their courses and enterprise activities. Environmental criteria are already applied in tendering processes, and the College works closely with suppliers to meet evolving sustainability requirements. Staff from across the college are represented on the Sustainability Oversight Group, which is now established and meeting regularly to highlight the wider sustainability agenda and oversee specific projects.

The College is also actively represented within all three local authorities, both through Community Planning Partnerships and at council committee level, strengthening collaboration and influence across the region. In addition, staff members regularly attend EAUC conferences and workshops, ensuring the College remains up to date with current advice and guidance. SEPA announcements are monitored routinely, with estates teams across all campuses signed up to the SEPA alert system to provide timely responses to environmental risks.

PART 5 Procurement

5a How have procurement policies contributed to compliance with climate change duties?

Provide information relating to how the procurement policies of the body have contributed to its compliance with climate change duties.

A commitment has been made in the Colleges Procurement Strategy (2025-2030) to comply with the statutory Sustainable Procurement Duty which was introduced by the Procurement Reform (Scotland) Act 2014.

The Procurement Strategy 2025-2030 includes key measurements and targets which will be reported on annually (please see link)

The following measures are embedded within the procurement process to reduce carbon emissions associated with the purchase of goods, services and works;

A Contract Strategy is being completed for all procurements over £50,000 which covers analysis of the following to be included in the tender documentation.;

- Requests for information on bidder's environmental policies (including emissions, water etc)
- Bidders Climate Change Plan template included for completion
- Technical (scored or for information only depending on the contract value) method statement question detailing bidders' commitment to sustainability and the steps they take to minimise the impact to the environment.

The above is all on a proportionate and relative basis.

It is anticipated that by consolidating orders and setting a minimum order value that the College will reduce the number of emissions due to transport costs. Minimum orders have been set across our highest frequency suppliers.

5b How has procurement activity contributed to compliance with climate change duties?

Provide information relating to how procurement activity by the body has contributed to its compliance with climate change duties.

The Procurement Team, through the implementation of the College Procurement Strategy 2025-2030 are fully aware of the requirement placed upon the organisation regarding climate change.

The use of National Category A contracts ensures that the College is purchasing such items as Utilities from agreements which comply with climate change duties. Where possible, the College uses Category B (sector specific) framework collaborative agreements which are implemented by the sectorial Procurement Centre of Excellence (APUC) and Scotland Excel (SXL). Using such contracts, the College can be assured that where possible, the purchase of goods, services and works through these contracts puts climate change issues at the heart of the procurement process.

The College controls the remaining contracts (Category C – Local non-collaborative contracts). Contract Strategies are completed for all contracts over £50,000 in value. The analysis covered in the Contract Strategies also includes;

- Demand management analysis
- Buy/lease considerations
- Open Tender vs Mini-competition analysis (to maximise opportunities for local businesses submitting bids)
- Recycling opportunity consideration/reduction in waste/packaging where possible
- Completion of sustainability tests including life cycle impact mapping where required
- Life cycle impact mapping

At Contract and Supplier meetings, sustainability is included as a standard agenda item whereby sustainable practices are reviewed regularly; e.g. in a Hair and Beauty supplier contract, the supplier is providing shampoo and conditioner in refillable bottles.

Further information

5c Supporting information and best practice

Provide any other relevant supporting information and any examples of best practice by the body in relation to procurement.

The College requires all suppliers to sign up to APUC's Sustain Supply Chain Code of Conduct and where relevant, the Electronics Watch Code.

We are committed to conducting procurement activities in an environmentally, socially, ethically, and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to its vision. To demonstrate this commitment, current and potential suppliers are asked to acknowledge their compliance with the principles of the Sustain Supply Chain Code of Conduct with respect to their organisation and their supply chain.

The Procurement Team will be working with the College's suppliers to carry out individual organisational Sustainability Assessments on the EcoVadis eLearning platform. This tool gives organisations guidance to tackle priority improvement areas across Environment, Labour, Human Rights, Ethics and Sustainable Procurement practices.

Procurement staff have access to the following training and resources;

- Scottish Government training on Climate Literacy to help procurers understand the Climate Emergency challenge, and to appreciate how procurement activity can support net-zero aims for the organisation
- Sustainability Test
- Life Cycle Impact Mapping
- Scottish Public Procurement Prioritisation Tools
- APUC Responsible Procurement's library of documents and best practice examples on Sustainability and Responsible procurement
- Support from the Head of Responsible Procurement at APUC where required

The College's spend across Category A and B Framework Agreements is at 37%. These Framework Agreements contain many benefits relating to suppliers' commitments to sustainable practices including ensuring products and services with lower GHG emission options are procured.

Sustainability Training modules will be created with the aim of rolling out to relevant College users from early 2026.

Procurement aim for the FNT2030 forms to be completed/updated by Spring 2026.

The College anticipate procuring a new lighting system in 2025 and will be working with the Lighting Consultant to ensure lighting provided is as sustainable (e.g. using energy saving LEDs etc) as possible. The College's Sustainability Officer, along with Estates staff will be included in contract strategy discussions to ensure this is embedded.

Public Sector Report on Compliance with Climate Change Duties 2025 Template

PART 6 Validation and Declaration

6a Internal validation process

Briefly describe the body's internal validation process, if any, of the data or information contained within this report.

Data input is undertaken by the Sustainability Officer based upon externally provided third party data. This is then verified by the Director of Finance. A report on the annual return is made to the Corporate Development Committee and in future years this will be reviewed by the Sustainability Oversight Group.

6b Peer validation process

Briefly describe the body's peer validation process, if any, of the data or information contained within this report.

The College has for several years participated in the EAUC organised peer review process with the 2024-25 report being reviewed on the 6th of November.

6c External validation process

Briefly describe the body's external validation process, if any, of the data or information contained within this report.

The College does not participate in an external validation process.

6d No Validation Process

If any information provided in this report has not been validated, identify the information in question and explain why it has not been validated.

6e Declaration

I confirm that the information in this report is accurate and provides a fair representation of the body's performance in relation to climate change.

Name:	Nicola Connelly
Role in the body:	Interim Vice Principal Of Operations
Date:	26/11/2025

Date in format (dd/mm/yyyy)

Title of Paper	Policies
Presented by:	Senior Leadership Team
Action:	For Review (Approval at ARC/Board)
Status:	PUBLIC once approved
Linked To:	Organisational Governance
KPI(s)	n/a
Strategic Theme	All
Strategic Enabler	All
Risk Category	Finance / Staff / Students / Reputation / Infrastructure / Regulatory

Purpose / Executive Summary:

Four key policies have been reviewed and updated and are attached. These are:

- Records Management Policy (required under the Public Records (Scotland) Act 2011)
- Data Protection Policy (necessary for UK GDPR & Data Protection Act 2018 accountability requirements)
- Business Continuity Policy
- Business Continuity Plan

Recommendations:

The Corporate Development Committee are requested to consider the content of the policies to be submitted to Audit & Risk Committee for approval.

Implications:	
Financial	There are no direct financial implications associated with these policies.
Student Experience	There are no direct student experience implications associated with these policies.
People	There are no significant people implications associated with these policies.
Legal	Policies are designed to adhere to current legal instruments.
Reputational	Lack of governance in data protection/records management could lead to significant reputational damage, due to the College having large volumes of sensitive data which it is obliged to protect.
Community/ Partnership impact	There are no direct community / partnership implications associated with these policies.
Environment	Policies discourage the creation or retention of large volumes of paper files, and therefore they are helpful for the environment.
Equalities	There are no significant equalities implications associated with these policies.

Records Management Policy

Approved:

March 2023

Date for Review:

March 2026



Records Management Policy

Quick Guide

Purpose

The purpose of this policy is to demonstrate the importance of managing records effectively within the College and to act as a mandate for the support and delivery of records management policies, procedures, and initiatives across the organisation.

General Principles:

- Records must be held in compliance with all applicable legal, regulatory, and contractual requirements.
- Records must not be held for any longer than required.
- The protection of records in terms of their confidentiality, integrity and availability must be in accordance with their security classification.
- Records must always remain retrievable in line with business requirements.
- This policy relates to all teams and business areas of WCS and all records created by our employees.
- It relates to the management of records as an internal, facilitative function of the organisation and covers the records created by the organisation, about its activities.
- It applies to all records regardless of format or medium, including paper, electronic, audio, visual, microform and photographic.

Record Types and Guidelines:

To assist with the definition of guidelines for record retention and protection, records held by WCS are defined with retention periods in the WCS Retention and Disposal Schedule.

Record Disposal Methods:

- **Confidential Destruction**
Cross-cut shredding or incineration, either internally or by an approved third-party contractor.
- **Deletion** – deleting documents and records from electronic systems.
- **Recycling** – non-sensitive information can be recycled by a reputable company, into a useable product.
- **Transfer to Archive** – records of enduring value selected for permanent retention should be transferred to archive.

History of Amendments

Date	Version/Pages/ Sections Affected	Summary of changes
March 2024	All	Transferred to new format and updated

Policy Statement

It is the policy of WCS to maintain authentic, reliable, and useable records, which can support business functions and activities for as long as they are required. WCS is therefore committed to the operation and continuous improvement of effective records management policies and procedures.

Equality Statement

The College is committed to providing equal opportunities to ensure its students, staff, customers and visitors are treated equally regardless of gender reassignment, race, religion or belief; disability; age; marriage and civil partnerships; pregnancy and maternity; sexual orientation; sex.

Please note this document is available in other formats, to request another format please email info@wcs.ac.uk

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1. Introduction

The Public Records (Scotland) Act 2011 places an obligation on named authorities in Scotland to produce a records management plan which sets out their arrangements for the effective management of all records.

FE Colleges are not named as authorities in the schedule of the Act, but it is nevertheless good practice to manage records formally and efficiently.

2. What is Records Management?

Records management can be defined as the process whereby an organisation manages its records, whether created internally or externally and in any format or media type, from their creation or receipt, through to their destruction or permanent preservation.

Records management is about placing controls around each stage of a record's lifecycle:

- at the point of creation (through the application of metadata, version control and naming conventions),
- during maintenance and use (through the management of security and access classifications, facilities for access and tracking of records),
- at regular review intervals (through the application of retention and disposal criteria),
- and ultimate disposal (whether this be recycling, confidential destruction or transfer to the archive branch for permanent preservation).

