

Meeting	Board of Management
Date and time	Tuesday 19 December 2023 at 4.30 p.m.
Location	Microsoft Teams

Governance Officer
 12 December 2023

AGENDA

The timings on this agenda are indicative only and may extend beyond times highlighted.

Welcome and Apologies

Declaration of Interests and/or any Statement of Connections or Transparency Statements.

16:30 – 17:00 **BOARD CREATIVE SPACE**

16.30-16.55 **PRINCIPAL’S OVERVIEW**

Closed Session

ITEMS FOR DECISION

- 16:55 – 17:00 **1) MINUTES**
- a.) Meeting of the Board of Management held on 03 October 2023
 - b.) Closed Session Note (CSN-01-102023) of the Board of Management held on 03 October 2023
 - c.) Confidential Note (CN-BoM-01-102023) of the Board of Management held on 03 October 2023

17:00 – 17:10 **2) OUTSTANDING ACTIONS**
 Actions List

17:10 – 17:20 **3) HEALTH & SAFETY ANNUAL REPORT**

Report by Health, Safety & Sustainability Manger

- 17:20 – 17:30 **4) LONGMAN SITE DISPOSAL**
Report by VP – Curriculum, Operations & External Relations
- 17:30 – 17:40 **5) SUB-STRATEGIES & POLICIES FOR APPROVAL**
Report by Interim Assistant Finance Director
a.) Anti-Fraud Policy
b.) Staff Travel and Transport Policy
c.) Financial Regulations Policy
d.) Risk Management Policy
e.) Value for Money Policy

ITEMS FOR DISCUSSION

- 17:40 – 17:50 **6) KPI MATRIX**
Report by Operations and Commercial Manager
- 17:50 – 18:20 **7) PRINCIPAL'S REPORT (CONFIDENTIAL)**
- 18:20 – 18:30 **8) WORKING IN PARTNERSHIP REPORT**
Report by Quality & HISA
- 18:30 – 18:40 **9) GOVERNANCE UPDATE**
Report from Governance Officer
- 18:40 – 18:45 **10) DRAFT MINUTES OF MEETINGS OF BOARD COMMITTEES (CONFIDENTIAL)**
a.) Chairs Committee held on 02 November 2023
b.) HR Committee held on 16 November 2023
c.) LT&R Committee held on 05 December 2023 – to follow

FOR NOTING

- 18:45 – 18:50 **11) Q1 COMPLAINT HANDLING REPORT**
Report by Quality Manager
- 18:50 – 18:55 **12) EXTERNAL AUDITOR FAILURE**
Report by VP – Curriculum, Operations & External Relations

13) AOCB

14) DATE AND TIME OF NEXT MEETING

13 February 2024 at 4.30 p.m.

If any member wishes to add an item of business to the Agenda, please inform the Chair and the Governance Officer as soon as possible. Additional items of business

will only be considered for inclusion in the agenda in advance of the start of the meeting.

Board of Management

MINUTES of the BOARD OF MANAGEMENT HYBRID MEETING held via Rooms 203/204, Inverness Campus and Microsoft Teams on 3 October 2023

PRESENT: Mark Sheridan, Chris O’Neil, Donald MacKenzie, Dee Bird, Rojan Kumar Subramani, Arvinder Kainth, Matthew Millward, Michael Beveridge, Gillian Galloway, Sally Blyth, Amy Goodbrand, Russell Edwards, Stephen Sheridan, Pauline Tuthill, Innis Montgomery, Elizabeth Keegan, Holly Pearce, Wendy Grindle, Janette Campbell

CHAIR: Mark Sheridan

APOLOGIES: James Millar, Tina Stones

IN ATTENDANCE: Vice Principal – Student Experience and Quality
Vice Principal – Operations and External Relations
Chair of Court
Director of Finance
Operations and Commercial Manager
Director Centre for Living Sustainability
TEL – Management, Health & Creative Arts
Professional Development Manager
Governance Officer

The Chair welcomed everyone to the meeting and introductions were made.

The Chair welcomed the new to the post Governance Officer.

The Chair welcomed the Director Centre for Living Sustainability as a lead research presence.

The Chair welcomed the Chair of Court.

Closed Session – Board Creative Space

A closed session took place, which provided the Board with an opportunity to discuss the email from EO on 2021/22 SFC FE & HE Funding Clawback and provided an update on outcomes from UHI Chairs and Principals Stirling meeting (Note of Session: CSN-01-102023).

Innis Montgomery joined the meeting.

The Chair of Court left the meeting.

Declarations of Interests

No declarations of interest, statements of connections or transparency statements were noted.

1. MINUTES

a.) Meeting of the Board of Management held on 27 June 2023

Decision: The minutes of the Board of Management Meeting held on 27 June 2023 were **AGREED** as a correct record and were **APPROVED**.

b.) Closed Session Note (CSN-01-062023) held on 27 June 2023

Decision: The Closed Session Note (CSN-01-062023) of the Board of Management Meeting held on 27 June 2023 was **AGREED** as a correct record and was **APPROVED**.

c.) Closed Session Note (CSN-02-062023) held on 27 June 2023

Decision: The Closed Session Note (CSN-02-062023) of the Board of Management Meeting held on 27 June 2023 was **AGREED** as a correct record and was **APPROVED**.

d.) Confidential Note of Discussion (CN-BoM-01-062023) held on 27 June 2023

Decision: The Confidential Note of Discussion (CN-BoM-01-062023) of the Board of Management Meeting held on 27 June 2023 was **AGREED** as a correct record and was **APPROVED**.

2. OUTSTANDING ACTIONS

- **Partnership Agreement** – It was reiterated to the Board that updates to the Partnership Agreement have ceased whilst the work streams from UHI 2024 are conducted. The Principal provided the Board with a confidential update in respect of UHI 2024 advising that work is continuing to progress.
Action: The Governance Officer will circulate to the Board a note of the UHI 2024 Curriculum Update which was provided to staff as part of a Wee Connect update in May 2023.
- **Business Solutions Team Presentation** – The Governance Officer advised the Board that Creative Space Sessions are being diarised for the upcoming Academic Year as part of the Board Development Plan. The Board was advised that the Business Solutions Team Presentation would be scheduled for the Board in conjunction with updates on the revitalisation programme and curriculum review.
- **Finance Training** – The Governance Officer advised that finance training for all Board Members had been arranged by the Professional Development Team and was carried out in June 2023. The Board provided feedback on the training.
Action: The Board requested a follow up Finance Training session, which the Governance Officer will arrange following the return of Academic Staff in August 2023.

