

Azets 2021 Report Recommendations Update

Az-22
Ref 23-22

May 21 Report Ref	Recommendation	Management Response/Actions	Action Owner	Original timescale	Status at 7 APR 2022	South Lanarkshire College Management updates as at 24 March 2022	Expected Completion Date
	HR & Finance Policies Ensure that all relevant HR and financial policies and procedures are current, are understood and accessible to staff and stakeholders.	The college has a wide range of policies in place, which are fit for purpose if applied appropriately, and all organisations these are updated and reviewed on a regular basis. HR and financial policies are being reviewed using an assessment on the Employee Experience. From a Whistleblower and Complaints approach, once the process is reviewed, appropriate policies and staff will be made available for all employees including the visibility and accessibility of resources, training, policies and procedures. There are approx. 20 Finance procedures currently on the College portal. There is a review currently underway to ensure that all are current, including a complete review of the Financial Regulations (which makes reference to policies and procedures and which has not been updated since 2013).	Head of HR, Head of Finance	2021-22	Partly completed	Code of Conduct and 5 staff employee policies and procedures are being progressed through review stages. Current Whistleblowing, Grievance and Disciplinary at Work policies are in place and will be updated in the coming months. The Complaints Procedure (for non-employees) is already in place. The initial review of all policies and procedures, including those of Finance, took place in February 2022 and each Dept Head has to formulate a timetable for the review of its own policies and procedures to March 2022. The timetable will focus on the more pertinent issues as a matter of priority.	Jun-22
18	Student withdrawals A formal and definitive process for withdrawing students should be designed, based on defined metrics. On the rare occasion they are not applicable, a brief business case should be made and approved by senior staff.	The college has to strictly adhere to the Scottish Funding Council's funding rules and as such sends data to the SFC every month and then completes a final return for funding and checking. The issue of a student allegedly not being withdrawn in a timely basis was referred to the construction area. There is a system in place for withdrawing students. The college has a good track record for the management of bursary payments, for example payments for students on full time courses are automatically stopped after 6 weeks of non-attendance in line with Scottish Funding Council regulations. There is a bursary appeals panel that meets to discuss any reinstatement of bursary payments, again which follow national guidance. To reinforce the legality and the importance of appropriate register completion the following is being done: 1) Review and refresh all teaching staff of acceptable register marks, and that registers should be marked when the class is taking place. 2) All Finance Principals must approve all student withdrawals. 3) Associate Principal of Construction is reviewing the set up of Construction courses.	Depute Principal Associate Principal for Construction	Aug 2021 Aug 2021	Complete	1 Reminder of register marks sent to curriculum staff by MS at the start of the academic year. All teaching staff have been reminded that registers are legal documents and must be kept up to date. Work was undertaken to cleanse and check data as part of the November staffing dates by MS. FES returns are submitted to the SFC when allowed data to be checked on a monthly basis. The FES funding returns are audited on the final submission of the year for the controls that are in place for checking attendance and withdrawal process. As of October 2021 the college had a clean audit, therefore all controls are being followed to the expectation of the funding guidance. 2 All Associate Principals authorize withdrawals. 3 New curriculum planning tool using Power BI was set up for the 2021-22 academic year. All courses, teaching and revised hours are updated into this to understand teaching hours required in each curriculum area and college as a whole. The new Associate Principal for Construction has reviewed courses and timetables with regular checks in place.	
19	Handling of sensitive information Ensure the IT devices and the Data Protection Officer to provide relevant advice to the college regarding any handling of sensitive information. The college website also a dedicated area for data protection. The college has a thorough online mandatory induction which includes data protection and GDPR, and also introduces staff to the IT Code of Conduct (Acceptable Use Policy). The college has robust systems in place such as authentication monitoring, internet traffic monitoring and adheres to cybersecurity protocols and compliance standards. This enables the college to ensure that the Acceptable Use Policy is adhered to. All staff to be reminded of the IT Code of Conduct (Acceptable Use Policy).	The college is part of HERETIS (HE/FE Shared Technology and Information Resources) and has a Data Protection Officer to provide relevant advice to the college regarding any handling of sensitive information. The college website also a dedicated area for data protection. The college has a thorough online mandatory induction which includes data protection and GDPR, and also introduces staff to the IT Code of Conduct (Acceptable Use Policy). The college has robust systems in place such as authentication monitoring, internet traffic monitoring and adheres to cybersecurity protocols and compliance standards. This enables the college to ensure that the Acceptable Use Policy is adhered to. All staff to be reminded of the IT Code of Conduct (Acceptable Use Policy).	Depute Principal	Aug 2021	Complete	All staff when signing into their SLG desktops, daily, must accept the Internet, Intranet and Email Accessible Use Policy which stays on their screens until "login" is closed. Completed.	
