

## Board of Management Audit & Assurance Committee

<b>Date of Meeting</b>	<b>Wednesday 27 November 2024</b>
<b>Paper No.</b>	<b>AAC2-D</b>
<b>Agenda Item</b>	<b>5.4.1</b>
<b>Subject of Paper</b>	<b>Internal Audit Report – Student Activity Data 2023-24</b>
<b>FOISA Status</b>	<b>Disclosable</b>
<b>Primary Contact</b>	<b>Henderson Loggie</b>
<b>Date of production</b>	<b>23 October 2024</b>
<b>Action</b>	<b>For Discussion and Decision</b>

### 1. Recommendations

The Committee is asked to consider and discuss the report and the management responses to the internal audit recommendations.

## **2. Purpose of report**

The purpose of this review is to provide management and the Audit and Assurance Committee with assurance on key controls relating to the curriculum and financial plans in place for City of Glasgow College and their alignment with the regional plan for Glasgow and the college student number targets.

## **3. Key Insights**

This internal audit of Student Activity Data for 2023-24 provides an outline of the objectives, scope, findings. The Committee is asked to note the internal audit opinion that:

- the student data returns have been compiled in accordance with all relevant guidance.
- adequate procedures are in place to ensure the accurate collection and recording of the data; and
- we can provide reasonable assurance that the FES return is free from material misstatements.

## **4. Impact and implications**

Refer to internal audit report.

# City of Glasgow College

**2023/24 Student Activity Data**

**Internal Audit report No: 2024/13**

**Draft issued: 17 October 2024**

**Final issued: 23 October 2024**



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# Management Summary

## Introduction

The Guidance Notes issued by the Scottish Funding Council (SFC) on 27 August 2024, '*FES Return and Audit Guidance 2023-24*' requested submission by City of Glasgow College ('the College') of the FES return for session 2023/24, which includes the Credits data relating to College activity for the academic year 2023/24.

Guidance on completion of the 2023/24 return was issued by the SFC on 12 June 2023.

The Credits Audit Guidance requests that colleges obtain from their auditors their independent opinion on the accuracy of the FES return.

## Scope of the Audit

In accordance with the Credits Audit Guidance we reviewed and recorded the systems and procedures used by the College in compiling the returns and assessed and tested their adequacy. We carried out further detailed testing, as necessary, to enable us to conclude that the systems and procedures were working satisfactorily as described to us.

Detailed analytical review was carried out, including a comparison with last year's data, obtaining explanations for significant variations by Price Group.

Our testing was designed to cover the key risk areas identified at Annex C to Credits Audit Guidance.

## Audit Staffing

An Audit Director with 31 years' experience in the further and higher education sectors had overall responsibility for the planning, control and conduct of the audit and supervised and reviewed work performed by a Senior Auditor and Auditor with six and one-years' experience in the sector respectively. A Senior Manager with 19 years' experience in the sector was also involved at the planning, review and reporting stage.

The quality of audit work undertaken by the firm is enhanced through continuous review of procedures and the implementation of individual training programmes designed to address the needs of each team member.

The total number of audit days was 8, split ½ day for the Audit Director, ½ day for the Senior Manager, 4½ days for the Senior Auditor and 2½ days for the Auditor.

## Audit Findings

The points that we would like to bring to your attention have been grouped together under the following headings to aid your consideration of them:

- Introduction
- Systems and Procedures for Compilation of Returns
- Analytical Review

The action that we consider necessary on each issue is highlighted in the text for clarity and an action plan for implementation of these recommendations can be found in section 2.



### Audit Findings (continued)

To aid the use of the action plan, our recommendations have been graded to denote the level of importance that should be given to each one. These gradings are as follows:

<b>Priority 1</b>	Issue subjecting the College to material risk and which requires to be brought to the attention of management and the Audit and Assurance Committee.
<b>Priority 2</b>	Issue subjecting the College to significant risk and which should be addressed by management.
<b>Priority 3</b>	Matters subjecting the College to minor risk or which, if addressed, will enhance efficiency and effectiveness.

### Conclusion

Our report was submitted to the SFC on 9 October 2024. We reported that, in our opinion:

- the student data returns have been compiled in accordance with all relevant guidance.
- adequate procedures are in place to ensure the accurate collection and recording of the data; and
- we can provide reasonable assurance that the FES return is free from material misstatements.