- **Partnership Working** – The Principal advised the Board that we are continuing to look at partnership working. The Board noted that a collective decision had been made to cease the move to ITrent and that we are currently going through the procurement process again, in conjunction with others in the partnership, in respect of a combined Payroll and HR System.
- **UHI Inverness College Annual Audit Report by Ernst and Young** – The Governance Officer advised the Board that the Audit Committee continue to review all outstanding recommendations. In respect of the Internal Audit Recommendations the Board was advised that 15 remain active but that most are interrelated. The Board noted that it is expected that the financial recommendations will be closed once the procurement strategy and financial regulations have been updated.
- **UHI 2024** - The Governance Officer will circulate to the Board a note of the UHI 24 Curriculum Update, which was provided to staff as part of the Wee Connect update in May 2023.
- **Finance Training Sem 2**– The Governance Officer will arrange a further follow up session for Board Members. Speaking to Sarah Sutherland about another session to be offered in Sem 2.

3. RISK REGISTER UPDATES

The Director of Finance spoke to his report on Risk Register Updates. The Board was advised that all updates had been subject to Audit Committee review in September and had been recommended for final approval by the Board.

The Board enquired as to a number of Gross and Residual risks that have been labelled in red. The Board expressed their concerns about the register, and agreed more transparency is needed from EO site.

Decision: The Board **APPROVED** Risk Register Updates.

4. FINANCE UPDATES

Director of Finance spoke to his joint report on Revenue Budget 1 August 2023 – 31 July 2024, and Financial Forecast Return 2022/23 to 2025/26 which provided the Board with an overview of new and continuing activity.

The Board was advised that both reports were sent to SFC in June and were subject to F&GP scrutiny with recommendation for final approval by the Board.

The Board discussed forecasted Research income increase and other income generation and a further discussion around the sale of the Longman Site took place.

Decision: The Board **APPROVED** joint report on Revenue Budget 1 August 2023 – 31 July 2024, and Financial Forecast Return 2022/23 to 2025/26.

Action: The Board requested a training session with Finance team to be organised for HISA Board members.

5. SUB-STRATEGIES & POLICIES FOR APPROVAL

a.) Procurement Strategy

The Board was advised that this strategy had been recommended for Board approval by the Finance and General Purposes Committee. The Board received confirmation that this strategy will be reviewed annually in compliance with the Procurement Reform (Scotland) Act 2014.

Decision: The Board **APPROVED** Procurement Strategy.

b.) FE Fee Waiver Policy

The Board was advised that this policy had been recommended by the Finance and General Purposes Committee for approval. The Board was also advised that this policy is required to set out a regional approach to Further Education Fee Waivers for Inverness College UHI and all academic partners in UHI.

Decision: The Board **APPROVED** the FE Fee Waiver Policy.

6. KPI MATRIX

Operations and Commercial Manager spoke to his report to provide the Board with an overview of the agreed KPI measures for 2023/24.

The Board was advised that monitoring frequency is dependent upon the timing of the measure itself, for instance UHI Inverness monitors student number measurements on a monthly basis at EMT level (weekly at an operational level), so student number measures for the KPI matrix are profiled on a monthly basis. Whereas NSS and SSES surveys are only undertaken annually, so these are profiled and reported annually.

The Board discussed all Performance Measures provided, welcomed all achieved targets and a further discussion around the targets still not achieved took place.

Decision: The Board **APPROVED** the KPI Matrix report.

7. PRINCIPAL'S REPORT

TEL – Management, Health & Creative Arts & Professional Development Manager joined the meeting.

The Principal spoke to his confidential report (CN-BoM-01-102023) which provided the Board with an overview of new and continuing activity.

Director of Finance left the meeting.

Donald MacKenzie left the meeting.

TEL – Management, Health & Creative Arts & Professional Development Manager left the meeting.

8. OUTCOMES AND SATISFACION RATES

The Information Systems Manger joined the meeting.

Vice Principal – Student Experience and Quality & the Information Systems Manager spoke to their report to provide the Board with an overview of Student Outcomes and Satisfaction for AY 22-23.

The Board was advised that Early & Further Withdrawals had declined for FE & HE in last AY. Due to ongoing ASOS dispute, FE Successful Outcomes had been predicted to reach 68.9% which will be an improvement of 10.9% on last year's out-turn. HE outcomes are harder to predict given the higher volume of outstanding outcomes across the UHI partnership.

The Board commented on extremely high Student Satisfaction and response rate welcomed the co-operation with local charities.

Decision: The Board **APPROVED** the Outcomes and Satisfaction Rates report.

Gillian Galloway left the meeting.

9. STUDENT ACTIVITY AND RECRUITMENT

The Information Systems Manager spoke to her report to provide the Board with the final student enrolments and withdrawals for 2022/23, and the status of current recruitment for 2023/24.

The Board was advised of a summary of the final student enrolments and withdrawals for 2022/23, and the status of current recruitment for 2023/24. A discussion about credit targets met and rebased, FE & HE withdrawals and current recruitment levels took place.

Decision: The Board **APPROVED** the Student Activity & Recruitment report.

The Information Systems Manger left the meeting.

10. GOVERNANCE UPDATES

The Governance Officer spoke to her report which provided the Board with an update on all governance matters and highlighted:

- Open nomination process for the position of the Audit Committee Chair
- Feedback from annual review exercise (Appendix 1)
- Feedback from Committee and Chair evaluation (Appendix 2)
- Note of interests to join HR Committee

11. DRAFT MINUTES OF MEETINGS OF BOARD COMMITTEES

The Board noted the contents of the confidential notes of meetings of the:

- HR Committee held on 22 June 2023
- Chairs Committee held on 31 August 2023
- Audit Committee held on 05 September 2023
- Finance and General Purposes Committee held on 07 September 2023
- HR Committee held on 14 September 2023

12. DATE AND TIME OF NEXT MEETING

Tuesday 19 December 2023 at 4.30 p.m.

Board of Management – List of Outstanding Actions

29 June 2021				
Partnership Agreement	<p>A progress update on the timeline will be taken and discussed at each Board meeting to ensure that the partnership is delivering on the agreed timescales.</p> <p>Part 1 has been agreed in principle. Part 2 requires additional work, and a further draft is now being considered.</p> <p>This has been halted whilst actions from the UHI Revitalisation Programme are carried out.</p>	Principal	On Hold	
05 October 2021				
Closed Session	<p>The Business Solutions Team are to attend a Board Meeting to present the pro-active ways in which they are working. This will be scheduled as part of the Board Development Plan for AY 23-24.</p>	Gov Off	Summer 23 Ongoing	Attending June '24 meeting
10 February 2022				
Finance Update	<p>The Governance Officer will source appropriate financial training for Board Members – this will be included within a development training plan for Board Members.</p>	Gov Off	Oct 23 Completed	

