

Glasgow Kelvin College

Follow Up Reviews 2022/23

Internal Audit report No: 2023/07

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Management Summary

Introduction and Background

As part of the Internal Audit programme at Glasgow Kelvin College ('the College') for 2022/23 we carried out a follow-up review of the recommendations made in Internal Audit reports issued during 2021/22 and reports from earlier years where previous follow-up identified recommendations outstanding. These were:

- Internal Audit Report 2022/03 – Publicity and Communications;
- Internal Audit Report 2022/05 – Estates Strategy & Capital Projects;
- Internal Audit Report 2022/08 – Follow-Up Reviews 2021/22;
- Internal Audit Report 2022/10 – Asset and Fleet Management; and
- Internal Audit Report 2022/11 – 2021/22 Student Activity Data.

Reports 2022/01 – Annual Plan, 2022/02 – Student Support, 2022/04 – Data Protection, 2022/06 – Performance Reporting / KPIs, 2022/07 – Quality Assurance, 2022/09 – Annual Report and 2022/12 – 2021/22 Student Support Funds did not contain an action plan and therefore no follow-up activity was required for these specific reports as part of this review.

Audit Scope and Objectives

The objective of our follow-up review was to assess whether recommendations made in previous reports have been appropriately implemented and to ensure that, where little or no progress has been made towards implementation, that plans are in place to progress them.

Audit Approach

For the recommendations made in each of the reports listed above we ascertained by enquiry and review of supporting documentation, as appropriate, whether they had been completed or what stage they had reached in terms of completion and whether the due date needed to be revised.

Action plans from the original reports, updated to include a column for progress made to date, are appended to this report.

Overall Conclusion

The College has made excellent progress in implementing the recommendations followed-up as part of this review, with overall 18 (95%) of the 19 recommendations followed-up being assessed as 'fully implemented'. One recommendation was assessed as 'partially implemented'.



Overall Conclusion (continued)

Our findings from each of the follow-up reviews has been summarised below:

From Original Reports			From Follow-Up Work Performed				
Area	Rec. Priority	Number Agreed	Fully Implem-ented	Partially Implem-ented	Little or No Progress Made	Not Past Agreed Completion Date	Considered But Not Implemented
2022/03 - Publicity and Communications	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	1	1	-	-	-	-
Total		1	1	-	-	-	-
2022/05 - Estates Strategy & Capital Projects	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	2	2	-	-	-	-
Total		2	2	-	-	-	-
2022/08 – Follow-Up Reviews 2021/22	1	-	-	-	-	-	-
	2	1	1	-	-	-	-
	3	8	7	1	-	-	-
Total		9	8	1	-	-	-
2022/10 - Asset and Fleet Management	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	5	5	-	-	-	-
Total		5	5	-	-	-	-
2022/11 - 2021/22 Student Activity Data	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	2	2	-	-	-	-
Total		2	2	-	-	-	-
Grand Totals		19	18	1	-	-	-

The grades, as detailed below, denote the level of importance that should have been given to each recommendation within the internal audit reports:

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

Acknowledgements

We would like to thank all staff for the co-operation and assistance we received during the course of our reviews.

Appendix I - Updated Action Plan

Internal Audit Report 2022/03 – Publicity and Communications

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R1 The College Communications & Marketing Framework, covering both External and Internal communications functions, should be completed and published for staff ahead of the 2022/23 academic session.	3	The College will finalise the new Communications & Marketing Framework, covering both External and Internal communications functions, by September 2022.	Communications and Marketing Manager	30 September 2022	The Communications, Marketing and Stakeholder Engagement Framework 2022-27 was presented to the Board of Management and approved by it on 29 August 2022. An update was provided on 4 December in light of a restructure of the Marketing Team. Fully Implemented

Appendix II - Updated Action Plan

Internal Audit Report 2022/05 - Estates Strategy & Capital Projects

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R1 The College's Financial Regulations and Procurement Procedures should be updated to reflect current management, approval levels, and the recent change in legislation in relation to considering VAT in whole life contractual costs. The arrangements for the approval of SSJ over the £25,000 threshold (or identified as higher risk) should be made clearer in the Procurement Procedures. Currently procedures (section 1.7.1.2) state that the Procurement Manager will advise on single tender procedures, however, the procedure is not explicit on the additional authorisation required. Good practice would ensure the Director or Head of Finance signs off higher risk exceptions where a procurement exercise is not conducted. Also the Procurement Procedures should be explicit on the reporting arrangements to the Finance and Resources Committee (or to the Board), including reporting on SSJs, to mirror the arrangements already described in the College's Financial Regulations.	3	The College's Financial Regulations and Procurement Procedures will be updated as recommended.	Vice Principal Operations Procurement Manager	30 September 2022	The Financial Regulations and Procurement Procedures have been updated. Completed in September 2022. <i>Fully Implemented</i>