A copy of our Audit Certificate is included at Appendix I to this report.

### Acknowledgments

We would like to take this opportunity to thank the staff at the College who helped us during our audit review.



## Action Plan

Para Ref.	Recommendation	Grade	Comments	Agreed Y/N	Responsible Officer for Action	Agreed Completion Date
2.2.1 – 2.2.3	<p><b>Systems and Procedures for Compilation of Returns</b></p> <p><b>Allocation of Credits to Courses</b></p> <p><b>R1</b> For all College rated units, the College should ensure that adequate supporting evidence is available for planned learning hours to verify the Credits claim.</p>	3	<p>Supporting evidence by way of timetables and Scheme of Work are available for college devised units. The exception in this instance was guidance for an HE PT evening course. Guidance is not routinely offered on such courses but targeted. Communication will be issued to faculties to remind Curriculum Head's that all guidance must be timetabled.</p>	Yes	Maddy Green, Associate Director Student MIS	31 October 2024



# Main Report

## 1. Introduction

### 1.1 SFC Guidance

1.1.1 The Credits Audit Guidance issued by the Scottish Funding Council (SFC) on 27 August 2024 sets out, at Annex C, the key risk areas in relation to the preparation of the FES return. These are:

- the average Credits claimed for full-time students exceeds levels indicated in the Credit guidance;
- incorrect Credit value is claimed for collaborative provision;
- claims for fee waivers and students with multiple enrolments;
- spanning courses;
- identification of non-fundable activity, both courses and students, including capturing of eligible enrolments and identification and recording of student withdrawals;
- recording of progress for students on open / distance learning programmes;
- identification and counting of infill students; and
- claims for non-accredited work experience / placement.

1.1.2 For academic year 2023/24 we established that there had been no significant changes to the systems and procedures used in the compilation of the returns. We then carried out detailed testing, as necessary, to enable us to conclude that the systems and procedures were working satisfactorily. Detailed analytical review was carried out, including a comparison with last year's data, and obtaining explanations for significant variations by Price Group.

1.1.3 As requested by the Credits Audit Guidance this report indicates: the scope of the audit; the approach taken; an indication of analytical review work performed; the extent of checking undertaken; review of prior year recommendations; and the main findings from our audit work. As requested by the guidance, the report also includes a summary of adjusted and unadjusted errors found during the course of the audit.





### 2. Systems and Procedures for Compilation of Returns

#### 2.1 Introduction

- 2.1.1 Detailed testing at the year-end Credits audit included two main tests on courses and individual students.
- 2.1.2 The following tests were carried out for a sample of 16 courses selected from the UNIT-e system:
- Ensured that the course met the criteria for fundable activity set out in the Credits guidance.
  - Where applicable, ensured that the course met the definition of further or higher education set out in the Credits guidance.
  - Ensured that courses recorded as full-time met the definition for full-time as set out in the Credits guidance.
  - Checked the student total for a programme against course / class lists or course / class register. Checked calculation of the required date and ensured that students who had withdrawn prior to this date had been excluded from the Credits count; and
  - Checked allocation of Credits to courses is in accordance with the Credits guidance and, where Credits were claimed beyond normal full-time levels, that the claims could be appropriately justified by the College.
- 2.1.3 For a total of 67 students selected from the above courses the following tests were carried out, where applicable:
- Ensured that the student met the criteria for fundable activity set out in the Credits guidance.
  - Checked back to signed enrolment forms, or electronic equivalent, for the 2023/24 academic year.
  - For infill courses, ensured that Credits were allocated according to the modules attended by individual students rather than by the default value for the courses being infilled.
  - Checked to student attendance / engagement records and, for withdrawals, checked that the withdrawal date noted on the system was the last date of physical attendance or engagement;
  - For students following courses of open / distance learning vouched to study plan etc. and ensured that required criteria was met; and
  - For students undertaking non-accredited work experience / placement ensured that the Credits value had been calculated in line with the Credits guidance.
- 2.1.4 The following tests were carried out by reviewing records for all College courses:
- Compared the overall average Credits per full-time student against the SFC expected average of 17 Credits for full-time Further Education students and 15 Credits for full-time Higher Education students;
  - Confirmed that there were no claims for more than one full-time enrolment per student for 2023/24 and ensured that Credits had not been claimed in respect of courses that were related in respect of subject area, unless progression could be clearly established;
  - Confirmed that there were no claims for overseas students and students enrolled on full cost recovery commercial courses; and
  - Confirmed that Credits for spanning courses were claimed in the correct year.
- 2.1.5 We reviewed the systems for recording fee waiver entitlement and carried out an analytical review to ensure the accuracy of the fee waiver element of the FES return. For a random sample of 10 part-time students, we confirmed that College staff had verified the entitlement to benefit.
- 2.1.6 Before signing our audit certificate, we reviewed the final FES online report and the explanations for remaining errors.