ITEM 2.0

	Finance Training was provided to members in June 2023. A follow up session will be arranged at the beginning of the new Academic Year. Audit training session provided by David Nicholl on 16 th November 2023.			
28 June 2022				
Confidential Annex – Partnership Working	The Principal will engage with potential partners and carry out due diligence in respect of proposals. We are currently going through a further procurement process in respect of a shared Finance, Payroll and HR system.	Principal	Ongoing Suzanne Stewart, Information Development Manager, has recently made recommendations to data sharing model.	
07 February 2023				
UHI Inverness College Annual Audit Report by Ernst and Young	The Audit Committee will be presented with an update and be requested to approve the removal of several actions. The Audit Committee will also be provided with an update on the actions that remain outstanding. An update on the list will be provided to the Board at each meeting.	Gov Off & Principal	Action to be superseded. We are in the first year of contract with Deloitte. New action proposed to monitor and evaluate the failure by our new external auditors to complete audit reports on time.	
27 June 2023				
UHI 2024	The Governance Officer will circulate to the Board a note of the UHI 24 Curriculum Update, which was provided to staff as part of the Wee Connect update in May 2023.	Gov Officer & Principal	Ongoing	Workshop will take place on January 19 th

ITEM 2.0

Finance Training Sem 2	Finance Training – The Governance Officer will arrange a further follow up session for Board Members. Speaking to Sarah Sutherland about another session offered in Sem 2.	Gov Officer	Ongoing	
03 October 2023				
Finance Training HISA	Training session with Finance Team to be organised for HISA Board members. Session to take place in January 2024.	Gov Officer & Finance	Ongoing	
Principal's Report: Enquiring Minds Scheme	Enquiring Minds Scheme presentation to be circulated to the Board.	Governance Officer	Completed November 2023	
Principal's Report: Enquiring Minds Scheme Update	An update on Enquiring Minds project to be presented to the Board during one of the Board Creative Space sessions.	TEL & Prof Dev Manager	Spring 2024 Ongoing Looking at March or even June meeting	

•

Subject/Title:	Health & Safety Annual Report 2022-23
Author:	Mark McKerral, Health, Safety & Sustainability Manager
Meeting:	Board of Management
Meeting Date:	19 December 2023
Date Paper prepared:	11 December 2023
Brief Summary of the paper:	<p>There have been 2 RIDDOR incidents in the 12-month period from 1st December 2022 to 30th November 2023.</p> <p>Data pertaining to incident/near miss reporting and staff participation in mandatory H&S training modules is provided.</p>
Action requested:	Discussion
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	
Resource implications:	No If yes, please specify:
Risk implications:	No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	Health and Safety Committee, comprising a cross section of the college including management, staff and trade union reps.

Status – [Confidential/Non confidential]	Non-Confidential		
Freedom of Information Can this paper be included in “open” business* [Yes/No]	Yes		
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs	
Its disclosure would substantially prejudice the commercial interests of any person or organisation		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Executive Summary

This report covers the period 1st December 2022 to 30th November 2023. There were two RIDDOR reportable incidents during the reporting period. The total number of reported incidents is now similar to our pre-covid number.

We continue to use the iHasco platform for health and safety training. We have introduced the Sypol platform to manage hazardous substances.

Some inconsistencies in our asset management procedures have been identified, and a plan to address them has been implemented.

The Scottish Fire and Rescue Service have changed how they respond to automatic fire alarms, which has meant we have had to update our procedures and provide additional training for some staff.

Health & Safety Management

The new Health, Safety and Sustainability Manager, Mark McKerral, took up post in April. Martin Kerr, Estates and Campuses Services Manager, had been covering the duties since September 2022.

Mark was originally reporting to Georgie Parker, Vice Principal Operations & External Relations. However, this reporting changed in October. Mark now reports directly to Chris O'Neil, Principal and Chief Executive.

Incidents

There were two RIDDOR reportable incidents during the reporting period. One related to a fall sustained by an employee, which led to a more than seven day absence.

The other related to an apprentice who was injured in a workshop activity and had to attend hospital for stitches. This incident would not have been previously reported under RIDDOR due to the apprentice's employment status. However, we have received new guidance suggesting apprentices are considered the same as any other student or member of the public for RIDDOR reporting. This change in reporting approach may lead to a slight increase in the number of RIDDOR reports submitted.

A break down of all incidents reported during the reporting period is shown in table 1.

Table 1:

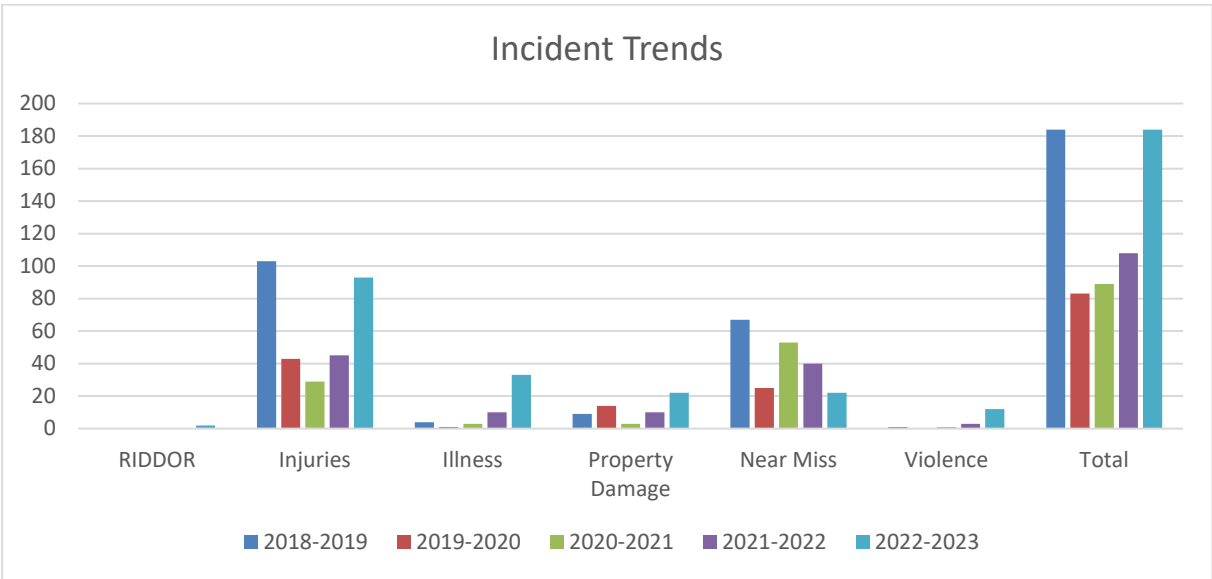
Incident Type	2022-2023
RIDDOR	2
Injuries	93
Illness	33
Property Damage	22
Near Miss	22
Violence	12
Total	184

As previously reported, the annual total number of reported incidents continues to increase as we return to pre-covid activity. The total number of incidents recorded in the past 12-month period (184) is identical to the same 12-month period in 2018/2019, prior to the pandemic.

It is thought that there may be some underreporting of incidents. For example, we have recently seen an influx in reporting of minor cuts from Hair Dressing students working with scissors on training blocks. These incidents have always occurred but had not previously been reported. There has also been a decline in near-miss reporting. This may be because most near-misses type incidents (such as damaged electrical outlets) are reported directly to the Estates team. We will continue to work with staff to highlight the need for all accidents and near misses.

