

Item 15b
For Approval and Endorsement

Glasgow Kelvin College

Board of Management Meeting of 10 December 2025

Policies, Procedures and Frameworks

Report by Director of Estates and Corporate Services

1. Introduction

As members will be aware, and in line with the review schedule, the following policies are due for review and approval:

- Anti-Fraud and Anti-Corruption Policy
- Gifts and Hospitality Policy
- Public Interest Disclosure (Whistleblowing) Statement of College Policy

The following Framework is also due for review:

- Information and Security Framework

Copies attached at **Appendices 1-4.**

2. Changes to Policies

2.1 Anti-Fraud and Anti-Corruption Policy

The College’s Anti-Fraud and Anti-Corruption Policy has been extensively updated as per the Henderson Loggie audit recommendations below:

Audit Report	Audit Reference	Original Recommendation	Priority	Management Response	Agreed	To Be Actioned	No Later Than	Progress	High Priority	Medium Priority	Low Priority	Considered Complete by Owner
Fraud Prevention, Detection and Response		the College should take steps to update its Anti-Fraud & Anti Corruption Policy and Anti Bribery Policy Statement to ensure alignment with the Money Laundering Policies and Procedures to ensure that staff are equipped with knowledge required to meet the duties placed upon the College as set out in the 2011, Money Laundering Act, Terrorist Financing and Transfer of Funds Regulation 2017 (and the 2022 update).	3	Henderson Loggie could provide example wording, this would be appreciated.	Yes	L Clark	30 November 2025	Update as at November 2025 The College received some advice from Henderson Loggie in regard to the items that should be contained within such Policies. Extensive work has taken place to fully update these policies and the head of Finance has also been involved in reviewing these documents and related procedures. These policies are on the Audit and Risk Committee agenda for 25 November 2025.			1	Yes
Fraud Prevention, Detection and Response	2025/03	R2 – The College should develop and implement a documented approach for all future potential fraud investigations to ensure that they are undertaken in a consistent way which ensures, fairness, independence, and provides sufficient documentation and evidence for further investigation by any external body (such as a professional body).	3	This recommendation is accepted. If Henderson Loggie could provide any example approaches, this would be appreciated.	Yes	J Evans	30 November 2025	Update as at November 2025 As above, the College reviewed advice received from Henderson Loggie in regard to the documented approaches required. Attached to the Anti-Fraud and Anti-Corruption Policy are the procedures that are laid out in a consistent manner and covers requirements in this audit recommendation. These procedures are contained within the Policies paper on the Audit and Risk Committee agenda for 25 November 2025.			1	Yes

The Director of Estates and Corporate Services and the Head of Finance have gone over this Policy and related procedures in detail and are content that it meets audit requirements.

This fully updated and amended Policy complete with documented processes as requested by Henderson Loggie is available as per **Appendix 1** to this paper on the portal. All changes made are detailed in blue text.

The Audit and Risk Committee have endorsed this Policy.

2.2 Gifts and Hospitality Policy

The Gifts and Hospitality Policy has been read through in detail by the Director of Estates and Corporate Services and the Secretary to the Board of Management and minor updates have been made.

All changes made are detailed in [blue](#) text.

The updated Gifts and Hospitality Policy is available as per **Appendix 2** to this paper on the portal.

The Audit and Risk Committee have endorsed this Policy.

2.3 Public Interest Disclosure (Whistleblowing) Statement of College Policy

The Public Interest Disclosure (Whistleblowing) Statement of College Policy has been read through in detail by the Director of Estates and Corporate Services and the Secretary to the Board of Management and minor updates have been made.

All changes made are detailed in [blue](#) text.

The updated Public Interest Disclosure (Whistleblowing) Statement of College Policy is available as per **Appendix 3** to this paper on the portal.

The Audit and Risk Committee have endorsed this Policy.

2.4 Information and Security Framework

The Information and Security Framework has been reviewed in detail by the Director of Estates and Corporate Services, the Director of Digital and Information Services, the Regulations and Compliance Manager and the DPO at HEFESTIS.

The framework establishes a structured approach to managing information securely across the College, aiming to protect confidentiality, integrity, and availability of data while ensuring compliance with UK GDPR, Data Protection Act 2018, and other relevant legislation.

This Framework has also been reviewed by members of the Senior Leadership Team.

There are very minimal changes to the Information and Security Framework. These are denoted in [blue](#) text. The Information and Security Framework is available as per **Appendix 4** to this paper on the portal.

2.5 Further Information

All policies have been reviewed and approved by the Senior Leadership Team and it was agreed that the College would develop appropriate materials to update staff and stakeholders on these important policies. This is particularly prevalent in regard to the Anti Fraud and Anti Corruption Policy where organisations have a duty to prevent fraud and can be subject to criminal investigation and prosecution for failing to prevent an

underlying criminal offence such as bribery (Bribery Act 2010), tax evasion facilitation (Criminal Finances Act 2017) and, from 1 September 2025, fraud (Economic Crime and Corporate Transparency Act 2023).

Organisations must implement reasonable prevention procedures to address risk of financial crime offences; this is currently being discussed with the Vice Principal Operations and the Head of Finance.

We note that consequences of a breach are severe, both for organisations and senior management including imprisonment, fines and damage to reputation

The Audit and Risk Committee also reviewed these policies at their meeting of 25 November 2024. No changes were requested.

The Information Security Framework was reviewed by the Senior Leadership Team at their meeting on 2 December 2025.

3. Resource Implications

There are no real resource implications involved in terms of reviewing these governing documents.

4. Impact on Students

There are no negative impact on students identified as a consequence of anything within this report or the routine review of these policies.

5. Equalities

No adverse impacts on individuals with protected characteristics have been identified as a consequence of this report. Equality Impact Assessments for these policies have been refreshed and are available upon request.

6. Risk and Assurance

Risk to the College is mitigated by ensuring that appropriate governing documents are in place and that the Board of Management receive the necessary assurances that these are being reviewed within the governing framework.

Members of the Senior Leadership Team note their duty to prevent fraud as detailed in paragraph 2.5; this is being discussed and planned.

7. Data Protection

There are no data protection implications arising as a consequence of this report.

8. Environmental and Sustainability

There are no new environmental and sustainability matters arising from the contents of this report.

9. Recommendations

It is recommended that members:

- i) note the contents of this report; and
- ii) approve the Anti-Fraud and Anti-Corruption Policy as contained in **Appendix 1**;
- iii) approve the Gifts and Hospitality Policy as contained in **Appendix 2**;
- iv) approve the Public Interest Disclosure (Whistleblowing) Statement of College Policy as contained in **Appendix 3**;
- v) approve the Information Security Framework as contained in **Appendix 4**.

10. Further Information

Further information can be obtained from Lisa Clark, Director of Estates and Corporate Services on lisaclark@glasgowkelvin.ac.uk, Heather Jackson, Secretary to the Board of Management at hjackson@glasgowkelvin.ac.uk or Alan Carr, Head of Finance at acarr@glasgowkelvin.ac.uk

Lisa Clark
Director of Estates and Corporate Services
December 2025