### 2. Systems and Procedures for Compilation of Returns (continued)

#### 2.1 Introduction (continued)

- 2.1.7 From our review and testing of the systems and procedures used in the compilation of the returns, we concluded that overall, they were adequate to minimise risk in the areas identified in Annex C of the Credits Audit Guidance and were working satisfactorily as described to us.
- 2.1.8 The remainder of this section discusses issues identified during our review of the 2023/24 student activity data.

#### 2.2 Allocation of Credits to Courses

- 2.2.1 The Credit Guidance states that for programmes containing a mix of credits (Scottish Qualifications Authority (SQA) or other awarding body) and other activity, the Credit claim should be based on the total Credits plus the planned learning hours divided by 40 (1 credit = 40 learning hours) for the non-credited units. Planned learning hours should represent a realistic and sensible estimation of the number of hours that students will normally be required to undertake in their programme of learning. Examples of what may be counted as planned learning hours include: Class contact time; Supported study time; Supported learning; Tutorial time; and any additional time which the College requires for delivering the course and / or supporting the student (e.g. assessment time).
- 2.2.2 For one course in our sample, HNC Childhood Practice (Evening), no supporting evidence was available to verify the claim of one Credit per student for a College rated Guidance: Care unit. There were no timetabled hours for this unit and management noted that one Credit was claimed as is custom by the sector. While guidance is carried out, this is typically via one-to-one meetings and therefore cannot be verified. Guidance is normally timetabled for full-time students however these students were part-time on placement in a care setting and guidance is normally provided by appointment.
- 2.2.3 There were 13 eligible students on this course, and we have noted the 13 Credits for this unit as an unadjusted error due to lack of supporting evidence.

#### **Recommendation**

**R1 For all College rated units, the College should ensure that adequate supporting evidence is available for planned learning hours to verify the Credits claim.**

#### 2.3 Work-Based Learning

- 2.3.1 During testing of a work-based learning course, SVQ Social Services and Healthcare (Level 2), evidence of engagement was not available for four of the five sampled students. The College then reviewed the wider population and determined a further five students were also impacted. This was due to a process error in which students should be automatically excluded and then manually included as evidence of engagement is available, however they were automatically included in error. The College reviewed all work-based learning courses and determined no others were impacted by the error and processes will be implemented to ensure this does not happen in future. Management noted that this was a new process and more training was required. As action has already been taken to address this issue in the current year no further recommendation has been made. A total of 44 Credits were removed for the final claim.



### 2. Systems and Procedures for Compilation of Returns (continued)

#### 2.4 Infill

- 2.4.1 For an infill course in our sample, HN Units Electrical, for two of the three students in our sample, we found that there was an underclaim of a total of four Credits in terms of the units that the students had undertaken.
- 2.4.2 The College also found that, for the two non-sampled students on the course, there were claims of two additional Credits each in error. This was due to both students being incorrectly enrolled on two units twice. A further review was undertaken by the College, checking the full data set of infill students and it was found that there was one more occurrence of this error of two Credits for a student on HN Units Marine Engineering (Infill).
- 2.4.3 The above nets to a small two Credit overclaim which we have noted as an unadjusted error.
- 2.4.4 From further discussion, College management noted that a robust process exists to check infill Credits prior to the final FES submission. Mitigating circumstances due to industrial action in session 2023/24 meant that a faculty had made late changes to infill Credits one day before the audited FES return was prepared. Typically, the session data would not be changing at this point, and all data checking processes would be complete and signed-off. On this basis, and given the minor impact on the Credits claim, we concurred with management that no further action is required, and the issue would not be reoccurring.