Chart 1 shows incident data, broken down into incident types, for the past 5 years. Data relating to incidents occurring in the nursery prior to its being leased to CALA have been removed to allow for like-for-like comparison. There may be some differences in how certain incident types were reported in the software used pre-2022.

Chart 1



Health & Safety Training

We continue to use the iHasco online training suite to deliver our mandatory Health and Safety Training for all staff. We have identified the courses in Display Screen Equipment (DSE), Fire Awareness and Slips, Trips and Falls as being required for all staff. We will add Electrical Safety and Accident Reporting to the list in 2024. All mandatory modules will be repeated every two years.

The data in table 2 below shows the completion rates for the mandatory online Health & Safety staff training modules.

Table 2:

Module	Completed
DSE Training	91%
DSE Assessment	78%
Fire Awareness	93%
Slips, Trips and Falls*	78%

*This course was released in October, staff have been given to 22nd December 2023 to complete it.

A selection of role-specific training, covering topics like COSHH, PUWER and working at height, has also been added to the system. Line managers can choose to have members of their team enrolled on these courses.

Control of Substances Hazardous to Health (COSHH) Management

We have procured a new system from EcoOnline, called Sypol, to manage our hazardous substance risk assessments. Unlike previous COSHH systems, Sypol provides a database to store our assessments and writes and maintains the assessments for us. This will allow for a greater level of consistency across the organisation. Several COSHH champions from across departments attended an initial training session with a Sypol consultant in November and will now help roll the system out.

Asset Management and PUWER

Some inconsistencies in our approach to asset management were highlighted in November. The Estates and Campus Services Manager and Health, Safety and Sustainability Manager, under the direction of the Principal and EMT have been working with curriculum managers and staff to address these inconsistencies.

We have been using the Provision and Use of Work Equipment Regulations (PUWER) to provide a framework to review the arrangements for things like servicing, maintenance, training and risk assessment of our higher-risk or critical pieces of equipment. This is a significant piece of work which is expected to continue into next year.

Fire Evacuation

In July, the Scottish Fire and Rescue Service implemented a new policy of not attending to automatic fire alarms unless it was a confirmed fire. This requires premises to either have more advanced fire alarm systems, or to have staff investigate activations and call 999. At present, none of our fire alarms are advanced

enough to allow the fire service to be called automatically. GTFM have been working on a fix for this, but progress has been slow.

As an interim measure, we have provided additional training and guidance to Estates Officers and Duty Managers around how to investigate the source of a fire alarm activation safely and to call 999 if necessary.

Board of Management Meeting

Subject/Title:	LONGMAN SITE DISPOSAL
Author: [Name and Job title]	Georgina Parker Vice Principal – Curriculum, Operations & External Relations
Meeting:	Board of Management
Meeting Date:	19 December 2023
Date Paper prepared:	12 December 2023
Brief Summary of the paper:	This paper provides confirmation of the sale of the final part of legacy estate, the Longman site.
Action requested: [Approval, recommendation, discussion, noting]	To note the disposal. To approve the closure of the Estates Legacy Project Board.
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	Strategic Plan Risk Management
Resource implications:	If yes, please specify: Recouping of costs associated with Longman demolition and disposal.
Risk implications:	If yes, please specify: Completion of sale removes risks associated with ownership of the Longman site and associated equipment lease. Overage section included in Part 4 of the Offer to Purchase.
Equality and Diversity implications:	If yes, please specify: N/A
Consultation: [staff, students, UHI & Partners, External] and provide detail	Preferred bidder approved by the Estates Legacy Project Board. Sale supported by SFT and approved by Scottish Government.
Status – [Non confidential]	Non confidential
Freedom of Information Can this paper be included in “open” business* [Yes]	Yes

*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Update and Recommendation

I am happy to report that the sale of the remaining part of the former Longman College site was completed on 13th December 2023. This concludes the sale of all parts of the legacy estate.

As such I would **recommend** that the Board considers the closure of the Estates Legacy Project Group, which has completed its work.

The following documents pertaining to the sale are attached.

Appendix I: Ministerial Approval

Appendix II: Disposition Document

Appendix III: Offer to Purchase

I would draw your attention to Part 4 of the Offer to Purchase, which provides for overage should the site be re-sold at a higher price without having been redeveloped.

Recording of Thanks

The disposal process was supported by Scottish Futures Trust and our agents Montagu Evans/Rennie Properties. It was approved by Scottish Government with assistance from the SFC.

I would ask the Board to record and convey our sincere thanks to Anna Tozer and Paul Devine of Scottish Futures Trust, to John Hill and Sandy Rennie of Montagu Evans/Rennie Properties and to Rufus Logan of the SFC, for their support and advice both to me and previously to Lindsay Ferries, throughout the disposal process. I would also like to thank the many Board members who supported the Estates Legacy Project Board over the years.

Finance

The sale price was £1,240,000 exclusive of VAT, of which approximately £400K is to be recouped by the college in relation to direct costs incurred over and above any grant funding received.

A request has been made to retain the balance of funds for investment into the creation of a new sustainable construction facility at 1 Inverness Campus. SFC has confirmed that this request will be considered separately. An update will be provided to the Finance & General Purposes Committee regarding the balance of funds.

Summary of Finance Policies for Board of Management

- **Anti-Fraud and Corruption Policy**

Additional wording added into the Policy Statement to emphasise IC has a zero tolerance culture. In section 3 Scope addition wording added in 3.2 to 3.6

Added new sections 4 (Awareness), 5 (Definitions), Appendix A (Guidance Notes on Inverness College Anti-Bribery Policy) and Appendix B Summary of Bribery Act).

The latter 2 Appendices provide more detail and information

- **Staff Travel and Transport Policy**

No major changes

- **Financial Regulations**

All previous references to Director of Finance changed to Director of Finance and Estates.
All references to Senior Management Team (SMT) changed to Executive Management Team (EMT).
All previous references to Director of Organisational Development changed to HR Manager.
Previously Sections 47 & 48 as below changed

47 Non Grant Funded Income

47.1. This relates to any commercial or non grant funded income including innovation funding and knowledge transfer partnerships.

47.2. Any commercial or non grant funded activity, with the exception of Research and the Early Learning and Childcare centre will be managed by the Business Development Directorate.

47.3. All activity managed by the Business Development Directorate will be subject to the Directorate's agreed processes. All activities will be costed in accordance with resourcing rates agreed with the Finance Manager which will be reviewed on an annual basis. The Director of External Relations will sign off all costings with a view to market rates and sustainability.

47.4. No income generating activities referred to in this section are to be undertaken without the approval of the Director of External Relations

48 Profitability and Recovery of Overhead Costs

48.1 All other income-generating activities must be self-financing or surplus generating unless it is intended that a new course is to be launched as a loss leader. If that is the case, the reason for it must be specified and agreed by the Director of Finance.