By placing such controls around the lifecycle of a record, we can ensure they demonstrate the key attributes of authenticity, reliability, integrity, and accessibility, both now and in the future.

Through the effective management of the organisation's records, West College Scotland (WCS) can provide a comprehensive and accurate account of its activities and transactions. This may be achieved through the management of effective metadata as well as the maintenance of comprehensive audit trail data.

We retain records that provide evidence of our functions, activities, and transactions, for:

- Operational Use – to serve the purpose for which they were originally created, to support our decision-making processes, to allow us to look back at decisions made previously and to learn from previous successes and failure, and to protect the organisation’s assets and rights.
- Internal and External Accountability – to demonstrate transparency and accountability for all actions, to provide evidence of legislative, regulatory, and statutory compliance and to demonstrate that all business is conducted in line with best practice.
- Historical and Cultural Value – to protect and make available the corporate memory of the organisation to all stakeholders and for future generations.

3. Why is Records Management Important?

Information and records are a valuable corporate asset without which we would be unable to carry out our functions, activities, and transactions, meet the needs of our stakeholders, and ensure legislative compliance.

The benefits of implementing records management systems and processes include:

- Improved information sharing and the provision of quick and easy access to the right information at the right time.
- The support and facilitation of more efficient service delivery.
- Improved business efficiency through reduced time spent searching for information.
- Demonstration of transparency and accountability for all actions.
- The maintenance of corporate memory.
- The creation of better working environments and identification of opportunities for office rationalisation and increased mobile working.
- Risk management in terms of ensuring and demonstrating compliance with all legal, regulatory, and statutory obligations.

- The meeting of stakeholder expectations through the provision of excellent quality services.

4. General Principles

There are several key general principles that must be adopted when considering record retention and protection policy. These are:

- Records must be held in compliance with all applicable legal, regulatory, and contractual requirements.
- Records must not be held for any longer than required.
- The protection of records in terms of their confidentiality, integrity and availability must be in accordance with their security classification.
- Records must always remain retrievable in line with business requirements.
- This policy relates to all teams and business areas of WCS and all records created by our employees.
- It relates to the management of records as an internal, facilitative function of the organisation and covers the records created by the organisation, about its activities.
- It applies to all records regardless of format or medium, including paper, electronic, audio, visual, microform and photographic.

5. Roles and responsibilities

All managers and heads of department have responsibility for records management within their area. They should be familiar with this policy and ensure that their area of responsibility complies with the policy. [Organisational core systems](#) should be used for records storage, wherever possible. The following table is indicative, but not exhaustive.

Departmental Area	Responsible Officer
The Board	Secretary, Board of Management
Executive Area	Executive Team
Organisational Development & HR	Head of OD and HR
Enterprise and Employability	Head of Enterprise and Employability

Campus Operations	Head of Campus Operations
Engineering	Head of Engineering Technologies
Student Academic Skills Development	Head of Academic and Skills Development
Language, Business and Leisure	Head of Languages, Business and Leisure Industries
Health, Wellbeing and Care	Head of Health, Wellbeing and Care
Access and Progression	Head of Access and Progression
Business Development	Head of Business Development
Construction and Building	Head of Construction and Building Services
Finance	Head of Finance
Student Services	Head of Student Services
Creative and Digital	Head of Creative and Digital Industries
Information Technology	Head of Information Technologies

6. Record Types and Guidelines

To assist with the definition of guidelines for record retention and protection, records held by WCS are defined with retention periods in the [WCS Retention and Disposal Schedule](#)

This policy applies to all teams as a minimum; however, teams may have additional arrangements documented.

7. Media Selection

The choice of long-term storage media must consider the physical characteristics of the medium and the length of time it will be in use. Where records are legally (or practically) required to be stored on paper, adequate precautions must be taken to ensure that environmental conditions remain suitable for the type of paper used. Where possible, backup copies of such records may be taken by methods such as scanning or digitisation. Regular checks must be made to assess the rate of deterioration of the paper and action taken to preserve the records if required.

For records stored on electronic media such as tape, similar precautions must be taken to ensure the longevity of the materials,

including correct storage, and copying onto more robust media if necessary. The ability to read the contents of the tape (or other similar media) format must be maintained by the keeping of a device capable of processing it. If this is impractical an external third party may be employed to convert the media onto an alternative format.

8. Record Retrieval

There is little point in retaining records if they are not able to be accessed in line with business or legal requirements. The choice and maintenance of record storage facilities must ensure that records can be retrieved in a usable format within an acceptable period. An appropriate balance should be struck between the cost of storage and the speed of retrieval so that the most likely circumstances are adequately catered for. Records should be kept on college core systems, where practicable.

Core Systems:

Microsoft 365

OneDrive

SharePoint

MS Teams

Moodle

UNITE

CIVICA

Evolve

iTrent

and other officially procured departmental software tools.

Staff should not store records or personal data on pen drives, removable media, social media apps, or messaging services (WhatsApp, Telegraph etc.).

9. Record Destruction

Once records have reached the end of their life, they must be securely destroyed in a manner that ensures that they can no longer be used.

10. Disposal Methods

There are four methods for the disposal of information:

- **Confidential Destruction** – official information should be destroyed in such a way that it cannot be reproduced by a third party and is completely illegible. This may be achieved through cross-cut shredding or incineration, either internally or by an approved third-party contractor.
- **Deletion** – deleting documents and records from electronic systems.
- **Recycling** – non-sensitive information can be recycled by a reputable company, into a useable product.
- **Transfer to Archive** – records of enduring value selected for permanent retention should be transferred to archive.

Both paper and electronic records should be regularly reviewed. Please note that any information currently subject to a Freedom of Information or Data Protection subject access request should be retained until at least 3 months days after the request has been fulfilled.

For information on all current requests, please contact dpo@wcs.ac.uk or foi@wcs.ac.uk.

10.1. Confidential Disposal of Official Physical Waste

Any information that WCS collects, stores, processes, generates or shares to deliver services and conduct business will be considered official material, with a security classification of at least INTERNAL. Some official material will attract a SENSITIVE handling caveat. This classification will apply to information which could have more damaging consequences for individuals or WCS generally if it were lost, stolen, or published in the media.

All official paper waste should be placed within the lockable consoles which are in use in all WCS campuses.

Confidential Waste consoles are emptied regularly, and their contents are shredded offsite. If you find that a console is full, please notify Estates, who will direct you to another one which has capacity. Estates can provide guidance on the location of consoles within buildings and on bulk waste disposal.

Shredders are also available in some buildings. These should be used to dispose of SENSITIVE material or other sensitive material which particularly merits a securer form of destruction. However, most official waste should now be disposed of in consoles rather than shredders. Waste from the shredder bins is disposed of as confidential waste.

If you have multimedia or hardware which requires confidential disposal raise a request through the IT Department. IT will arrange for the collection and disposal of this material.

For bulk disposal of archives waste at other times of the year please log a call via Estates.

A record of destruction should be retained for all material destroyed confidentially. Certificates of destruction are provided by the contractor who uplift waste. These certificates are then stored by Estates.

10.2. Deletion of Electronic Information

When deleting electronic information from systems ensure that any duplicates are also deleted and that you regularly empty the Recycle Bin on your computer desktop.

Emails deleted from Outlook mailboxes are deleted from the Exchange Server after 30 days. The Exchange Server is also backed up to disk for 12 weeks and 13-week-old data is purged.

Hard disk drives and removable media must be security wiped of data before they are disposed of in accordance with the IT Asset Disposal Procedure.

10.3. Disposal of Unofficial Waste (Non Sensitive)

All unofficial material should be placed in the bins available in all WCS buildings. The smaller paper waste recycling bins, which are colour coded green can also be used to dispose of unofficial waste. These sacks and bins will be checked regularly, and their contents disposed of appropriately. Staff should not use confidential waste consoles for the destruction of unofficial material as this is very costly to the organisation.

10.4. Transfer of Records to Archive

Any records of enduring value should be transferred to the College archives, in accordance with WCS's Archiving Arrangements.

Heads of departments are responsible for identifying records which merit permanent preservation on account of their enduring historical, cultural and research value.

11. Record Review

The retention and storage of records must be subject to a regular review process carried out under the guidance of management to ensure that:

- Records are being retained according to the policy .
 - Records are being securely disposed of when no longer required.
 - Legal, regulatory, and contractual requirements are being fulfilled.
 - Records identified and kept for permanent preservation.
 - Processes for record retrieval are meeting business requirements
- The results of these reviews must be recorded.

12. Useful Links

- Records Disposal Schedule

<https://intranet.westcollegescotland.ac.uk/teams/odhrportal/GDPR/Records%20Disposal%20Schedule%20Template.docx>

- [Retention Disposal Schedule](#)
- [GDPR Guidance Folder](#)

13. Equality Impact Assessment

The Equality Impact Assessment can be found [here](#)



Data Protection Policy

Approved:

March 2023

Date for Review:

March 2026



Data Protection Policy

Quick Guide

Purpose

This document outlines West College Scotland's approach to the management of personal data, particularly special category and criminal conviction data processed by the College, as required by the UK General Data Protection Regulation (UK GDPR), Article 9 and the Data Protection Act 2018, Schedule 1, Part 4.

General Principles:

West College Scotland processes special category and criminal conviction data as part of its statutory duties under employment and social protection law, and for reasons of substantial public interest. The College will detail its procedures for compliance with the principles of Article 5 of the UK GDPR, and outline its policies as regards retention and erasure of this data.

Types of Data:

- **Criminal Conviction Data** - Data processed relating to criminal convictions and offences, or related security measures. The most common processing of this data in the College is when staff are checked for recorded criminal convictions with Disclosure Scotland under the [PVG](#) scheme.
- **Special category data**
 - Racial or ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade Union membership
 - Genetic and biometric data used to identify an individual
 - Health data
 - Sexual/ sex life data
 - Sexual orientation
 - Protected characteristics not covered above.