19v	Handling of sensitive information Ensure all staff are trained in data protection and GDPR.	While there are appropriate training materials in place, the college as part of its review of all training requirements, including mandatory training requirements, is looking to further improve these. This will likely include training of data protection and GDPR, in consultation with the Data Protection Officer.	Head of HR	Jun-22	Ongoing		Jun-22
19v	Code of conduct The policies and procedures around conduct should be considered to ensure they are current and visible to all staff.	The college currently has an Employee Competence manual, and this along with a range of other guidance documents for staff, clearly sets out how staff should conduct themselves. However, further work is being done to review and enhance this manual, which will be reviewed and signed off by the Trade Unions, Leadership Team and HR Committee.	Head of HR	Aug 2021	Ongoing	Drafted and currently being reviewed	Jun-22
20	A formal review of relevant policies to ensure consistency, that they are fit for purpose and ensure best value. This should include advice to staff on reporting discrepancies and include user training on procurement rules. In the event that these are not applicable, a brief business case should be made and approved by staff.	The college is in the process of reviewing all procurement policies and procedures and has appropriate assistance and guidance from AP/UC, via the College's Supply Chain Manager. Training sessions have been delivered to all budget holders and middle management. There is still work to be done on (for example) ensuring that rules are followed, resulting in fewer purchase orders being rejected. Training sessions will be delivered in Aug 2021 and annually thereafter.	Head of Finance	Aug 2021	Partially complete	The College Supply Chain Manager is progressing with a full review of procurement procedures and this will form part of a separate section on the College's portal website which will be available to all staff.	June 2022
20i	A formal review of relevant policies to ensure consistency, that they are fit for purpose and ensure best value. This should include advice to staff on reporting discrepancies and include user training on procurement rules. In the event that these are not applicable, a brief business case should be made and approved by staff.	The college is in the process of reviewing all procurement policies and procedures and has appropriate assistance and guidance from AP/UC, via the College's Supply Chain Manager. Training sessions have been delivered to all budget holders and middle management. However, procurement thresholds should be amended and notified internally. Procurement thresholds more accurately reflecting current spend and guidance were reviewed internally with the recommendations for change being agreed at the Finance & Resources Committee in Feb 2022.	Head of Finance	Aug 2021	Complete	Requests for capital and other large investments (i.e. greater than £10k) are now formally presented to the College Leadership Team for review and approval. Procurement thresholds more accurately reflecting current spend and guidance were reviewed internally with the recommendations for change being agreed at the Finance & Resources Committee in Feb 2022.	
21	Mandatory annual training on bribery and supplier entertaining should be provided to staff.	The college has Anti Bribery Policy and Procedures, which clearly set out the college and the legal position on preventing and prohibiting bribery in accordance with the Bribery Act 2010. It is not adhered to then HR procedures would be followed for referred to the police as appropriate. Action: Provide refresher training on the Anti Bribery Policy and Procedures.	Head of Finance to update policies Thereafter, liaise with HR on delivery of training.	Aug 2021	Partially completed	It is College policy that staff do not accept any hospitality and this will be reinforced through a training session for all senior staff; this will involve them instructing their own staff accordingly.	Session arranged with CLT for early April 2022
22	Creation of a combined supplier list so that quotes can be requested on a basis for specific departments. On the rare occasion quotes are not applicable, a brief business case should be made and approved by senior staff.	Training sessions will be delivered in Aug 2021 and annually thereafter.	Head of Finance	Dec 2021 then ongoing process	Complete	The college has an updated contract register on the AP/UC "Market" portal and this is being updated as each new contract is agreed. Importantly, this updating is part of a formal process that the Supply Chain Manager keeps current.	N/A