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R2 Estates management should ensure that they fully adopt the College's Financial Regulations and Procurement Procedures in order to ensure that the College can evidence decision making around contractors' selection and confirm that variables such as quality, due diligence assessments, and sustainability considerations are also assessed, in addition to cost. SSJ Forms should be used as an exception with goods, works or services over £2,000 approved by the Procurement Manager, irrespective of timing of activity.	3	The main reason for not fully adhering with good practice was the lack of APUC support at a College and Regional level due to illness and bereavement. Should such circumstances occur again, then support will be sought from APUC nationally. Estates staff are aware of the Procurement Procedures, but they, and wider College staff, will be given refresher training.	Director of Corporate Services Head of Facilities (and Environmental Sustainability and Procurement Manager)	Training - 31 October 2022	Procurement training was carried out on 9 May 2023. <i>Fully Implemented</i>

Appendix III - Updated Action Plan

Internal Audit Report 2022/08 – Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
Internal Audit Report 2020/02 – Student Recruitment and Retention							
R2 Review the individual course guide pages on the College website and identify further opportunities to provide case studies video content, where this can be supported.	3	Agreed.	Yes	Director of Business Development	30 June 2020	August 2021: Based on this audit and other feedback, the College has agreed to fully redevelop the current College website. The specification includes reference to greater facility for video content. This redevelopment process is currently at the tender stage. August 2022: The website provider has now been contracted with a new website due to be completed by December 2022. This will deliver new course guide pages with video content. Revised completion date: 31 December 2022 Partially Implemented	A new College website was launched in January 2023 with a complete review of course content, video content and branding. Fully Implemented

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R3 Links to approved departmental social media sites should be added to the individual course guide pages of the College website as a way of channelling potential applicants to information which will provide further insight into programme activities and content and highlight the specific achievements of students.	3	Agreed.	Yes	Director of Business Development	30 June 2020	August 2021: This will be integrated into the redevelopment of the College website. August 2022: The individual course guide pages will be redeveloped as part of the work undertaken during the construction of the new College website. Revised completion date: 31 December 2022 Partially Implemented	All course pages have now been completely rewritten. Fully Implemented



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
Internal Audit Report 2020/07 – Business Development							
R3 The current format of the financial reporting of Non-SFC income should be revisited to allow the progress of the Business Development Team against financial income targets to be monitored more effectively throughout the financial year.	3	Work has already commenced to address this recommendation and will be further progressed over the next few months to provide enhanced reporting in this area.	Yes	Director of Business Development / Head of Finance	31 July 2021	August 2021: The scope of non SFC income that falls within the remit of the Business Development Team will be reported as follows. Progress against financial income targets, and costs where appropriate, will be reported to the College Finance and Resources Committee once a year. Reporting will generally take place annually at the September Meeting, but as this is the first year, an interim report will be presented in March 2022. August 2022: The Management Accounts to 31 July 2022, which will be presented to the Finance & Resources Committee in September, will include a detailed analysis of non SFC income and this will become part of the annual reporting process.	A Stakeholder Engagement paper was presented to Board of Management on 29 August 2022. Section 3 of the 2021/22 Management Accounts presented a detailed analysis of non-SFC income. Fully Implemented



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R3 (continued)						August 2022 (continued): Separately a report and supporting presentation on stakeholder engagement activities will be given to the College Board on 29 August 2022. Revised completion date: 20 September 2022 Partially Implemented	