Sections 47 & 48 now read as below

47 Non Grant Funded Income

47.1. This relates to any commercial or non grant funded income including innovation funding and knowledge transfer partnerships.

47.2. Any commercial or non grant funded activity, with the exception of Research will be managed by the Vice Principal – Curriculum, Operations, and External Relations areas of responsibility.

47.3. All activity managed by the Vice Principal – Curriculum, Operations, and External Relations will be subject to the College's agreed processes for those areas. All activities will be costed in accordance with resourcing rates agreed with the Finance Manager which will be reviewed on an annual basis. The Vice Principal – Curriculum, Operations, and External Relations or the Operations and Commercial Manager will sign off all costings with a view to market rates and sustainability.

47.4. No income generating activities referred to in this section are to be undertaken without the approval of the Vice Principal – Curriculum, Operations, and External Relations or the Operations and Commercial Manager.

48 Profitability and Recovery of Overhead Costs

48.1. All other income-generating activities must be self-financing or surplus generating unless it is intended that a new course is to be launched as a loss leader. If that is the case, the reason for it must be specified and agreed by the Vice Principal – Curriculum, Operations and External Relations or the Commercial Manager.

48.2. All curriculum provision must contribute to overhead costs. The annual curriculum plan review (CPR) process shall identify courses that do not meet this requirement which must be agreed by EMT during the final stage of the CPR process to approve the curriculum plan. The curriculum plan for the next academic year shall be approved by EMT by the end of the preceding calendar year.

48.3. Proposals for new curriculum courses must be fully costed and agreed using the appropriate further education or higher education costing models prior to submission to the Programme Approval Panel. New curriculum courses approved by the Programme Approval Panel shall be included in the curriculum plan for review IAW with the requirements and process outlined in paragraph 48.2. New curriculum proposals submitted to the Programme Approval Panel after the curriculum plan review is complete shall only be included in the curriculum plan for the next academic year if resource and funding requirements permit. This is subject to approval by the curriculum review panel (Tertiary Education Leaders/Information Systems Manager/Operations and Commercial Manager).

Added to section 58

Sections 58 to 60 updated in line with current APUC guidelines and current government legislation.

58.4. Hospitality procurement will adhere to procurement guidelines wherever practical bearing in mind the requirement for fresh local produce.

Section 61 Purchase orders – Added a Table of delegated levels of authority for approvals are applicable when raising a purchase order.

Previous section 65 Petty Cash now becomes Section 65 Cash Floats

- **Risk Management**

Added 1.4 Compliance

Added 1.5 Review

Any previous references to Senior Management Team (SMT) changed to Executive Management Team (EMT).

Any previous references to Director of Finance changed to Director of Finance and Estates.

Added Section 5 Compliance.

Added Section 6 Monitoring.

Added Section 7 Review.

Appendix 1 & 2 expanded with more detail shown on the risk matrix impact criteria.

Partnership Approach to Risk management changed from

The University uses a standardised risk template and this has been adopted by the College. The template and the methodology for recording risks was developed and agreed through the Finance Directors Practitioners Group and the process for completing and sharing risk registers was endorsed by Academic Partners Principals.

The criteria for measuring the likelihood of risks occurring and the gross impact of risks is attached at Appendix 1.

To

The University uses a standardised risk template, and this has been adopted by the College. The template and the methodology for recording risks was developed and agreed through the Finance Directors Practitioners Group and the process for completing and sharing risk registers was endorsed by Academic Partners Principals.

UHI uses a template risk register format and a standard 5 x 5 (likelihood x impact) scoring methodology. All identified risks are scored twice.

- Firstly, to identify a **gross risk** score based on a judgement of the likelihood of the risk occurring multiplied by a potential impact score assuming no mitigations are applied and.
- Secondly, to identify the **residual risk** score that is based on a re-assessment of the risk but considering any mitigation that is **in place and working** to reduce either the likelihood or the impact.

The criteria for measuring the likelihood of risks occurring and the gross impact of risks is attached at Appendix 1.

- **Value for Money Policy**

Any references to Director of Finance changed to Director of Finance and Estates.

Any references to Senior Management Team (SMT) changed to Executive Management Team (EMT).
Added Section 3 Scope as below .

3. Scope

This policy aims to:

- 3.1. Integrate and enable the adoption of VFM principles within existing management, planning and review processes.
- 3.2. Adopt recognised good practice where this makes good sense.
- 3.3. Ensure that, mainly through the internal audit process, VFM studies are conducted on areas of activity identified as worthy of review.
- 3.4. Provide the framework to benchmark the college's activities against other similar activities and organisations where this is considered useful.
- 3.5. Provide the opportunity to enhance the economy, efficiency and effectiveness of activities.
- 3.6. Promote a culture of continuous improvement.
- 3.7. Ensure that financial savings for the college will be achieved without compromising any aspect towards the quality of service delivery.
- 3.8. Provide evidence to both internal and external observers, that the achievement of VFM is sought in all activities undertaken; and
- 3.9. Communicate to staff the recognition of their continuing obligation to seek VFM for the college as part of their routine activities.

Added into Section 6 Responsibility

6.6. Appendix 1 attached includes the Procurement Step by Step Guide to aid all staff when purchasing goods or services on behalf of UHI Inverness, to ensure procurement regulations are adhered to. This would include hospitality.

Added Section 8 Compliance

8. Compliance

- 8.1. An annual report on the above by the appointed independent auditors will be made to the Audit Committee prior to the December meeting of the Board of Management.
- 8.2. An annual procurement and value for money report is produced by procurement.

Added Section 10 Appendix 1 Procurement Step by Step Guide

Subject/Title:	Anti Fraud and Corruption Policy
Author: [Name and Job title]	Donald Taylor
Meeting:	Board of Management Meeting
Meeting Date:	19 th December
Date Paper prepared:	15/09/2023
Brief Summary of the paper:	The Board of Management is asked to approve the attached Policy. The Policy was approved at EMT on the 16 th August.
Action requested: [Approval, recommendation, discussion, noting]	Approval
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	
Resource implications:	Yes / No If yes, please specify:
Risk implications:	Yes / No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	Yes/No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	

Status – [Confidential/Non confidential]			
Freedom of Information Can this paper be included in “open” business* [Yes/No]			
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

ANTI FRAUD AND CORRUPTION POLICY

REFERENCE: (PL/XX/2XXX/XX)

Style Definition: Heading: Font: Bold

Style Definition: TOC 1: Tab stops: 0.85 cm, Left + 15.9 cm, Right

Style Definition: Body Paragraphs: Font: Bold

Policy Owner	Director of Finance
Lead Officer	<u>Interim</u> Finance Manager
Review Officer	Director of Finance
Date first approved by BoM	XX/XX/XXXX
First Review Date	
Date review approved by BoM	
Next Review Date	
Equality impact assessment	XX/XX/XXXX
Further information (where relevant)	

Formatted: Font color: Text 1

Reviewer	Date	Review Action/Impact

Contents

1. Policy Statement	23
2. Legislative framework/related policies	34
3. Scope	43

4. Awareness	-43
5. Definitions	45
6.	
Compliance	45
7 Monitoring	56
8 Review	5
<u>Appendix A Guidance Notes on the Inverness College Anti-Bribery Policy</u>	<u>6</u>
<u>Appendix B Summary of Bribery Act</u>	<u>12</u>
<u>6</u>	

Formatted: TOC 1

1. Policy Statement

The purpose of this policy is to establish a framework within the College that facilitates the prevention, detection, investigation and elimination of fraud.