4	Stock control systems should be implemented for each faculty and should be normalised and on a shared channel (with permission for access). There are inconsistent approaches across departments and, in some cases, no procedures.	The finance team works with areas to assign non pay budgets on an annual basis, which is carefully monitored. However, more could be done to create a standardised approach to stock control systems. 1) Review and refresh standard procedures to stock control.	Head of Finance	Sep 2021	Ongoing	There are technicians in curriculum areas across the college which monitor restricted access stock rooms. However, more formal standardised procedures for stock control, tailored for each area, will be in draft form for internal review by May 2022. There are finance processes in place which are able to check and review all spending, any ordering of stock goes through stringent processes and orders are signed off at senior management level. As such, if there are any unusual "spikes" in spending in any area in the college this would be picked up in addition, stock control is subject to internal audit.	May-22
5	Formalised scrap procedures should be put in place. There is evidence of some positive procedures in place for scrap or copper piping which are understood and the money received centrally by SLG.	The college will introduce procedures for asset management and disposal, including the sale of scrap which will form part of the Aug/ Sept series of training sessions on procurement.	Head of Finance	Aug 2021	Partially complete	The college's existing procedures for the sale of scrap have been refreshed and will be presented to the CLT as part of the current review of all procedures.	Session arranged with CLT for early April 2022
6	Perform a due diligence process for suppliers. This should include an approved supplier listing with declarations of interest required by relevant staff engaging with the suppliers.	The college current has almost 1000 "live" suppliers, ranging from annual spends of £100 to £50k and performing due diligence retrospectively on these would be unfeasible. However, the "New Supplier" form, completed by staff since 2016, does have a section which asks the requester to confirm that they do not have what could be considered as a conflict of interest with the company. The arrangement will be emphasised at the procurement training sessions. All management will be required to sign an annual declaration stating that they have not been involved in any actions which could be considered as being interpreted as generating conflict of interest and they will be required to sign an annual declaration of interest register.	Head of Finance	Dec 2021	Partially complete	All budget holders and those who initiate purchases will have to sign a Conflict of Interest form which will be circulated in March 2022 following its review at CLT.	This will form part of the session arranged for the CLT in early April 2022
6i	Perform a due diligence process for suppliers. This should include an approved supplier listing with declarations of interest required by relevant staff engaging with the suppliers.	The college current has almost 1000 "live" suppliers, ranging from annual spends of £100 to £50k and performing due diligence retrospectively on these would be unfeasible. However, the "New Supplier" form, completed by staff since 2016, does have a section which asks the requester to confirm that they do not have what could be considered as a conflict of interest with the company. The arrangement will be emphasised at the procurement training sessions.	Head of Finance	Feb-22	Complete	All New Supplier Request Forms now (since Feb 2022) go through the College's Supply Chain Manager who undertakes a due diligence review.	
7	A register and confirmation of fees/bills, signed by suppliers, should be recorded. This will help the College also understand the level of free supplies they receive. Introduce a gifts and hospitality register.	A "freelance" register will be set up and subject to management review. The College has a gifts and hospitality register, and an anti bribery policy - both procedures require to be updated and there is a need for staff development.	Head of Finance	Sep 2021	Complete	In January, the College introduced its register for (a) the receipt of free issues and (b) the supply of free issues. It is the responsibility of all department and Faculty heads to ensure that this register is updated as and when potential additions to it arise. The registers are monitored by the Head of Finance. The College does have a gifts and hospitality register but staff will be reminded of their requirements in this regard.	Complete. This will form part of the session arranged for the CLT in early April 2022.
8	Assets should, where appropriate, be marked with a unique tag when purchased and periodic inventory checks should be conducted by someone external to the department.	The College does have an asset tagging system already, maintained by the Estates Department. Most assets have a bar code attached and are on a centralised asset register. The arrangements required due to the COVID means that assets have been marked around the College and an audit will be undertaken once the situation is more settled.	Head of Estates / Head of IT / Head of Finance	Jan 2022	Complete	All IT assets are tagged electronically and can be disabled if reported stolen or lost.	