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
Internal Audit Report 2021/02 – Sickness Absence							
R1 The College should review its approach to the completion of RTWs to attempt to improve levels of compliance across the College, including where possible a digital approach to minimise the required paperwork to complete the RTW process. In addition, a digital process would enable a more effective escalation procedure with automatic reminder emails issued to relevant line managers where the required RTW process is not being followed.	3	The College has been developing an online self-certificate service in partnership with its HR software provider. This will eliminate the need for paperwork and the system will send reminders to managers automatically. The HR Team will carry out a weekly audit of the system to ensure the self-certificate process is complied with by managers. The system will be rolled out to all departments by the end of session 20/21.	Yes	Director of Human Resources	31 July 2021	August 2022: The software provider, Cintra, was subject to a merger in 2021. This resulted in staff turnover and difficulties for the College in progressing this element of the system. The College has since been in discussion with Cintra over a few areas one of which is its transition from a server-based product to a cloud-based product. The arrangements for the transition have now been finalised and work is underway. The recently revised and agreed contract with Cintra for a cloud-based product will be effective from 1 September 2022. The cloud-based product provides access to the newly launched self-certificate service (including for absence management). The College will test the online self-service product during the month of September to ensure it meets its needs.	Following on from several delays because of the merger of the software company Cintra and another organisation, and a turnover of Cintra staff, along with a range of development issues with the system, the online self-certificate function was delayed. This function is now active. The system was tested with various departments during the month of July 2023. Staff were informed about the new self-certificate system on 10 August 2023 at an all-staff event. Training with managers and staff has taken place during July. Training will take place when staff are required to use the system, a member of the HR Team will take the manager and the staff member through the online process.



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R1 (continued)						August 2022 (continued): This will be followed by an introduction to the online self-certificate system for managers during the month of October 2022. Revised completion date: 31 October 2022 Partially Implemented	In addition, a guide on how to use the function was issued week beginning 14 August 2023. Fully Implemented

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R2 A target date should be set and monitored for the completion of RTW and formal interviews and the submission of the paperwork to HR. The level of compliance in meeting this agreed target date should be monitored and reported on. Implementation of recommendation R1 would also assist in this process, as reminders could be issued when the target date for completion has been missed, and non-compliance with the agreed reporting requirements would be automatically notified to the relevant line manager.	3	The online self-certificate system will send reminders to managers automatically within set timescales. The HR Team will carry out a weekly audit of the system to ensure the self-certificate process is complied with by managers. The online system will automatically notify managers when a formal interview is required.	Yes	Director of Human Resources	31 July 2021	August 2022: The online system will be available from 1 September 2022 and managers will be introduced to the service by the end of October 2022. The College will assess the new online self-certificate system once it has access to it to confirm if it contains an automatic notification for formal interviews. If it does not contain this element, the College will develop this with Cintra. The HR Team continues to work with managers to ensure that the formal interviews take place within an acceptable timescale from the trigger point being hit. This is monitored by the HR Manager. Revised completion date: 31 October 2022 Partially Implemented	The online self-certificate system issues a notification to managers when an absence occurs. When the employee enters their return-to-work date the manager is notified that a meeting is due. This is followed up with a reminder after 7 days and a second after a further 7 days. If the manager does not complete the return-to-work process within 14 days, the HR system notifies HR. HR will contact the next line manager to ensure the matter is progressed. For those staff absent on long-term absence the system is suspended by HR until the employee returns to work. This activates the process outlined above.



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R2 (continued)		The HR Team will carry out a weekly audit of the system to ensure the formal interview process is complied with by managers.					The HR Team continues to work with managers to ensure that the formal interviews take place within an acceptable timescale. This is monitored by the HR Manager. <i>Fully Implemented</i>

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
Internal Audit Report 2021/04 – Cash & Bank and Treasury Management							
R1 The Financial Procedures (2020) should be updated for all bank accounts such as the Clydesdale Bank account, authorising signatures, and staff who have access to the online bank accounts. The College's Financial Regulations (2018) and Procedures (2020) should also be updated for the College's 'restricted cash handling' policy which was implemented in March 2020.	3	Recommendation agreed. The Financial Procedures (2020) will be updated for all bank accounts such as the Clydesdale Bank account, authorising signatures, and staff who have access to the online bank accounts.	Yes	Finance Manager	31 December 2021	August 2022: The Financial Procedures were updated in June 2021 to include full information on authorised signatories and who has access to the online banking systems for all banks where the College has accounts. The Financial Procedures were also updated to note the restrictions on cash handling due to COVID-19. The Financial Regulations have not yet been updated to reflect the restricted cash handling policy. Revised completion date: 30 September 2022 Partially Implemented	The Financial Regulations were updated in September 2022. Fully Implemented



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
Internal Audit Report 2021/05 – IT Network Arrangements							
R2 Mechanisms, such as the use of ethical phishing campaigns, should be established to test the effectiveness of the range of security training provided to staff. The areas of the organisation that regularly feature in security incident reports or achieve the lowest feedback from information security questionnaires or training modules, should be the focus for further support and tailored training.	3	The College accepts this recommendation and will seek to implement methods to evaluate the effectiveness of the User Education & Awareness program.	Yes	Director of Digital Services	31 March 2022	August 2022: Cyber Security training is now a mandatory feature of staff training and is provided, and monitored, through the WorkRite system. A recent table-top exercise has been undertaken by the ICT team, which focused on the College's response to a phishing attack. Two staff from ICT services are currently undertaking a course relating to cyber-penetration testing, view a view to utilising the skills to implement a programme of simulated cyber-attacks. Revised completion date: 31 January 2023 Partially Implemented	A simulated phishing exercise has now taken place with staff, which was approved by SMT and in consultation with Trade Unions. Fully Implemented