### 3. Analytical Review

- 3.1 The analytical review by Price Group for the current year, included at Appendix III of this report, showed significant variances in Price Groups 1, 2, 3 and 5. These were discussed with College management. The explanations we received provided us with additional assurance that the Credits claim does not contain material errors. The College's credits target reduced from 175,333 in 2022/23 to 157,800 in 2023/24, a reduction of 10%. As a result, there has been a significant drop in enrolments across all Price Groups, which was mainly due to a drop in part-time Further Education provision.



## Appendix I – Copy of Audit Certificate

City of Glasgow College  
City Campus  
190 Cathedral Street  
Glasgow  
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9 October 2024

To Whom it May Concern

### **Auditor's Report to the Members of the Board of Management of City of Glasgow College**

We have audited the FES return which has been prepared by City of Glasgow College under SFC's Credit Guidance for colleges issued 12 June 2023 and which has been confirmed as being free from material misstatement by the College's Principal in his Certificate dated 9 October 2024. We conducted our audit in accordance with the 2023-24 audit guidance for colleges. The audit included an examination of the procedures and controls relevant to the collection and recording of student data. We evaluated the adequacy of these controls in ensuring the accuracy of the data. It also included examination of evidence relevant to the figures recorded in the student data returns. We obtained sufficient evidence to give us reasonable assurance that the returns are free from material misstatements.

In our opinion:

- the student data returns have been compiled in accordance with all relevant guidance;
- adequate procedures are in place to ensure the accurate collection and recording of the data; and
- we can provide reasonable assurance that the FES return is free from material misstatements.

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Stuart Inglis  
Director  
For and on behalf of Henderson Loggie LLP  
Chartered Accountants  
Dundee Office  
stuart.inglis@hlca.co.uk

9 October 2024

Date FES returned: 4 October 2024



Appendix II – Summary of Adjusted and Unadjusted Errors

Report Para	Error identified	Adjusted/unadjusted	Approx. Value
2.2.3	Lack of supporting evidence for a College rated unit	Unadjusted	-13 Credits
2.3.1	Evidence of engagement not available for nine students on a work-based learning course	Adjusted	-44 Credits
2.4.1 & 2.4.2	Credits for infill students not in agreement with the units taken	Unadjusted	-2 Credits