GDPR Article 5 Compliance:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

History of Amendments

Date	Version/Pages/ Sections Affected	Summary of changes
April 2017	Pages 19/20	Retention details updated
April 2018	Whole document	Revised for implementation of EU GDPR
March 2019	Section 12	Updated to include reference to Subject Access Request Procedure
October 2022	Whole document	Overhaul of content and structure
October 2022	Whole document	Update of legislative references, particularly UK GDPR
October 2022	Whole document	Inclusion of requirements related to DPA 2018, Schedule 1, Part 4: special category and criminal conviction data
February 2024	Whole document	Update and convert to new format

Policy Statement

The UK General Data Protection Regulation (UK GDPR) requires the College to process any personal data in accordance with the UK GDPR Data Protection Principles and ensure that we meet our legal obligations as laid down in Data Protection Law. This Policy has been reviewed to enable the College to comply with the requirements of the UK GDPR and the Data Protection Act 2018. West College Scotland processes special category and criminal conviction data as part of its statutory duties under employment and social protection law, and for reasons of substantial public interest. The College will detail its procedures for compliance with the principles of Article 5 of the UK GDPR, and outline its policies as regards retention and erasure of this data.

Equality Statement

The College is committed to providing equal opportunities to ensure its students, staff, customers and visitors are treated equally regardless of gender reassignment, race, religion or belief;

disability; age; marriage and civil partnerships; pregnancy and maternity; sexual orientation; sex.

Please note this document is available in other formats, to request another format please email info@wcs.ac.uk

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1. Purpose

This document and associated procedures referred to in this document outlines West College Scotland's approach to the management of personal data, particularly special category and criminal conviction data processed by the College, as required by the UK General Data Protection Regulation (UK GDPR), Article 9 and the Data Protection Act 2018, Schedule 1, Part 4.

2. Policy Statement

West College Scotland processes special category and criminal conviction data as part of its statutory duties under employment and social protection law, and for reasons of substantial public interest. The College will detail its procedures for compliance with the principles of Article 5 of the UK GDPR, and outline its policies as regards retention and erasure of this data.

3. Responsibility for the Implementation of this Policy and Associated Procedures

This policy applies to all College staff processing personal data, special category personal data, protected characteristics data, and criminal convictions data.

4. Definitions

a) Criminal Conviction data

Criminal conviction data is the data processed relating to criminal convictions and offences, or related security measures (UK GDPR, Article 10). The most common processing of this data in the College is when staff are checked for recorded criminal convictions with

Disclosure Scotland under the [Protecting Vulnerable Groups \(PVG\)](#) scheme. Students on work placements may also be Disclosure Scotland checked, for example if their placement is at a nursery or requires them to work with children or vulnerable adults.

b) Special category data is defined by UK GDPR Article 9(1):

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade Union membership
- Genetic and biometric data used to identify an individual
- Health data
- Sexual/ sex life data
- Sexual orientation

c) Protected Characteristics

Protected Characteristics, as defined under the Equality Act 2010 (Article 4), should be treated as Special Category Data for data processing purposes and include:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

5. What Laws Apply

Due to the sensitive nature of special category data, protected characteristic data and criminal convictions data, there are a number of laws in place to restrict and manage processing of this information by organisations, including Colleges. Other laws oblige the College to

process such data for specific purposes. The three areas of legislation most relevant at this time are described below. Note that, should any of these legislative vehicles be superseded during the period of this policy, then the most relevant legislation will be deemed to be covered by this policy.

5.1. UK General Data Protection Legislation (UK GDPR)

GDPR is EU legislation which came into force on 25 May 2018. UK GDPR is legislation which came into force in the UK on 31/12/20, due to the UK's exit from the European Union. UK GDPR was created by amendments in the [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2019](#).

The reason for this legislation is to ensure that the privacy rights of individuals are upheld by organisations, including Colleges, that process personal data. Organisations must only process personal data where it is lawful and fair to do so; be transparent in how they process this data; process the data only for the purpose it was collected; only request the minimum amount of data required for the purpose; ensure the data is accurate, up-to-date and not kept longer than necessary; and is processed using technical and organizational measures that ensures the security of the data.

UK GDPR provides protection to personal data; that is information that relates to a clearly identifiable living individual, for example a student or a member of staff.

UK GDPR supports an individuals' rights in relation to the personal data an organisation, such as a college, processes, including being made aware of how their data is processed; requesting copies of some or all of this information or requesting that their information is changed, updated or deleted; and restricting processing of their data.

Most personal data collected by the College from students and staff is processed on the basis of contract (Article 6(1)(b), or public task (Article6(1)(e)). Most special category and protected characteristics

data is collected by the College on the basis of employment and social protection law (Article 9(2)(b) or substantial public interest (Article 9(2)(g)). Criminal convictions data collected by the College is done so in-line with Article 10 of the UK GDPR, which stipulates that processing can only be carried out under the control of official authority, or when the processing meets the requirements of the Data Protection Act 2018 (see below), with appropriate safeguards in place to protect the rights and freedoms of data subjects.

5.2. Data Protection Act 2018 (DPA 2018)

The DPA 2018 enacted the EU GDPR law into UK law and establishes additional safeguards for handling special category and criminal conviction data (Schedule 1, Part 4):

- an appropriate policy document (this document);
- outlining how the controller's procedures comply with the UK GDPR Principles (Article 5) (e.g. Data Protection Policy/Procedure/Guidance)
- outlining the controller's policies on retention and deletion of data, and whether policies are strictly adhered to
- retaining and reviewing policy document(s)
- making this document available to the Information Commissioner's Office upon request.

5.3. The Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR)

The Privacy and Electronic Communications Regulations (PECR) sit alongside the Data Protection Act and the UK GDPR. They give people specific privacy rights in relation to electronic communications.

There are specific rules on:

- marketing calls, emails, texts and faxes
- cookies (and similar technologies)
- keeping communications services secure; and

- customer privacy as regards traffic and location data, itemised billing, line identification, and directory listings.

6. UK GDPR Article 5 Compliance

The College complies with the UK GDPR Principles under Article 5, as outlined in the College Data Policy, and underlying procedural documents which are available on the College intranet.

1. Lawfulness, fairness and transparency

The College will regularly review forms and other methods of gathering data, to ensure that the processing is fair and lawful. The College will be transparent with data subjects and publish privacy notices where appropriate.

2. Purpose limitation

The College will ensure that data is only processed for the purposes listed in the Records of Processing Activity.

3. Data minimisation

The College will not collect or process data for which there is not a listed purpose in the Records of Processing Activity.

4. Accuracy

The College will ensure, wherever possible, that data subjects can access and update their records, to ensure accuracy.

5. Storage limitation

Data will be securely deleted at the end of the listed retention periods. Departmental retention schedules can be found on the College intranet.

6. Integrity and confidentiality (security)

The College will make every effort to ensure the security, integrity and confidentiality of data. See the College IT Security Policy. The College is Cyber Essentials Plus certified.

7. Accountability

The College will keep detailed records relating to compliance and accountability issues and will record these in a version of the Information Commissioner's accountability tracker.

7. Staff Training

The College will ensure all staff are trained in data protection, specifically relating to personal, special category and 'protected characteristics' data and the legislation underpinning this (see Section 3 above). This training will be periodically refreshed and will form part of the induction process for all new staff.

8. Advice for Staff

While all staff will receive training (outlined in Section 5 above), the College recognises that staff may either require specialist advice or assistance where a request for personal and/or College information goes beyond what a reasonable member of staff would consider a normal request for someone in their role.

Staff should, in the first instance, discuss their query with their line manager. Should your line manager be unavailable (e.g. on leave or off ill) you should contact the Data Protection Officer at dpo@wcs.ac.uk for advice as soon as possible.

9. Special Category Data: Lawful bases

Special category and/or 'protected characteristics' staff and student data will be processed by the College for several reasons related to, and not incompatible with, the specified purpose for which it was originally collected (as outlined in the [College Privacy Notices](#)).

9.1. Staff

The College processes various types of special category data for employees, including:

- Sickness absence data
- Occupational health data
- Health and safety data
- Disciplinary and grievance procedure data
- Trade Union membership data
- Equality and diversity data
- Protected Disclosure data

Article 6 and 9 lawful bases for all data held by the College are available on the College intranet in the Records of Processing Activities.

9.2. Students

The College processes special category data related to students, including:

- Equality and diversity data
- Counselling data
- Health and safety data
- Safeguarding data
- Personal learning support plans
- Personal escape plans

Article 6 and 9 lawful bases for all data held by the College are available on the College intranet in the Records of Processing Activities.

9.3. Exceptional_circumstances

There may be exceptional circumstance where the College may have to share special category or 'protected characteristics' data using a different lawful basis, including but not limited to:

An emergency

For example, where a student or member of staff is in a life-or-death situation, the College may have to share special category data to a paramedic, or other health worker:

- UK GDPR Article 6(1)(d) – vital interests
- UK GDPR Article 9(2)(c) – vital interests

Legal claims

For example, where the College is approached and asked to provide data on staff or students necessary to establish, exercise or defend a legal claim or as evidence for court:

- UK GDPR Article 6(1)(c) – legal obligation
- UK GDPR Article 9(2)(f) – legal claims

10.Criminal Convictions Data: Lawful Bases

The College has a statutory duty to protect children and vulnerable adults, as outlined in the [Protection of Vulnerable Groups \(Scotland\) Act 2007](#). Where appropriate, the College will conduct criminal convictions checks to ensure that staff in contact with children and vulnerable adults do not pose a threat to their safety.

Similarly, the College will conduct criminal convictions checks to ensure that students undertaking a work placement where they will be in contact with children and vulnerable adults do not pose a threat to their safety.

This means that the College processes staff and/or student criminal convictions data on the following legal bases:

- UK GDPR Article 6(1)(c) – legal obligation
- UK GDPR Article 9(2)(g) - reasons of substantial public interest

- DPA 2018, Sch 1, Part 2, 18 – safeguarding of children and individuals at risk; (Protection of Vulnerable Groups (Scotland) Act 2007)

11. Retention and Erasure

The College retains the data defined in this policy for the minimum periods of time required to meet its statutory duties. The Data Retention Schedules can be found on the College intranet.

12. Policy Management

This policy will be reviewed periodically, and will be made available to the ICO, upon request and without charge. It will be held and reviewed until a period of at least 6 months after the College has ceased processing such data.

13. Related Policies and Procedures

- [Data Breach Procedure](#)
- [Records Management Policy](#)
- [GDPR Guides](#)
- [Equality Impact Assessment](#)



Policy & Procedure	Business Continuity
Policy Area	Finance and Estates
Version Number	05
Approving Committee	Audit and Risk Committee
Date of Approval	24 February 2026
Date of Equality Impact Assessment	TBC
Date of Next Review	01 April 2028
Responsible Senior Manager	Director of Finance and Estates

Policy Statement

To meet the College's objectives and ensure continuity of its operations and plan for the recovery / renewal of services in the event of serious disruption.