8i	Assets should, where appropriate, be marked with a unique tag when purchased and periodic inventory checks should be conducted by someone external to the department.	The College does have an asset tagging system already, maintained by the Estates Department. Most assets have a bar code attached and are on a centralised asset register. The arrangements required due to the COVID means that assets have been marked around the College and an audit will be undertaken once the situation is more settled.	Head of Estates / Head of IT / Head of Finance	Oct-22	Ongoing	As is mentioned in the Management response, the College does have an asset tagging system. Due to COVID-19, with assets moved and stored in lieu of being where they would normally be, it is not feasible to undertake an asset stocktake at this time. Finance processes are robust.	Oct-22
9	A formal process for booking out college vehicles with justifications required, covering College expenses.	Set up an electronic process for the formal booking out of college vehicles, which can be audited and checked.	Depute Principal	Dec 2021	Complete	The College now has a system for registering the use of vehicles.	N/A
10	The Principals could sign off large expenditure over a certain threshold, with other senior staff allowed to approve expenditure up to specified limits.	The Principal approves all purchase requisitions, with the Head of Finance approving all those over £10,000 prior to those going to the Principal. This arrangement will be reviewed during the 2021/22 financial year to ensure compliance.	Head of Finance	Jan 2022	Complete	All purchase requisitions are authorised by either the Principal or the Depute Principal. Additionally, all purchases over £10,000 automatically go to the Head of Finance for an additional level of scrutiny and approval.	N/A
11	A delegated limit of authority should be implemented, indicating approval amounts and level of approval required.	The College does have a limit of authority but this is to be reviewed prior to the start of the new financial year.	Head of Finance	July 2021	Complete	A refreshed set of procurement thresholds was presented to the Finance and Resources Committee in Feb 2022 and was approved. This had previously been reviewed and accepted by the College Leadership Team. This incorporates levels of authority.	N/A
12	Timetabling Perform regular internal reviews of timetabling, including checking directly with students about attendance. Make it clear to lecturers of the importance of accurate timetabling and impose repercussions. The new curriculum planning tool allowing for all planned teaching hours to be calculated for all areas to be developed.	The college has a robust timetabling system, and follows nationally agreed terms and conditions for timetabling teaching hours. Anomalies relating to timetabling were confined to the Faculty of Construction only. The new Associate Principal of Construction is going to conduct a review of all course and lecture timetabling in the faculty.	Associate Principal of Construction Depute Principal	Oct 2021 March 2022	Complete	1 The Associate Principal for Construction has worked with the team to check and review all timetables as well as plan courses for this and next academic years. 2 The new curriculum planning tools allow for all teaching hours to be closely planned and monitored both by curriculum areas and MS. This is how budgets are set. Any over or under staffing would be picked up as part of finance processes.	N/A
13	Security SLG should consider all storerooms having electronic Maglock doors so that access can be monitored.	The college has always had storerooms which have both electronic and manual locks in use. Further checks are being made to ensure access is given to only those who require it.	Associate Principal of Construction	Nov 21	Complete	Only those who require access, such as technicians, for those areas are able to enter the storerooms.	N/A
14	Security CCTV cameras should be clearly located in areas susceptible to theft taking place, e.g. storerooms. Dummy CCTV or portable CCTV may have a deterrent effect.	The college campus has always had CCTV cameras installed as part of its security measures. The integrity as part of its building maintenance fund has progressively been replaced installing CCTV cameras which have improved definition in key areas.	Depute Principal	Nov 2021	Complete	The College has increased its stock of CCTV cameras via Backlog Maintenance (BMC) contracts. The integrity and quality of the cameras has substantially improved and they also cover a much wider area.	N/A
15	Work towards implementing consistent budgets across faculties / departments and monitor this regularly.	Budgeting has been rolled out to all departments during the 2020-21 year, with the College employing dedicated temporary support to assist in its implementation. It will be reported to SLT on a regular basis any large levels of expenditure or fluctuations, in spend and a formal review of spend by supplier and department will be introduced.	Head of Finance	2021	Partially completed	Following a pilot involving an agency staff member, the College has identified the need for a permanent member of staff to work with the senior Finance Dept staff and all budget holders to address the monitoring and control of budgets and budget reporting. This staff member will also be involved in the development and production of enhanced management information. The College has also purchased an enhanced financial software package and the new member of staff will have the roll out of this software and its development as part of their remit.	Appointment target date - mid April 2022. May / June 2022 Staff development in May & June 2022
16	Where possible, students should require evidence of funding prior to attending classes. A formal process for fee waiver should be introduced.	There is a college policy however it could be applied more consistently. We will continue to work with the Finance Department to ensure the buy in of staff who serve the students. Finance Department will consider how to improve our approach to debt collection. The College will introduce improved staff awareness to ensure the SFC fee waiver policy is adhered to.	Head of Finance	2021	Partially completed	The College does have an existing fee waiver policy. However, there may be some instances where this isn't completely enforced. Sessions will be run with appropriate staff to reinforce the College policy. The pandemic has resulted in many fewer students attending in person and thus it is more difficult to enforce the procedures and for checks to be made on supporting documentation. The College does, though, have more stringent procedures to follow up where students claim that they are fee waivers and the monitoring of this will be refined and enhanced for the start of the 2022/23 session.	Staff development sessions - August 2022. Procedures notes will be made more accessible to both staff and students - June 2022.