Inverness College UHI is committed to taking all practical steps:

- to prevent being subjected to fraud whether perpetrated by staff, members of the Board of Management, students, contractors, suppliers, members of the public, or other public or private sector organisations;
- to facilitate confidential and protected reporting of known or suspected fraud in association with the College's Public Interest Disclosure ("~~Whistle-blowing~~Whistleblowing") policy and procedures;
- to identify and detect any instances of fraud at the earliest opportunity;
- to investigate any instances of fraud, with police involvement where appropriate;
- to take appropriate action to deal with any instances of fraud and with any perpetrators after investigation.

In developing this policy, the College has taken account of existing external guidance and legislation, including the Scottish Public Finance Manual, UK Corporate Governance Code ~~2010~~2010, and Bribery Act 2010.

The College has a zero-tolerance culture to fraud and will treat any instances of fraud or corruption by its employees of the College and any of its subsidiaries (including temporary and agency workers and any unpaid members of staff and voluntary workers) ("employee"), board members, or service provider/contractors (which includes agents and others who represent the College wherever located) ("contractor") as serious breaches of discipline and as potentially criminal acts. Bribery of or by any College employee, board member or contractor for either personal or organisational gain will be similarly treated. The College will co-operate fully with any criminal investigations carried out in responses to fraud, corruption, or bribery.

Robust control mechanisms are in place to prevent fraud. All line managers have a responsibility for maintaining documented control systems and must be seen to be setting an example by complying fully with all procedures, regulations and controls. The effectiveness of controls will be subject to periodic review by the College's internal auditors.

All members of the College community have a responsibility to protect the assets and reputation of the College and are expected to be alert to the potential for fraud.

The College is committed to ensuring that these arrangements keep pace with future developments, in both preventative techniques.

The key elements of the College's approach to combat theft, fraud and corruption are:

- An open and honest culture;
- Adequate preventative measures;
- Confidential methods for reporting;
- Robust systems for detection and investigation;
- Understanding and awareness of systems and procedures within the College;

- Consistent and thorough methods for dealing with perpetrators after investigation.

2. Legislative framework / related policies

- 2.1. The Public Interest Disclosure Act 1998
- 2.2. Bribery Act 2010
- 2.3. Financial Memorandum between UHI and Inverness College UHI (4 January 2016)
- 2.4. The Scottish Public Finance Manual
- 2.5. Related policies
- 2.6. Financial Regulations
- 2.7. Public Interest Disclosure Policy
- 2.8. Procurement Strategy

~~4.1.1.~~

3. Scope

3.1. The policy applies to all members of the Board of Management, staff, contractors, suppliers and students of Inverness College UHI.

3.2. The College recognises that it is already subject to a high degree of scrutiny of its affairs by a variety of parties. This includes the general public, staff, students, Internal Auditors, Board of Management, Scottish Ministers/ the Scottish Government, Members of the Scottish Parliament (MSPS), the Scottish Funding Council (SFC), External Auditor, Education Scotland, HM Revenue and Customs and Audit Scotland.

3.3. The College has internal and external auditors who advise the Board of Management about the adequacy of arrangements for the prevention and detection of fraud and corruption.

3.4 While this external scrutiny assists in protecting against fraud and corruption the College has a clear strategy of its own to mitigate this risk.

3.5. The Board of Management already has procedures in place that reduce the likelihood of fraud/ corruption occurring. These include standing financial procedures, a system of internal control and a system of risk assessment. In addition, the Board of Management will ensure that a risk awareness culture exists by issuing guidance on prevention of fraud.

3.6. It is the responsibility of the College and its' management to maintain adequate and effective internal controls to facilitate detection of fraud. The role of Internal Audit is to evaluate these systems of control. It is not the responsibility of Internal Audit to detect fraud, but to identify potential weaknesses in systems that may give rise to error of fraud.

Formatted: Font: Not Bold

4. Awareness

4.1. The college recognises that the continuing effectiveness of this process depends largely on the awareness and responsiveness of Board members, staff, students and contractors and their willingness to highlight these issues. It is essential that Board members and employees are made aware of this policy and its procedures when they join the College and either receive a copy for inclusion in their personal records or have access to this policy online and, in addition, have ready access to all other relevant documents, policies and procedures, which regulate the College's activities.

Formatted: Font: Not Bold

4.2 Action will be taken on a regular basis to remind both Board Members staff of the importance the College places on avoiding and preventing fraud, bribery, and corruption.

5. Definitions

~~5.1. For practical purposes, so far as this document is concerned, fraud may be taken to mean the use of deception with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party. The essential elements of fraud are dishonesty, which can include non-disclosure of important facts, making false representations, and dishonestly abusing their power and deprivation or risk of deprivation. This includes any fraudulent crime conducted electronically or via a computer or computer data. Fraud is defined in this policy as "any act of wilful dishonesty to gain individual or collective advantage." It is taken to include theft, misuse of property, corruption, the alteration of financial or other records or any unauthorised act which results directly or indirectly in financial gain to the perpetrator or to any third party.~~

Formatted: Font: Not Bold

~~5.2 Corruption is generally the abuse of entrusted power for private gain which includes the dishonest influence of actions and decision.~~

~~5.3. Bribery is either giving or receiving an inducements or reward offered, promised, or provided to gain personal, commercial, regulatory, or contractual advantage. A summary of the Bribery Act as well as the relevant definition of terms can be found at Appendix A~~

Commented [FM1]: Or alternatively - For practical purposes, so far as this document is concerned, fraud may be taken to mean the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party. The essential elements of fraud are dishonesty, which can include non-disclosure of important facts, and deprivation or risk of deprivation.

The term is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.

~~5.4 The term is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. This may involve:~~

Formatted: Font: Not Bold

- Falsification or alteration of accounting records or other documents.
- False accounting and/or making fraudulent statements with a view to personal gain or gain for another: for ~~example~~, falsely claiming overtime, travel and subsistence, sick ~~leave~~, or special leave (with or without pay).
- Misappropriation of cash, ~~assets~~, or theft.
- Suppression or omission of the effects of transactions from records or documents.
- Recording transactions which have no substance.
- Wilful misrepresentations of transactions.