Associated Policies/Procedures

Where applicable Procedures associated with observing the policy are contained within this policy document, listed below and available on the below link on the Staff Intranet. Template documents associated with this policy are also located in the Forms section of the Staff Intranet.

<https://intranet.westcollegescotland.ac.uk/reference/SitePages/Policies%20and%20Procedures.aspx>

Equality Statement

The College is committed to providing equal opportunities to ensure its students, staff, customers and visitors are treated equally regardless of gender reassignment, race, religion or belief; disability; age; marriage and civil partnerships; pregnancy and maternity; sexual orientation; sex.

Please note this document is available in other formats, to request another format please email info@wcs.ac.uk

History of Amendments

Date	Version/Pages/Sections Affected	Summary of changes
06/02/2018	Version 1	
06/05/2021	Version 2	
08/12/2021	Version 3	New policy template
March 24	Version 4	Review by VP Operations
February 26	Version 5	Review by Director of Finance

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1. Scope

This document applies to all services within all the West College Scotland (the College) sites. Each faculty/department will formulate their own Business Continuity Plan (BCP), considering this document and associated guidance. Subject to approval by the appropriate Senior Leadership Team (SLT) Each faculty/department may exclude parts of their operations that they consider falling outside of the scope of their BCP's, provided that, such exclusions are documented and do not negatively impact on the College's ability to deliver its services.

This Policy does not seek to replace or supersede existing relevant policies or planning (e.g., site specific) documents. Instead, it advocates the use of existing risk registers and appropriate incident reporting mechanisms and will link closely with the College's emergency preparedness activities.

2. Introduction

The aim of having a Business Continuity Management System (BCMS) is to ensure that the College can maintain its activities in the face of disruptive challenges. Therefore, all faculties/departments are expected to prepare, exercise, maintain and review BCP's based on the principle that each faculty/department should be able to maintain its own critical activities which are key to contributing to the strategic intention of the College.

This Policy defines a broad framework for the implementation of the College's BCMS to minimise the impact of business disruption. Full compliance with this Policy will ensure procedures exist for recording, assessing, and managing business continuity risk; identifying and prioritising essential activities; responding to business disruptions or incidents, regardless of cause and maintaining essential services or restoring services to a minimum acceptable level.

3. Principles

The College's business continuity planning is devised to deal with the impact(s) of an event/situation/disruption as opposed to addressing the potential causes and such business continuity arrangements are crucial to the successful management of the College.

The strategic responsibilities for BC rest with the Vice Principal Operations and are governed by the SLT, however, viability of the College's BCMS is determined by the commitment and ownership demonstrated by the various services.

The College's SLT, through the Director of Finance and Estates (DFE) will ensure that BCPs are reviews at least annually, or earlier if subject to significant change and that any new system or activity has documented BC procedures that augment wider faculty / department planning.

The College, through the Vice Principal Operations / DFE, will provide adequate training as well as testing and exercising to validate its plans at regular intervals to ensure awareness of the requirements of this Policy.

On completion of BCPs, they should be stored securely with both an electronic and hard copy available locally as well as utilising existing software within the business continuity portal of the College Intranet and properly version controlled by the DFE.

BC planning is a dynamic, iterative, composite process, which allows for further development and adaptation as circumstances change or risks evolve.

4. Strategic BCM Aim

To develop, implement and manage a robust and effective BCMS to protect College operations, including its staff, students, visitors, and contractors were reasonably practicable.

5. Strategic BCM Objectives

The College's strategic business continuity objectives are to:

- Provide a framework for the development, implementation and monitoring of a Business Continuity Management System (BCMS)
- Identify, assess and minimise business continuity risk
- Ensure that the BCMS adequately addresses planning, processes, training and continuous improvement to manage disruptions that may affect the College or its interests
- Support the delivery of the College Corporate Plan
- Safeguard the College's reputational integrity
- Raise awareness of Business Continuity and the interdependencies between teaching and support services

6. Statement of Intent

The College is committed to developing, implementing and managing a robust and effective BCMS as a key mechanism to:

- Ensure that a formal, consistent, co-ordinated and cost-effective approach to the continuity of its teaching and support activities within the education environment
- Identify the critical activities of its business via robust Business Impact Analysis (BIA) and risk assessment
- Protect, maintain and recover business critical activities as recognised in relevant BIA

- Develop BC plans to ensure continuity of activities at a minimum acceptable level and within specified timeframes
- Develop a culture of Business Continuity Management that feeds into the College's planning and management processes
- Maintain the confidence of staff, students, other key stakeholders and visitors
- Protect and uphold the reputation of the College and manage an up to date and relevant BCMS

The SLT, through the leadership of the Vice Principal Operations, will endorse and drive the development of a strong BC culture, which is an essential ingredient to providing an effective BCMS.

The College, through the Vice Principal Operations / DFE, will implement a programme of training, exercises, maintenance and review, which will be delivered through an annual work plan.

Vice Principals, Assistant Principals and Directors will ensure that nominated Business Continuity Coordinators maintain BC plans (based on a standard template) for critical activities within their areas of responsibility.

The coordinators will maintain and review BC Plans including the Business Impact Analyses on an annual basis or sooner if significant change is required due to circumstances.

All staff who are expected to respond to a disruption, working for and on behalf of the College, must be aware of the BCP appropriate for their areas of business and their role in preparation for an event/disruption.

7. Roles and Responsibilities

This section outlines the roles and responsibilities for relevant staff in respect of BCM.

Principal

The Principal has overall responsibility for Business Continuity Management within the College however delegates this Strategic responsibility to the Vice Principal Operations to ensure implementation of this Policy throughout the College estate.

Senior Leadership Team (SLT)

The Senior Leadership Team (SLT) will:

- Ensure appropriate structures are in place to implement effective Business Continuity arrangements
- Monitor the implementation of this Policy
- Raise issues of resource necessary for the adequate control of severe BC risks at the appropriate budgetary forums.

Vice Principal Operations / Director of Finance and Estates

The Vice Principal Operations / Director of Finance and Estates have tactical and operational responsibility to implement the requirements of this Policy and ensure that:

- The SLT is provided with reasonable assurance or is kept informed of any significant business continuity risks and any associated significant developments, concerns or issues
- There is specialist advice on business continuity matters and that this is available to relevant College staff
- There is appropriate documentation identifying the Policy and guidance
- Financial support is available if BC arrangements are invoked in conjunction with the Head of Finance

- Facilitate provision of specialist advice and guidance on BCM issues including the coordination, development, implementation and review of BC plans, processes and procedures
- Provide accessible reference data by way of the College intranet
- Meet with identified faculty/department representatives to establish routine and structure, as well as the review of business impact analysis and plans on an annual basis when necessary
- Work in partnership with Head of Campus Operations were necessary to risk assess current and future threats identified through horizon scanning and intelligence gathering
- Coordinating annual update of departmental BC plans
- Embed a Business Continuity culture through communication and the provision of awareness sessions, training and exercises to staff, according to their roles and needs
- Facilitate training, tests and exercise
- Audit compliance of BC plans
- Provide recommendations and other management feedback as appropriate
- Represent the College in the wider education business continuity arena

Local Continuity Management Teams

As part of the planning and response arrangements for any incident, which invokes the BC plans, critical business steam representatives and coordinators roles will be nominated by the SLT.

Having taken part in the preparation of Business Impact Analysis. These individuals will form the teams which will enact the BC response when an incident occurs. They will also conduct the annual review of arrangements pertinent to their area.

(IMT)

Upon the occurrence of a disruptive event, involving wider consequences across the College estate, it may be necessary to escalate the response. The College IMT, whose representatives are pre-determined from across the College services, will convene to provide leadership, coordination, communication and decision making during multi-agency coordination of emergency response.

A nominated individual will be identified by the Leader of the IMT to represent the College during multi-agency coordination of emergency response.

8. Incident Reporting and Debriefing

Business continuity incidents should be reported if the appropriate criteria is met (criteria for reporting is contained within the associated guidance manual) and debriefs should be coordinated by the leader of the IMT to ensure that learning and review informs continuous improvement.

9. Insurance

As part of the Risk Assessment, development, implementation and review of business continuity plans any decision to treat, tolerate, terminate or transfer risk for indemnification purposes must be documented and appropriate consultation sought with the Director of Finance and Estates.

10. Procurement

The College has a number of suppliers and partners upon whom it relies on to provide a continued service. In order to minimise any risk of disruption, by failure to supply a product or service, suppliers and partners identified as critical in the relevant Business Impact Analysis will be requested to provide assurances that they have BC arrangements in place.

Those responsible for commissioning or procuring goods or services from external suppliers should consult the Procurement Manager to ensure contracts and/or service level agreements contain the appropriate clauses in respect of business continuity.

11. Governance

The Senior Leadership Team (SLT) will convene annually to oversee the implementation and monitoring of the College's BCM Policy. This group will be chaired by the Vice Principal Operations and will be supplemented by staff from cross-College operations as required.

12. Training, Awareness and Exercising - Maintenance and Review

BC plans are to be validated at regular intervals to determine whether any changes are required to procedures and responsibilities. Planned review periods should not exceed 12 months.

The Vice Principal Operations / Director of Finance and Estates will:

- Develop and source a suitable programme of training in BCM and BC risk management
- Identify appropriate levels of training and awareness for staff, to enable cascade through their areas of activity to affect a strong BC culture across the College
- Organise exercises of the BC plans and advise on local exercising arrangements
- Prepare and monitor the annual resilience work/action plan

13. Cyber / Terrorist Attack / Martyn's Law

A cyber-attack or terrorist threat poses a significant risk to the continuity of College operations, potentially disrupting critical systems, compromising sensitive data, and impacting the safety of staff, students, and visitors. In the event of such an incident, the College will activate its incident response and communication protocols, isolate affected systems or areas, and work with relevant authorities to assess the threat, contain the impact, and restore essential services. Maintaining robust cybersecurity measures, physical security controls, and clear escalation procedures is essential to ensuring the College can respond quickly, protect its community, and resume normal operations as safely and efficiently as possible.