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R3 Tools such as network IDS / IPS or SIEM should be placed on the network and configured to monitor traffic for unusual or malicious incoming and outgoing activity that could be indicative of an attack or an attempted attack. Alerts generated by the system should be promptly managed by the Digital Services team.	3	The College acknowledges this recommendation. The College will explore the feasibility of the implementation of SIEM and IDS solutions.	Yes	Director of Digital Services	30 April 2022	August 2022: The ICT team has implemented a Zero Trust methodology to provide the network with intrusion detection (IDS) and intrusion prevention (IPS). This will mitigate unwanted lateral movement between systems and detection malicious code. Implementation of a full SIEM solution is still being explored to assess the feasibility in relation to cost and benefit. Revised completion date: 31 January 2023 Partially Implemented	Three SIEM solutions have been investigated, all including a managed service to provide expert threat analysis. Cost managed SIEM solutions have proven prohibitive and not financially sustainable, with the exception of the JISC service. The JISC service is due to commence August 2023, and the College is actively engaged in determining technical specifications and final costs. The Director of Digital Services has now received quotes and these are being reviewed. A decision will be made imminently and this action concluded. Partially Implemented Revised completion date: 30 September 2023



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
Internal Audit Report 2021/08 – 2020/21 Student Activity Data							
R1 The records for the Digital Support distance learning programme or similar programmes should be improved to ensure that there is a full and centrally accessible record of student engagement and progress with the programme against set time-related milestones. The records should be monitored on a regular basis to identify and exclude from the Credits claim, as appropriate, students who are not continuing with the programme. Copies of records should be retained and made available for audit.	2	The College will clearly specify within its course approval documentation the engagement and progress monitoring requirements for distance learning provision. The MIS Manager will meet with Senior Teaching staff to ensure that they are aware of the administrative requirements of on- line provision.	Yes	MIS Manager	Process in place by end of Block One (Dec 2021) and finalised by audit Sept 2022.	August 2022: Documentation relating to course approval has been updated to include information relating to deliver mode (flowchart provided). The Head of SIS met with all teaching staff involved with delivering the Distance Learning curriculum and advised of the procedures and processes that were required to enable credits to be claimed for this type of programme. At the end of the first and second blocks (Dec 2021 and Mar 2022), the Head of SIS conducted an audit on distance learning classes and fed back the findings and recommendations to both the Heads of Department and the associated members of teaching staff. The block 3 audit is ongoing.	2021/22 Block 3 audit report completed. 2022/23 Audits have continued through Academic Session 2022/23. Block 3 audit has not been completed yet – ASOS may prevent any action. These audits will continue to be carried out through Academic Session 2023/24. All distance learning classes are now on Moodle. This work was undertaken throughout the 2022/23 Academic Session. This will be tested as part of the 2022/23 Credits audit. Fully Implemented



Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2023
R1 (continued)		Additionally, at the end of each block an audit, to mirror that conducted by the internal auditors, will be carried out on each group, to ensure that procedures and requirements are being met.				August 2022 (continued): Work is starting in Academic Session 2022/23 with the Faculty Directors to move all activity for distance learning courses to a Moodle platform. This will assist with reporting throughout the year and with year-end final reports. Revised completion date: 30 November 2022 Partially Implemented	



Appendix IV - Updated Action Plan

Internal Audit Report 2022/10 – Asset and Fleet Management

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R1 The Fixed Asset Procedures should be updated to define the assets that should be tracked on the asset register and those that should not. Consideration should be made to inclusion of detail on the two asset categories identified in the observation. Further guidance should also be provided on valuing donations and on the treatment of depreciation of non-purchased items.	3	Recommendation accepted. Fixed Asset procedures should be updated to clarify what should be recorded and tracked on the Asset Register. Further guidance on donated assets will also be provided.	Head of Finance Director of Corporate Services	31 March 2023	The Fixed Asset Procedure has been fully updated and flow charts have been produced. Guidance on donated assets has also been produced. The Procedure was presented to SMT and approved on 21 March 2023. A training course was delivered on 8 March 2023 by the Director of Estates and Corporate Services, Head of Finance and the Corporate Support and Administration Manager. The document has been uploaded onto the College Intranet and an article has appeared in SWAY in relation to this procedure. Fully Implemented