~~5.5 This policy also includes:~~

- Theft - including any misappropriation, stealing, and damage, malicious or otherwise, incurred ~~in the course of~~ during a theft, and actual or attempted break-in.
- Computer misuse/fraud - where information technology equipment has been used to manipulate programs or data dishonestly (for example, by altering, ~~substituting~~, or destroying records, or creating spurious records), or where the use of an IT system was a material factor in the perpetration of fraud. Theft or fraudulent use of computer time and resources, including unauthorised personal browsing on the Internet, is included in this definition.
- Corruption - where someone is influenced by bribery, ~~payment~~, or benefit in kind to unreasonably use their position to give some advantage to another (for example awarding of contracts where there is a personal advantage). ~~Bribery is also covered in the College's Anti-Bribery Policy.~~

Commented [FM2]: Deleted as this policy not yet prepared.

6. Compliance

6.1 This policy is a cross wide college policy; and all staff must work to meet the requirements outlined within the policy. Compliance with the Policy will be monitored through regular internal and external audits, with outcome reports being reported to the Audit Committee.

Formatted: Font: Not Bold

7. Monitoring

7.1 Each college policy will be ~~monitored~~monitored, and its implementation evaluated. Appropriate procedures for monitoring and evaluation are the responsibility of the Lead Officer.

Formatted: Font: Not Bold

Formatted: Font: Not Bold

8. Review

8.1 This policy will be reviewed in (3 years from now)

Formatted: Font: Not Bold

APPENDIX A

Guidance Notes on the Inverness College Anti-Bribery Policy

These Guidance Notes supplement the College's Anti-Bribery Policy. They are designed to assist staff on the practical application of the Policy. In addition, they include important obligations on specific areas, which staff must adhere to.

1. Frequently Asked Questions about the Bribery Act

1.1. It is customary to provide gifts in some countries outside of the UK when visiting or meeting with public officials. Can College staff offer gifts to their counterparts at an overseas college?

The fact that something is a local custom is not a defence under the Bribery Act, so a cautious approach is required to ensure any gift or other advantage that is offered overseas is not construed as a bribe based on UK standards of conduct. Secondly, in this scenario it is possible that a member of an overseas college will be classed as a "foreign public official" under the Bribery Act. If so, it is very easy to fall foul of the law. Any financial or other advantage offered to them will be seen as a bribe if the offeror intends to influence the official and intends to obtain or retain any business advantage. This guidance does not however preclude the College or its staff from giving small, low value gifts seen as a 'mark of respect' to other public officials.

1.2. Can gifts and hospitality be accepted from private sector companies with whom the College has a business relationship or may do in future? What about sponsorship?

Care has to be exercised that no gift or hospitality could be considered excessive or lavish. Normal business meals and modest entertainment is normally acceptable where there is a legitimate purpose for the hospitality - such as to foster cordial relations or for reasonable public relations. No hospitality should be accepted if it could be construed as intended to induce a member of staff to perform their functions improperly. (See Policy on Receipt of Gifts and Hospitality). In relation to sponsorship, similar principles apply. Care should be exercised that the sponsorship does not improperly induce members of the College to perform their functions improperly. This could include where it compromises academic integrity or influences the outcome of a research project.

1.3. Can we engage agents to recruit international students to the College?

Yes, but a number of compliance steps must be taken. The use of overseas agents involves high risks to an organisation, whether for recruitment or other purposes. The College will be liable for any corrupt acts by anyone performing services on its behalf. The risks of engaging an agent in a particular case must be assessed and enhanced

due diligence undertaken about the suitability of the agent and the nature of the services they are providing to the College. Further guidance on these steps is set out below.

1.4. The College undertakes an annual research project in a jurisdiction outside of the UK with a poor reputation for corruption. The project leader needs to transport equipment to the overseas location for the project, which will be checked by local customs officials. What steps should the project leader consider?

The project leader should consider in advance the risk that members of staff or others acting on behalf of the College will be vulnerable to demands for corrupt payments, such as facilitation payments. Staff will need guidance in advance on strategies to resist any such demands. The project leader should also consider any preventative measures that can be taken in advance, such as allowing adequate time for delays in the delivery of equipment whilst any demand for a facilitation payment is resisted.

1.5. The family of a student who is applying to the College offers to provide the College with a substantial donation to its development fund in return for a place at the College being offered to the student. Is this caught by the Bribery Act?

Yes. This situation clearly involves a financial advantage being offered to the College, which is intended by the family to induce the admissions department to perform their functions improperly. It does not matter what decision is in fact reached over offering the student a place or not. The donation should be refused because of the basis on which it was offered. Donations can be bribes in other less obvious circumstances. The College due diligence procedures should always be followed to ensure a donation does not involve someone misusing their position or being induced to do so.

2. Further Guidance on Gifts Entertainment and Hospitality

All members of staff should refer to the Policy for Staff on the Receipt of Gifts and Hospitality.

This guidance note is intended to supplement the provisions of the above policy. It applies to all gifts, hospitality and entertainment that members of staff give or receive in the context of their activities for the College. In cases where a member of staff pays for a gift, entertainment or hospitality, but it is not reimbursed by the College, this guidance note remains applicable in this context.

The following overarching principles in relation to gifts, entertainment and hospitality (whether given or received) are particularly important for staff to consider in the context of potential corruption risks:

Expenditure should always be reasonable and proportionate (having regard in particular to the recipient).

Expenditure should be in accordance with the Policy for Staff on the Receipt of Gifts, Hospitality; and any necessary approvals sought in accordance with that policy; and records kept in accordance with the policy.

The recipient must always be entitled to receive the gift, entertainment or hospitality under the law of the recipient's country.

3. Charitable and Political Donations by the College

All charitable donations should be recorded accurately in the College's financial records and accounts.

Requests for charitable donations can sometimes mask corrupt activity by others. No charitable donations should be made if these could be construed as improperly influencing another party with whom the College has a business relationship. Should a member of staff have any ethical concerns about a proposed charitable donation, this should be reported immediately to the COO/Secretary.

The College does not under any circumstances make donations to political parties.

4. Philanthropic Giving

All donations made to the College by benefactors or others wishing to support the College's activities must be considered in the light of the Bribery Act. Donations of this kind can sometimes mask corrupt activity. No donations should be accepted without due diligence procedures being followed in respect of the purpose of the donation and the background of the donor, amongst other steps. The level of due diligence required will be proportionate to any potential corruption risk identified. No donation should be accepted if it could be construed as improperly influencing the College or another person. Should a member of staff have any ethical concerns about a proposed donation, this should be reported immediately to the COO/Secretary.

5. Honorary Degrees and Fellowships

Under no circumstances may an honorary degree or fellowship be awarded as an improper inducement to the individual recipient to provide additional services to the College. In addition, the College's Nominations Committee will oversee the award of honorary degrees and fellowships and will ensure the guidance in this policy is taken into account when considering nominations for such degrees.

6. Agents, Other Third Parties, and Joint Ventures

In some parts of the College's commercial activities, it needs to engage agents and other intermediaries.

All appointments of agents and other parties who provide the College with services must follow risk-based due diligence procedures. This includes where the College enters in to any form of partnership with another organisation or a joint venture arrangement.