Martyn's Law (the Terrorism (Protection of Premises) Bill) introduces a strengthened duty for organisations to enhance public safety by improving preparedness for, and resilience to, potential terrorist incidents. In line with this legislation, the College will ensure proportionate security measures are in place across all campuses, including risk assessments, staff awareness, incident response planning, and clear evacuation and lockdown procedures. Compliance with Martyn's Law supports the College's wider business continuity arrangements by ensuring that staff and students are better protected, that emergency actions can be taken swiftly and effectively, and that the organisation is equipped to respond to and recover from a terrorism-related incident with minimal disruption to critical operations.

14. Monitoring

This Policy will be reviewed annually. The College will commission additional work or change the monitoring arrangements to meet the organisational needs.

15. Appendix A – Definitions

Business Continuity Management System (BCMS)

An ongoing Management and Governance process supported by the College Senior Leadership Team (SLT) and appropriately resourced to implement and maintain Business Continuity Management.

Business Continuity Management (BCM)

The holistic management process that identifies potential threats to the College and provides a framework for building resilience and the capability for an effective response that safeguards the interests of its Colleges and services, reputation and value creating activities.

Business Continuity (BC)

The capability for the College to plan for and respond to incidents and business disruptions in order to continue business operations at an acceptable predefined level.

Business Continuity Incident (BCI)

An event or occurrence that disrupts an organisation's ability to deliver normal service and where contingency arrangements are required to return them to an acceptable level.

Business Continuity Plan (BCP)

A clearly defined, documents and predetermined plan for use when business operations are disrupted by an event. Typically, the plan covers loss of premises, information, people, stock or other technologies.

Business Impact Analysis (BIA)

The process of analysing business activities which support wider organisational products and services, determining threats and risks and the effect business disruption may have on organisational viability.

Risk

Identification of potential vulnerability-based likelihood and impact.

Risk Assessment (RA)

The overall process of risk identification, analysis and evaluation.

Maximum Tolerable Period of Disruption (MTPD)

The point at which an organisations viability will be irrevocably threatened if the critical activities cannot be resumed.

Recovery Time Objective (RTO)

The target time for the resumption of a critical activity after an event.



Business Continuity Plan

Version: V9

Date: February 2026

Owner: Vice Principal Operations

VERSION CONTROL

Version	Modified on	Modified by	Details
6	31 July 2022	Alan Ritchie Jill McDonald	Plan updated – annual review and contact details updated
7	31 January 2023	Alan Ritchie Jill McDonald	Updates following management changes and exercise suggestions
8	30 January 2024	Julie McLaughlin	Update Job Role Titles
9	10 February 2026	Mark Doyle	Review and update following management review and recommendations

Updated versions of Business Continuity Plan will be issued on the Teams site and a note sent out to all Team members that an updated version is available.

1. Introduction

The purpose of the Business Continuity Plan (BCP) is to assist the College to prepare and respond to incidents that could cause significant disruptions to normal activities. To keep the BCP up to date and relevant, it will be reviewed annually or following any critical incident; any significant changes to the hardware and critical systems covered in the BCP; or following any significant changes to our organisational structure or processes. When changes are made an updated version of BCP will be made available on the Teams site and a notification sent to all members of the Team. Access to the Teams site will be limited to those members of staff who require to access the information on the site, and it will not be publicly available.

The BCP will be held securely as follows:

- An online copy in the Business Continuity Teams site
- A printed copy will be held in the Battle Boxes at each of our four main sites, being Clydebank, Greenock Finnart Street, Greenock Waterfront and Paisley. Battle Boxes are held in the Senior Leadership offices at Clydebank, Greenock and Paisley and at Reception at Waterfront Campus.

The BCP will include an up-to-date contact list for key stakeholders or organisations that may be involved in any incidents. Which includes staff, internal and external stakeholders, suppliers, and emergency services will also be included within the Teams site (see Business Continuity Contact sheet).

The BCP is the main reference document for use following a major incident. It sets out the generic response to any incident. In addition to this BCP, further BCPs will be developed to address specific scenarios defined during the risk analysis stage.

2. Scope

The BCP sets out how the College will respond to incidents causing significant disruptions to normal operations. The BCP is not supposed to cover every possible disruption. It is written to establish clear roles and responsibilities that will allow the management of the College to respond quickly and effectively to significant disruptions. The BCP applies to incidents happening at any College site. It may also have to be used following incidents off site that involve College students or staff.

The BCP is not intended to cover day to day operational disruptions that managers deal with regularly. It is to be used when there could be significant effect on operations, students, staff,

the environment and the reputation of the College, but to address potential risks identified during the risk analysis stage.

3. Definition of an Incident

Incidents are events that have the potential to cause significant disruption to normal operations. The following list is not exhaustive, however there is an expectation a member of the Incident Management Team (IMT) would be notified and then decide if the BCP should be invoked:

- Any incident that would cause a closure of any College site for one working day or more e.g. extreme weather, fire, flood or loss of utilities or too few staff available to continue operations
- Loss of access or damage to a critical room within a building likely to cause one day or more disruption to business as usual. Critical rooms could include catering facilities, Plant room, data centres or specialist teaching facilities
- Any incident that has or could result in a reportable incident under RIDDOR (Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations) or that could trigger a Health & Safety Executive investigation
- Any violent incident, or threat of violence, involving staff or students
- Any threat (terrorist or otherwise) made against the College. Martyn's Law (Protect Duty) requirements ensure proportionate security measures, threat awareness, and preparedness arrangements are embedded within the College's incident response and continuity planning. This is captured in the BCP policy.
- Any incident that requires emergency services to be called to a College site
- Any violent incident involving a member of the public, contractor or visitor on a College site
- Any incident that could have a significant reputational impact, e.g. a negative story in a local paper

4. Activation of BCP - Who to contact

A manager may become aware of a potential incident which has a possibility of becoming a material or significant incident. In such a case the manager should inform a member of the Senior Leadership Team (SLT) as soon as possible. An outline of the incident should be provided and that the manager will continue to investigate the matter and report back to the SLT member. If possible, a timescale should be established to ensure that the matter is not discarded. This is a precautionary stage which will allow the SLT member to put on notice the IMT members that they may be required. This precautionary stage should be conducted by phone rather than email

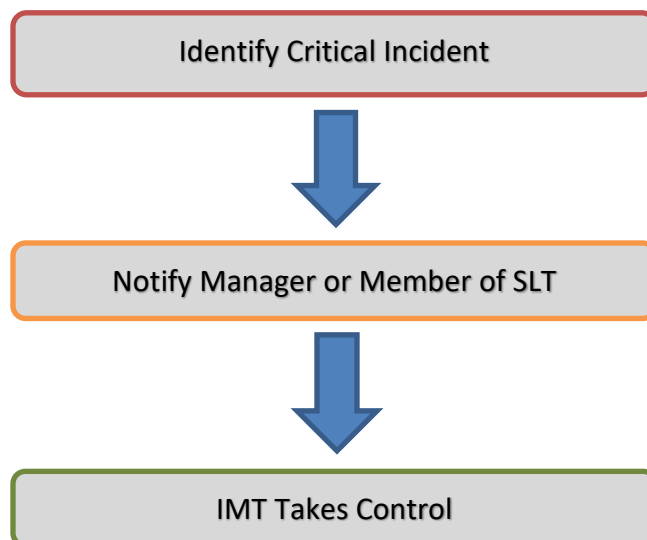
to ensure that the message has been received. Instant messaging can be used if unable to make contact by phone and only by email as a last resort.

As soon as a critical incident has been identified, the member of staff must notify their line manager. The line manager will contact a member of the Senior Leadership Team (SLT). If the line manager is not available, then contact the nearest manager or a member of the SLT.

For contact details of all relevant staff / stakeholders please see Teams site – Business Continuity Contact Details.

The College maintains a WhatsApp Business Continuity Group which allows IMT members to be informed immediately about a pending or actual incident. The members of this WhatsApp Group will be reviewed at least annually in line with the requirement to review the overall Business Continuity Plan. The use of WhatsApp should be limited to general information and not specific data / critical information. Where specific information needs to be shared the Business Continuity Teams site should be used for this purpose.

Once notified of a critical incident, the SLT / Manager will pull together the Incident Management Team (IMT) led by the Vice Principal of Operations (VPO) who will assume lead responsibility. Where the VPO is unavailable when an incident takes place, another member of the SLT will assume the authority to make any decisions required. Staff will be co-opted onto the team depending on the nature of the incident.



The decision to activate this Plan will normally be made by a member of the College Executive. Any decision to close a campus following an incident must also be made by the Executive. Should a member of the Executive not be available then the decision to activate BCP can be initiated by:

- Director of Finance and Estates
- Any Member of SLT
- Senior Presence (SLT / Head)

The member of staff who is activating the BCP should take charge of ensuring that all members of the IMT are contacted. The information to be conveyed to the members should include:

- Reason for the phone call
- Time, location, and nature of the incident
- What action is required next

Outside of core hours the Estates Call-Out Procedure will be followed until a member of the IMT is alerted to the incident. If the incident can be dealt with by the Estates staff it will be closed off. However, should this not be the case, the Estates staff will make contact with the relevant member of staff and BCP will be activated as required.

5. Incident Management Hierarchy

Incident Management Team (IMT)

The IMT is responsible for incidents. The primary role of the team is:

- To assess the situation by gathering information from as many sources as possible
- Agree an Action Plan to protect human life, the environment, the College's assets and the reputation of the College
- Communicate with key (internal & external) stakeholders throughout, including both teaching and support staff unions
- Review progress throughout any disruption and take appropriate decisions to get back to normal operations
- Ensure lessons are learned following any incidents to prevent future losses or be better prepared to cope if they do happen.

The IMT is made up of 'core' and 'non-core' team members.

Core Team Members:

- Vice Principal of Operations (IMT Leader)
- Vice Principal of Educational Leadership
- Director of IT and Digital Transformation
- Director of Finance and Estates
- Director of Organisational Development and HR
- Director of Student Experience
- Head of Campus Operations
- PA to Executives
- PA to SLT

Non-Core Team Members:

- Health and Safety Advisors
- Estates Managers
- Heads of Sector / Department

It is expected all members of the core team (or their deputies) will be involved in the response to most incidents. Non-core team members may be asked to join the team depending on the circumstances, for example if specialist operational or technical advice is needed. All team members have a nominated deputy. Some deputies will be asked to join the IMT while others may be consulted or asked to provide technical or operational advice in the absence of the primary IMT member.