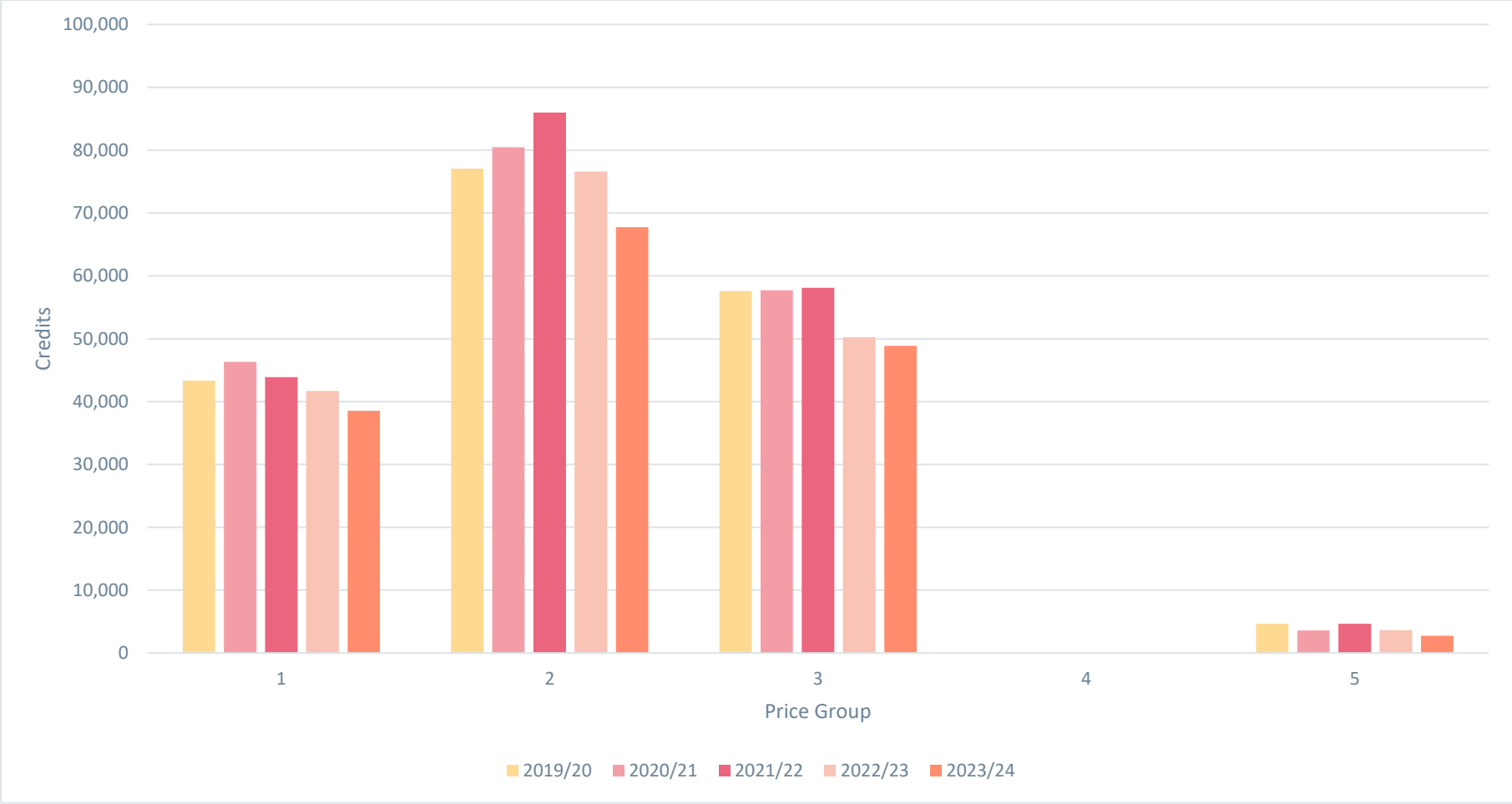
Appendix III – Price Group Analytical Review 2022/23 and 2023/24 – Figures

Price Group	2022/2023		2023/2024		Variance	Variance
	Credits		Credits		Credits	%
1	41,676		38,543		(3,133)	(7.5)
2	76,613		67,742		(8,871)	(11.6)
3	50,227		48,877		(1,350)	(2.7)
4	0		0		0	0
5	3,638		2,754		(884)	(24.3)
	<b>172,154</b>		<b>157,916</b>		<b>(14,238)</b>	<b>(8.3)</b>

College Funded Target 2023/24: 157,800 Credits



Appendix IV – Price Group Analytical Review 2019/20 to 2023/24 – Graph



## Appendix V – Updated Action Plan – Student Activity Data 2022/23

Recommendation	Grade	Comments	Agreed Y/N	Responsible Officer For Action	Agreed Completion Date	Progress at October 2024
<p><b>Systems and Procedures for Compilation of Returns</b></p> <p><b>Collaborative Provision</b></p> <p><b>R1</b> Ensure that all student activity relating to higher education articulation programmes is identified in the FES and nil Credits claimed in line with the requirements of the Credits guidance.</p>	3	A Process and Procedure Review has been requested on how Partnership Agreements within the College are recorded and communicated to stakeholders, including student records.	Yes	Associate Director Student MIS	31 March 2024	<p>This issue related to BSc Sports Rehabilitation where Credits had been claimed in error for 2022/23. No Credits were claimed for this course in 2023/24 and there were no other similar courses.</p> <p><b><i>Fully Implemented</i></b></p>
<p><b>Classification of Programmes / Fee Waiver</b></p> <p><b>R2</b> Ensure that as part of the College's in-year FES data integrity checks student source of funding codes are checked for accuracy.</p>	2	Our workflow for in year checks has been reviewed and updated.	Yes	Associate Director Student MIS	31 March 2024	<p>No issues were noted with student source of funding in our testing for 2023/24.</p> <p><b><i>Fully Implemented</i></b></p>





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