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R2 Campus receptionists, purchasing staff and budget holders should be reminded of the new processes to contact Estates on receiving assets (purchased or donated) with a value over £250.	3	Recommendation accepted. Workshops will be arranged to re-enforce the requirements of the Fixed Asset procedures.	Director of Corporate Services Head of Finance	31 March 2023	Fixed Asset Procedure training provided during Staff Development Day. This was recorded so that staff can review again. Fully Implemented
R3 Budget holders should be reminded of their roles and responsibilities as custodians of College equipment and assets and ensure that local inventories are developed for monitoring the location of items of value. These inventories should be provided to Estates, at least annually, as part of their compliance checks on items and for reporting on disposals to the Finance and Resources Committee.	3	Recommendation accepted. Workshops will be arranged with Budget Holders and relevant staff to re-enforce the procedures.	Director of Corporate Services Head of Finance Head of Facilities and Environmental Sustainability	31 March 2023	Workshop held with staff, which was recorded. Training re-enforced procedures in relation to College assets, from arrival through to disposal. Fully Implemented

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R4 An electronic process for recording the status of vehicle roadworthiness should be created in order to highlight any red flags or trends. For example, to track the results of safety inspections to determine any trends or cost savings. As a minibus operator, the College must make sure that the system used for recording daily and 10 weekly safety checks, as well as maintenance schedules, meets the requirements of their permit. Minibuses should have additional safety inspections completed at least every 10 weeks in line with UK Government and DVSA requirements for Schedule 19 permit compliance.	3	There was a digital system in place, but this was not being used. A new electronic system has been established involving various staff members to ensure there is no single point of failure. This will be closely monitored with records kept in line with guidance provided by auditors. A comprehensive vehicle process is currently being written and refresher training will be provided to vehicle users.	Director of Corporate Services Head of Finance Head of Facilities and Environmental Sustainability	31 March 2023	An electronic deadline process is in place which tracks all vehicle roadworthiness requirements. This is monitored by various Estates and management staff so there is no single point of failure. Records are retained for inspection as required. Fully Implemented
R5 Mileage should be tracked as part of the daily safety check on minibuses. Good practice would dictate that as well as minibuses the other three vehicles are also checked.	3	Recommendation accepted. A refresher is required for everyone who uses the College vehicles. A comprehensive step by step vehicle process has been drafted which will have a flowchart attached too for ease with relevant links.	Director of Corporate Services Head of Finance Head of Facilities and Environmental Sustainability	31 March 2023	A comprehensive Vehicle Procedure has been drafted including flow charts for ease of checking. This was presented to SMT on 21 March 2023. Mileage logs completed as appropriate - all users of vehicles. Fully Implemented

Appendix V - Updated Action Plan

Internal Audit Report 2022/11 – 2021/22 Student Activity Data

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R1 The College should ensure that programmes and students are correctly classified as full-time or other in line with the Credits guidance.	3	Where appropriate the MoA of the class will be amended to reflect the Credits being allocated for the planned learning of the student, instead of amending the MoA of the student at student enrolment level.	Head of Student Information Services	Throughout academic session 2022/23	Block Release classes with credits due to be >15 were given the MOA 17 at class level, instead of 06. All students enrolled in these programmes would attract the same credits as they are following one programme. Part time classes were left at 08 at class level and any student with credits >15 were amended at enrolment level. Enrolments to part time classes can attract various credit amounts. The SFC Error reports are used to ensure that none of these are missed. This will be tested as part of the 2022/23 Credits audit. Fully Implemented

Follow Up Reviews 2022/23

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2023
R2 Review the checks carried out at course set-up to ensure that Credits claimed agree to SQA (or other awarding body) credit rating or planned learning hours/40	3	Head of SIS will ensure that Student Records closely monitor the setup of non-modular activity based on the SQA principle of planned learning hours for a unit. Additionally, Student Records staff will be reminded to ensure that unit Credits and FES2 Planned Credits need to match to ensure the accuracy of the Credit claim	Head of Student Information Services	Throughout academic session 2022/23	The Non-Modular policy explains the principle that is followed by the Student Records team. Staff are reminded when finalising classes at the end that they check the unit credits and the FES2 credits match where appropriate. Reports have been introduced to check the units' credits against the FES2 credits. This will be tested as part of the 2022/23 Credits audit. Fully Implemented

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