6. Command Centres

The IMT require a room to meet and manage the response to the incident from the most appropriate command centre. Each command centre should provide the following:

- Access to the College ICT networks
- Space for all members of the IMT to get around a table
- Whiteboards or flipcharts for note taking

Command centre locations are as follows, although will be subject to change in regard to the circumstances of the incident:

PAISLEY

Executive Suite Renfrew Building

Phone: 0141 581 2211

Glynhill Hotel - 169 Paisley Road, Renfrew PA4 8XB

Brian Spence (brian@glynhill.com)

Phone: 0141 886 5555

CLYDEBANK

SLT Suite 3rd floor

Phone: 0141 951 7412

Room 001 (just off reception)

Golden Jubilee Conference Hotel – Beardmore Street

Phone: 0141 951 6000

Glasgow, G81 4SA

Denis Flanagan (denis.flanagan@goldenjubilee.scot.nhs.uk)

GREENOCK

Leadership Suite 1st floor

Phone: 01475 553001

Student Services area off main reception

Phone: 01475 724433

Tontine Hotel - 6 Ardgowan Square, Greenock PA16 8NG Phone: 01475 723316

7. Recording and Monitoring

It will be essential to keep a log of actions taken and by whom to report on what happened, what was done and the results and outcomes of a critical incident. The Critical Incident Log Sheet should be used for this purpose and should be managed by a delegated member of the IMT (See Appendix A for an example of the format to be used).

Other formats of incident logging may be more appropriate and will depend on the circumstances – use of a whiteboard (remember to take photograph of content before wiping clear), Teams tasks can be used, Outlook tasks can also be used. The aim is to ensure that a log of actions is taken, and resolutions are maintained for future reference. The incident log will be used for insurance purposes or may be required for follow up investigations.

A member of the IMT should be delegated to be the central point of contact for all enquiries. These enquiries should be recorded on an Enquiry Log (see Appendix B for an example of the format to be used). As the enquires are addressed they should be scored through but not deleted. This will allow any member of the IMT to pick up the Enquiry Log and continue to deal with enquiries in the absence of the delegated IMT member.

8. Investigation and Analysis

Following the Recording and Monitoring process, the Critical Incident Log (Appendix A) will form the basis of the investigation and analysis after any critical event, together with the Incident Assessment Checklist (see Appendix D). Any investigation should enable us to understand:

- What caused the incident
- Could the incident have been prevented
- Were there any underlying failures in health and safety management
- What lessons have been learned – is there anything we need to do differently?
- What actions are required to prevent or minimise a recurrence

One of the main benefits of investigating, analysing and reporting on an incident is to contribute to the corporate knowledge held by an organisation. It is therefore important that this information be discussed and shared with staff as deemed appropriate by the IMT.

9. Communications

Emergency Communications

In the event of an emergency, the Director of Student Experience or a Marketing & PR Executive should be contacted at the earliest opportunity to allow them to assess the scale and nature of possible media interest and to decide upon an appropriate response, if it is judged that a response is required.

The College has developed a [Major Incident Communications Response Manual](#) which can be found on the Business Continuity Teams site. The manual is designed to support the containment and subsequent recovery from a serious reputational issue. The manual provides practical guidance on how to assess an incident and what the potential response could be. It is advised that all staff involved in the business continuity process make themselves familiar with the contents of the manual in advance of any incident.

It is important that any response the College may choose to give is informed by all the available information and by a judgement as to what is in the best interests of the College's staff and students. Therefore, in no circumstances should any member of staff offer comment on behalf of the College to any media outlet without first liaising with the Communications Directorate. For similar reasons, all media requests for comment and broadcast interviews (live or pre-recorded) must be directed to the Communications Directorate.

Should the College choose to respond to media requests it will do so in the name of the Principal or a “College Spokesperson”. In the event of the Principal being unavailable, comment will be issued in the name of one of the two Vice Principals, with their prior consent. Comment will usually be issued to media outlets via email and, if practical, on the College’s social media platforms.

Should the College accept requests for broadcast interviews, these will be conducted, whenever possible, by the Principal. In the event of the Principal being unavailable and depending on the emergency and the nature of the interview requested, the Vice Principals and the Director of Student Experience will decide who among themselves should conduct the interview.

Communication to Staff / Unions

Make sure regular updates are provided to staff and unions about the incident and how they should deal with it:

- Information will be disseminated from the IMT to all staff. This will be via a communication tree process, whereby the message is handed down from SLT level to Senior Manager Level and so on.
- The IMT should also consider at which point to inform the unions of the incident. It is likely that staff will directly approach their union representatives in the case of an incident. By keeping the unions informed this will assist in ensuring that any messaging is communicated effectively.
- The data in the communication tree must be revised following any changes to staffing and must be accessible to all staff taking responsibility for passing on the communication.
- The primary information channel used to communicate will depend on the issue being experienced.
- Some communication may be required across the organisational structure. All members of SLT should therefore hold each other’s emergency contact details.
- The IMT will decide who should know what about the incident and when they should know about the incident.
- The IMT will specify to staff what message is to go out to external stakeholders.
- All enquiries coming in and out from the main contact phonenumber / email address should be recorded on an Enquiry Log (see Appendix B)

10. Closure Protocol

Decision to close any campus or the whole College must be taken by Principal and/or VP and only in exceptional circumstances will the decision to close be taken by member of SLT.

If decision to close a main campus is taken, consideration should be given to whether the closure of local satellite sites is also merited i.e. if a weather-related incident occurs.

Decision will be taken on advice of:

- Local Authorities who will potentially close schools and other local services
- West Dunbartonshire
<https://twitter.com/WDCouncil>

<https://www.west-dunbarton.gov.uk/emergencies/severe-weather/school-and-nursery-closures/>
- Renfrewshire
[RenCouncil \(@RenCouncil\) / Twitter](#)

<https://www.renfrewshire.gov.uk/>
- Inverclyde
[Inverclyde Council \(@inverclyde\) / Twitter](#)

<http://www.inverclyde.gov.uk/advice-and-benefits/winter/>
- Ready Scotland
<https://twitter.com/readyscotland>

<http://readyscotland.org/>
- Advice from Met Office
<http://www.metoffice.gov.uk/public/weather/warnings/#?tab=warnings&map=Warnings&zoom=5&lon=-3.50&lat=55.50&fcTime=1422403200>
- Local staff who are present at the campus

Based on review of the above information by the IMT Leader, the decision to close will be taken by Principal / VP as early as possible.

In terms of communicating closure, the following will be initiated by stated staff member or by deputy. Communication to all staff to include as a minimum whole / partial closure, reason for the closure, anticipated length of the closure, to refer to website and social media for updates:

- Communication to Principal – IMT Leader
- Communication to VP – IMT Leader
- Communication to AP / Director – VP with direct line management responsibility
- Communication to immediate managers to inform them of closure – AP / Director
- Communicated to Estates Staff / H&S Managers – Director of Finance and Estates
- College telephone outgoing message to be updated – Director of IT and Digital Transformation
- Student and Staff College email – IMT Leader
- Website, College Intranet, Facebook and Twitter – Director of Student Experience
- Message on MyDay platform - Director of Student Experience
- Text message to students and staff – Director of Student Experience
- Media if necessary - Director of Student Experience

11. Loss of Premises

In the event of loss of one or more of our premises, where possible activity should be moved to other campuses, if this is not possible then external stakeholders must be contacted to arrange alternative temporary accommodation. For main departmental contact details refer to individual departmental Business Continuity Plans which are available on the Teams site.

12. Loss of IT

Please refer to the Vice Principal Operations for the Cyber Incident Response Plan (CIRP) and IT Disaster Recovery Plan (DRP) to be implemented. The CIRP is held on the Business Continuity Teams site and is available to permitted staff.

13. In the Event of a Fire

Should a fire break out follow the Business Continuity Plan for a Fire (see Appendix E).

14. Terror Attack

In the event of a terrorist attack affecting the College, the Business Continuity Plan will be activated immediately to safeguard life, support emergency services, and maintain critical operations. The Incident Management Team will coordinate the response, ensuring rapid evacuation or lockdown as directed by Police Scotland, clear communication to staff and students, and swift implementation of alternative arrangements for essential services. Post-incident actions will focus on welfare support, stabilising operations, restoring priority functions, and working with authorities during investigation and recovery phases to ensure a safe and structured return to normal activity.

15. Other Issues including Staffing

Outbreak of disease (e.g., influenza pandemic)

- An influenza pandemic or similar occurrence may jeopardise staffing levels, directly through staff illness, or indirectly through fear of infection or through caring responsibilities for sick relatives. It is essential information is disseminated about how to identify symptoms of flu and what to do in the event of a member of staff becoming ill with suspected flu.
- In the event of a pandemic, any staff infected by the virus must remain off work to minimise spread. Staff who display symptoms should be sent home and advised not to return to work until they have fully recovered.
- IMT should identify the key functions of the College that must continue and establish if there are any departments with key person dependencies.
- From the business impact assessments, the IMT will be able to identify at what stage the staffing level is considered to be critical and how this differs departmentally/per key function depending on the time of year. This is particularly relevant for smaller departments where very few staff absences could mean the loss of a function.
- It must be recognised that it may be necessary to limit annual leave in order to sustain services.
- The IMT should prioritise keeping critical systems operating so that our online facilities continue to function for our stakeholders.

Fuel Shortage

In the event of a widespread fuel shortage, options will include:

- Increased use of public transport
- Car sharing
- Walking or cycling

When information indicates that a fuel shortage is expected, a list of staff living remotely from their place of work and with difficulties in accessing any of the above options will be compiled.

Industrial Action

As far as possible, without attempting to influence staff members' legal right to take industrial action, managers should try to estimate the proportion of staff that may be available to work in order to plan work in accordance with priorities.

Severe Weather

The College takes the safety of its employees very seriously and would not expect anyone to make the journey into work if this is likely to put them in any danger. Employees are however required to consider any reasonable alternatives to their normal method of transport (e.g., taking a train or bus instead of a private car) before making the decision not to come in. See also Hybrid Working Policy.

In the event that weather conditions deteriorate during the working day, and it appears that employees could have difficulty in travelling home the Principal or any other member of the Executive may decide to close the campus / College early to ensure employees are able to get home safely. The terms of Severe Weather Employer Guidance would apply.

Appendix A – Critical Incident Log Sheet

Date	Time	Critical Incident description	Action Taken and by whom	Outcome	Incident closure time

Appendix B –Enquiry Log

Date	Time	Name of person making the enquiry	Organisation represented	Contact number / email address	Notes on enquiry	Action required	Status (Resolved / Unresolved)

Appendix D – Incident Assessment Checklist

The checklist is designed to be used following a major incident. Not all information will be known in the early stages. The checklist should therefore prompt the IMT to revisit what is known and what needs further investigation throughout the incident.

Questions	Response
What is known about the Incident? Emergency services alerted? Has the site evacuated fully? Type of incident, e.g., fire, ICT failure etc. No. of injuries and deaths confirmed Who reported it, when and how?	
Is there likely to be any external organisations involved? Emergency Services HSE	
Have lines of communication been opened with them? Please note name & number of the contact	
What is the impact (or anticipated impact) on normal operations? Sites or buildings affected? Consider satellite buildings in any decision process	

Questions	Response
<p>3rd parties who use College facilities or are adjacent to College sites?</p> <p>Are there any special events taking place or coming up?</p> <p>Is this likely to disrupt a full day of 'normal' operations?</p>	
<p>Do you have any concerns about staff or student welfare resulting from the incident?</p>	
<p>Has the IMT been notified?</p> <p>Do all team members need to be involved?</p> <p>Are there any team members unavailable?</p>	
<p>Is there likely to be media interest in the incident?</p> <p>If so ensure that the following are informed:</p> <p>Director of Student Experience</p> <p>Principal</p> <p>Chair of the Board of Management</p>	
<p>What are functional departments doing about the incident?</p> <p>Support departments:</p> <p>Estates</p>	

Questions	Response
IT Catering Student Support/Funding Marketing / Communications HR MIS Finance	
Consider invoking the Incident Management Plan.	

Appendix E – Business Continuity Plan for a Fire

No	Actions	Notes	Priority / Timing	Accountability	Complete ✓
1	Initiate Fire Evacuation Plan		High	IMT Leader	
2	Hand over site to fire brigade		High	H&S Advisors / Senior Presence	
3	Convene IMT at appropriate command centre location		High	IMT Leader	
.4	Activate Incident Management Plan		High	IMT Leader	
5	Contact Executive to advise		High	IMT Leader	
6	Assign staff member to consult with Fire Brigade		High	IMT Leader	
7	Make assessment of likely duration of Incidents and impact on operation		High	IMT Leader	
8	Decide if staff and occupiers should remain on site or be sent home		High	IMT Leader	
9	Identify key internal stakeholders		High	IMT Leader	
10	Draft communication to staff		High	Marketing	

Title of Paper	Sustainability Update Report
Presented by:	Nicola Connelly, Interim Vice Principal of Operations
Recommendation:	To Note
Status:	PUBLIC
Linked To:	
KPI(s)	
Strategic Objective	All – Sustainability
Strategic Risk	Reputational Risk

Purpose / Executive Summary:

This paper provides the Corporate Development Committee with an:

- a) Overview of activities undertaken since the previous Committee.
- b) Overview of sustainability projects planned for 2025-26.

The College is continuing to renew the Sustainability Framework and develop and implement the College sustainability action plan. The College considers that it is making progress on implementing the requirements but that in line with the overall public sector, any continuation of this upward trajectory will require more investment by the Scottish Government.

The paper is presented in line with Corporate Development Committee Terms of Reference: *‘To consider and advise the Board of Management on the development and implementation of College policy and strategy, including but not limited to the following areas:*

- *Estate*
- *Carbon management and sustainability*

Recommendations:

The Corporate Development Committee are asked to **review** the contents of the report.

Implications:	
Financial	The paper highlights the material investment required to be made by the College to address the challenges of climate change. External funding support is required to allow these investment opportunities to proceed.
Student Experience	The climate challenge faced by the College is recognised and it is known that increased sustainability measures are important to our students.
People	No direct people impact in this report. The staff and wider stakeholders will be supported by the actions being taken by the College in the coming months and years.
Legal	The College has a commitment to become net zero by 2040 alongside the annual Scottish Government reporting requirements. The College may not be able to achieve its net zero target without external funding support.
Reputational	As noted above the College has a net zero target. An inability to achieve this target could result in reputational damage and therefore the College must be seen to have taken all reasonable steps to assist in achieving this target, more so as it is legislative.
Community/ Partnership impact	The College must support Communities in addressing climate change.
Environment	Direct implications in moving towards 2040 zero carbon target.
Equalities	No direct impact from the content of this report.

1. Sustainability Activities – Past Three Months

1.1. The Sustainability Oversight Group met in December with a presentation from the EAUC (Environmental Association for Universities and Colleges). The EAUC highlighted the Colleges legal obligations and compliance around Sustainability and reaching Net Zero targets. Following this meeting, it was agreed that our focus would be:

- Update and condense our current Sustainability Strategy to include key objectives and timebound actions into the Sustainability Framework.
- Complete the College Road Map to benchmark the Colleges progress and to put new targets in place.
- Complete the Climate Risk Assessment Register to highlight potential areas of high risk and to put contingency plans in place.
- Complete the Adaptation checklist to mitigate potential risks and put in place improvement actions.

1.2. Sustainability Newsletter issued (copy attached as '14.1 Sustainability Newsletter January 2026').

1.3. Clyde Recycling carried out a site visit of the Paisley campus to look at housing a clothing bank. A location has been identified, and preparations have begun to promote the clothing bank over the coming weeks.

2. Future Events

2.1. Our priority remains the development and completion of the above documents which will provide the College with clear direction, with timebound actions set to monitor progress.

2.2. The Sustainability Officer and the EAUC Manager (Environmental Association for Universities and Colleges) to attend the Heads of Sector meeting to raise awareness around Sustainability and the legal obligations and importance of embedding sustainability within all areas of the College.

2.3. The Sustainability Officer to work closely with the Procurement Department to evaluate tender submissions around the Sustainability element.

3. RECOMMENDATION

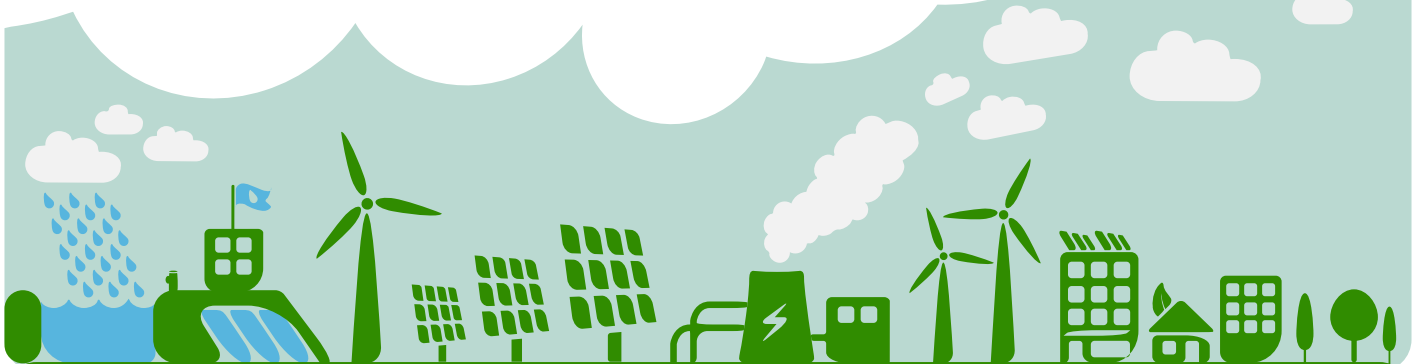
3.1. The Corporate Development Committee are asked to review the contents of the report.

Sustainability

NEWSLETTER

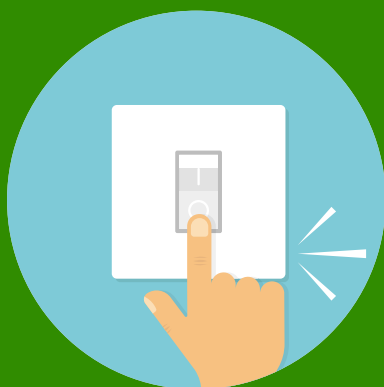
JANUARY 2026

Check out our latest
ENERGY UPDATE



Christmas Shutdown Energy Update

Thank you for doing your bit to switch off lights and appliances before the festive break. We would appreciate your continued support in switching off lights when not in use, keeping windows closed during colder months and putting on additional layers to help stay warm.



Turn off lights in empty rooms:

This is a fundamental habit that prevents energy waste. Contrary to a popular myth, it is much cheaper to turn modern lights off even for short periods than to leave them on.



Switching a laptop to energy-saving mode is an effective way to **extend battery life, reduce power consumption, and lower your carbon footprint.**

This mode works by making various adjustments via system settings: Select power and battery then energy recommendations.

Annual Reporting Update



This is our 10th year of completing the **Public Bodies Climate Change Duties Report**. We are pleased with the progress to date which has seen around a **50% reduction in our CO2 emissions** since our baseline year of 2015.

The key findings for the 2024/25 reporting year are:

- The College participated in a peer review session organised by the Environmental Association for Universities and Colleges. It was noted that **only 50% of colleges are reporting on Procurement emissions**. This will be our 3rd year reporting on Procurement emissions.
- We have **reduced our gas consumption, which is our biggest emitter of CO2, by 19%** in comparison to the previous year.

- Our **electricity emissions are down 25%** from the previous year, however, largely to do with the grid becoming greener.
- **Water consumption has increased by 18%**, however previous figures were based on estimates. We plan to monitor water usage more closely along with gas and electricity.
- **Procurement emissions have increased by 10%**, however, the emissions are calculated based on spend which has included larger estate projects this year.

Further to the progress above, we are working on developing an action plan to ensure we are meeting key sustainability priorities across the College and will share this with you when available.

New Year, New You - Make a Pledge

Climate change isn't distant—it's happening here in Scotland. Warmer years, heavier rainfall, floods, heatwaves, and eroding coastlines are already affecting our lives. Globally, rising temperatures threaten food, water, and homes, while putting wildlife and ecosystems at risk.

You can make a difference. [Take your pledge today:](#)

- **Cut car journeys and walk or cycle more**
- **Reduce single-use plastics**
- **Eat less meat or reduce food waste**
- **Switch to renewable energy**

Every action counts!

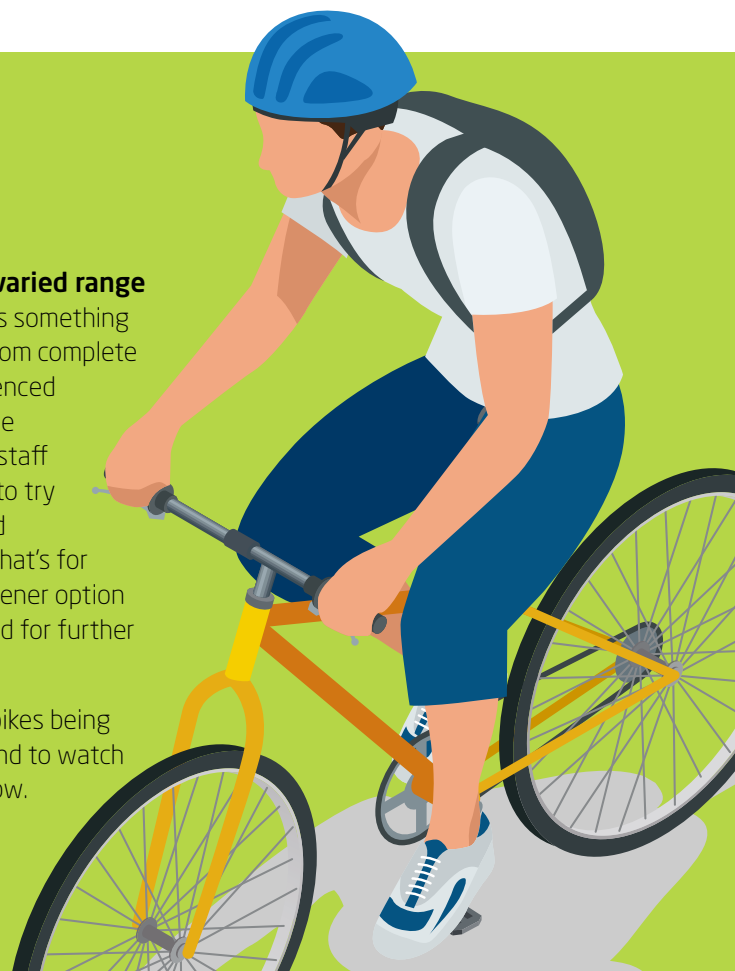
New Bikes

We are excited to announce that the College has successfully secured a grant from **Cycling UK**, which has enabled the Sport Department to purchase **20 brand new bicycles** for staff and students. This is a fantastic step forward in promoting active lifestyles, improving wellbeing, and encouraging more sustainable travel to and from college.

A huge thank you must go to **Archie Innes**, our Cycling Campus Coordinator, whose dedication and hard work was instrumental in securing this grant. Without his commitment and enthusiasm for cycling on campus, this opportunity would not have been possible.

The new fleet includes a **varied range of bikes**, ensuring there is something suitable for everyone — from complete beginners to more experienced cyclists. We're excited to be working on plans to offer staff and students the chance to try cycling in a supportive and accessible way, whether that's for leisure, fitness, or as a greener option for commuting. Stay tuned for further updates.

We can't wait to see the bikes being used across the College and to watch our cycling community grow.





Deposit Return Scheme

Over the past two years, **150 Childhood Practice students** at Clydebank have collected 12,000+ cans, turning them into £600 of Lidl vouchers to support the College Green Rooms.

As the Green Room now focuses on food and clothing vouchers for students in crisis, the Childcare team continues to put vouchers to good use by supporting the Breakfast of Champions campaign that the department runs. Each month, cans and bottles are recycled at Lidl

in exchange for vouchers, which fund essentials like tea, juice, and UHT milk—boosting their free breakfast offer.

The Win Win Recycling Bin Project demonstrates a whole college and wider community approach to sustainability. It encourages environmentally conscious behavior among students, aligns with global efforts to reduce landfill waste and contributes to Scotland's Net Zero target of reducing greenhouse gas emissions by 2045.

Sustainable Development Goal (SDG) Teach In Event - March 2026

The SDG Teach In is an annual international campaign delivered by [SOS-UK](#) which calls on educators to pledge to include the [UN Global Goals for Sustainable Development \(SDGs\)](#) in their teaching, training, and learning throughout March. Stay tuned for more details on how the College looks to get involved.



Green Gown Awards

The Green Gown Awards recognise the exceptional sustainability initiatives being undertaken by universities and colleges across the world. Applications for the 2026 Green Gown Awards UK & Ireland, **open early spring** so there's time for us to prepare.

Please get in touch if you have any sustainability initiatives or projects going on and I will be happy to assist with the application process. Lets get the recognition we deserve!

Marcelle McLaughlin
Sustainability Officer

Within the last 12 months, residents of West Dunbartonshire have saved:

8,838kg
of **CO₂**

These CO₂ savings are the equivalent of:

planting
354 trees



This figure is a direct result of individuals choosing to cycle rather than drive, as their main mode of transport.

168,004
miles

have been logged by users in West Dunbartonshire in the previous year. These rides have been for transport, leisure and fitness.

West College Clydebank have cycled over

4,000
miles

in the last year, and saved

1,354 lbs
of **CO₂**



Clothing Bank

We're excited to announce a new clothing bank at our **Paisley Campus** in partnership with Clyde Recycling, coming soon! It will be located behind the Renfrew building, next to the Enva bins.

Clyde Recycling has raised over £8 million for charities, protecting the environment while supporting communities nationwide. The College pays nothing to host the clothing bank

and will receive £150 per tonne of clothing (around 4 full bins).

Funds raised will help provide clothing and food vouchers for students in crisis and allow our Wellbeing Team to maintain a small stock of clothing, hygiene products, and essential food for urgent support.

Please donate your unwanted clothes—every item makes a difference!



Sustainability Portal

As a reminder, you can access useful information and links via the [Sustainability Portal](#) as well as annual reports and quarterly energy data. Please feel free to get in touch with the Sustainability Officer, Marcelle McLaughlin if you would like to promote good news stories etc via the portal.

The Environmental Association for Colleges and Universities (The EAUC)

The College is a member of the EAUC which helps to support colleges to embed sustainability within their plans and practices. The EAUC membership provides UK education institutions and companies access to a powerful network, exclusive resources, training, and policy influence, enabling them to advance sustainability in operations, curriculum, and research through peer support, specialised tools like the Sustainability Leadership Scorecard, networking via Communities of Practice, and discounted events, ultimately helping members meet goals and stay ahead in the evolving sustainability landscape.

For further information, please contact Matt Woodthorpe at mwoodthorpe@eauc.org.uk

Love to Ride - for West College Staff

[Love to Ride](#) is a free online platform designed to help more people cycle—whether it's for commuting, fitness, or fun. It offers personalised tips, easy ride tracking, and fun challenges to help you ride more often and with confidence.

Staff can [sign up for free](#) at lovetoride.net, download the app, and start logging rides to:

- **Take part in cycling challenges**
- **Track rides automatically**
- **Win prizes and earn badges**
- **Set personal goals and join groups**

Staff based at the Clydebank campus can take part in funded campaigns throughout the year, including Bike Month, Roll & Stroll, and Cycle September, with chances to win cash prizes and bike gear.

Staff at Paisley and Greenock campuses can also join for free, log rides, track progress, and win Love to Ride merchandise through the Scotland site.

Sign up today and be part of a greener, healthier campus.

For any queries, please contact Love to Ride's Community Engagement Manager, Brontë at bronte@lovetoride.net

LOVE TO RIDE

Corporate Development

Standing Items at every Meeting

Minutes of Previous Meeting
Schedule of Business
Internal Audit (Updates/Reports)
Comms & Mktg Update
IT & Digital Update
Finance Update
Estates & Projects Update
Sustainability Update
Procurement Approvals
People OD & HR Update
Risk Register
KPIs
SOFT updates

Summer Meeting (June)

Evaluation of Committee
Governance Compliance
EA Plan (next year)
IA Reports - Staff Utilisation

Corporate Reporting

Student

Learning & Teaching

Finance / Estate/Risk

Mgt Accts to April
Budget & Financial Forecast (next yr)

People:

Annual Updates

Modern Slavery Statement

Policies:

Strategies:

Progress on Strategies / Action Plans

Frameworks

Autumn Meeting (September)

Review of Remit / Membership / Dates of Mtngs

Governance:

IA Reports
Accounts Direction for SC / SFC Financial Forecast

Student

Learning & Teaching

IT Security / Controls Report (risks?)

Finance / Estate/Risk

Finance Update - including - year end position, Annual Review
Banking & Tax Arrangements, Budget & Financial Forecast Update

People:

HR & OD Annual Report

Annual Updates

Financial Regulations (ARC/CDC)
Health & Safety Policy
Public Interest Disclosure Policy (Sept 25)

Policies:

IT Admin Sec Policy (Sept 27)

Strategies:

Progress on Strategies / Action Plans

Winter Meeting (Nov / Dec)

Governance:

IAs: Student Credits/Funding

Corporate Reporting

Student

Compliance Report

Learning & Teaching

Finance / Estate/Risk

Mgt Accounts to October

People:

Annual Updates

H&S Annual Statement - CDC?
Procurement Annual Report (CDC)
Sustainability Update (gov Audit)

Policies:

Progress on Strategies / Action Plans

Strategies:

Spring Meeting (March)

Additional Items

Governance:

IA reports: Staff Rec & Ret; Procurement & Contract Mgt; Financial
Controls: Info Sec & IT Cyber Risk

Corporate Reporting

Students

Learning & Teaching

Finance / Estate/Risk

Management Accounts to January
Budget 2024/2025 and Financial Forecast Update (draft)
Sustainability Update
Purchase Orders > £50

People:

Annual Updates

Annual Carbon Emissions Return
Equality Mainstreaming Report
Dec & Mgt Interest (May 26)
Records Mgt Policy (Mar 26)
Data Protection (Mar 26)

Policies:

Strategies:

Progress on Strategies / Action Plans