For the appointment of any overseas agents, a high level of due diligence is required. A non- exhaustive list of steps that must be considered is set out in Section 7 below.

Advice should be sought from COO/Secretary on due diligence steps required for any joint venture, whether in the UK or overseas. All appointments of agents and joint venture partners must be monitored and reviewed on a periodic basis and ongoing due diligence procedures adopted, proportionate to any corruption risks that have been identified.

Any agents or other parties who are performing services for, or on behalf of the College, will be expected to agree to a contractual clause which confirms that they will comply with the College's Anti-Bribery Policy or adhere to an equivalent policy, standard or other procedures they may have in place to prevent bribery. This clause

will confirm that any breach of these anti-corruption obligations can lead to termination of the contractual relationship.

7. Due Diligence

Appropriate risk-based due diligence must be conducted in relation to any party outside of the College who is performing services for it or on its behalf. Enhanced due diligence should be conducted in relation to overseas agents and joint venture partners of the College. The following guidance indicates the steps that should be considered in planning and conducting Due Diligence in these types of relationship.

Require the party/agent to provide details of the party/agent's ownership; details of senior management of the party/agent; a copy of CVs of key personnel performing services for the College; details of referees for the party/agent and key personnel who will be providing services under the proposed agreement; details of other directorships held, existing partnerships, and third- party relationships, and any relevant judicial or regulatory findings about the party/agent or key personnel of the party/agent, and details of the jurisdictions in which the agent operates.

Undertake research, including reasonable internet research (dependent on risk), on the party/agent and any individuals who have a degree of control if the agent is a corporate entity.

Check independently that the party/agent does not appear on any applicable sanctions list or have outstanding court actions or judgments against it.

Make enquiries with any relevant authorities, including contacting a commercial attaché at the embassy in the territory where the party/agent operates, to verify information obtained and seek any independent background information about the party/agent's reputation.

Take up references and assess responses received.

Conduct any further enquiries of the party/agent to clarify any matters arising from the information provided, including arranging a face to face meeting if required.

Request and review copies of the party/agent's anti-bribery policies and any relevant procedures they operate to prevent bribery and corruption.

Assess relevant commercial considerations for the College's activities, e.g.:

- is the appointment necessary?
- does the party/agent have the required expertise to provide the services?
- is the party/agent going to interact with a public official, or are there any other connections between a party/agent and a public official?
- are the proposed payment terms of the party/agent reasonable and in accordance with the market rate?
- have appropriate steps been taken to consider alternative appointments/competitors to this party/agent?

8. Facilitation Payments

Facilitation payments are typically small unofficial payments paid to speed up an administrative process or secure a routine government action by an official. They are more common in certain overseas jurisdictions in which the College conducts its activities, but it is possible that they could arise in the UK.

Facilitation payments are treated as bribes by the Bribery Act and are prohibited by this Policy. Examples of when such payments may be requested include:

- To obtain or expedite a permit, licence or other official document or approval.
- To facilitate provision of utilities, such as connecting water, electricity, gas or telephone services
- At border controls or crossings to allow safe or prompt entry or exit from a jurisdiction
- To avoid unwarranted delays when goods are held by a customs official
- To ensure personal security or preservation of property from law enforcement officials

Facilitation payments should be contrasted with official, lawful payments (typically to an organisation rather than an individual) to expedite certain functions (e.g., where there is an official system to choose a premium fast track service to obtain a passport). Sometimes demands for facilitation payments are forms of extortion (e.g., unless the demand is met, a person's safety or liberty is placed in jeopardy). However, identifying when a payment is a lawful, official payment and when it is a facilitation payment, and a bribe is not always easy. In these cases, it is important for staff to seek confirmation wherever possible of the lawfulness of the payment from an independent source and seek additional guidance from the COO/Secretary immediately.

If it is not possible to undertake the above steps and if a member of staff is unsure as to the validity of an official's request for a payment, the steps below should be followed as far as they are applicable and as far as it is possible to do so:

The member of staff should:

- Contact their line manager.
- Ask the official for proof of the validity of the fee.
- Request that a receipt be provided confirming the validity of the payment.
- If no proof of validity will be provided, politely decline to make the payment and explain they cannot make the payment because of the College's policy and anti-bribery laws.
- If possible, ask to see the official's supervisor

- Make a full note of the request, the circumstances and the parties involved.
- At all times remain calm, respectful and polite.

The College policy is that it strictly prohibits any kind of facilitation payments made by members of staff or third parties acting on its behalf. However, if a member of staff is in fear for their safety or at risk of loss of liberty, they should not refuse the demand for a payment. In all circumstances members of staff must report any demand for facilitation payments immediately to the COO/Secretary for advice and guidance

APPENDIX B

Summary of Bribery Act

1. What Is Bribery and Corruption?

The Bribery Act defines corruption offences very widely. Most offences apply equally to private and public sector activities. This Appendix sets out further details of the offences and how they may apply to the College.

As a summary of the key provisions in the UK law, members of staff should follow these three principles:

- Do not make payments to someone (or favour them in any other way) if you know that this will involve someone in misuse of their position.
- Do not misuse your position in connection with payments (or other favours) for yourself or others.
- Do not deliberately use advantages to try to influence foreign public officials for business reasons. If you need to promote the College's business with a foreign public official, always check in advance with your Head of School/Support Department.

A bribe does not need to be a monetary sum. It can be any form of advantage: e.g., lavish hospitality or gifts; an offer of employment; or the provision of services free of charge or with a substantial discount. A person who is offered or agrees to accept a bribe does not need to benefit personally.

Actual payment of a bribe does not need to occur for there to be a criminal offence. An offer or request would be sufficient.

Sometimes offering or making a payment (or giving some other favour such as lavish hospitality) is an act of bribery in itself – i.e., where this is improper without the recipient needing to do anything else as a consequence.

2. How Does Corruption Affect The College?

Risks of corruption can arise in a wide range of the College's activities and its interaction with third parties. Some examples of these are as follows:

- International operations
- Recruitment of students and awards of degrees
- Gifts and donations to or from the College or its staff
- College Fundraising Activities
- Sponsorship and partnerships with private sector organisations in the UK or overseas and other commercial activities

- Procurement processes across the College and relationships involving estate and property management.
- Appointment of agents or representatives in the UK or overseas who perform services for or on behalf of the College.
- Relationships with other academic institutions, regulatory or funding bodies
- Field trips and overseas research in jurisdictions where there are particular corruption risks.

The College will undertake periodic risk assessments of its activities, including risks relating to: the sector in which it operates; its international business activities; its existing processes for gifts and hospitality and donations; its relationships with a wide range of third parties in the UK and overseas who provide services to it or on its behalf; its procedures for procurement and other internal policies; and its other business structures, such as private sector joint ventures or joint research collaborations.

3. What is the Law?

The offences under the Bribery Act are extensive in scope, broadly defined and, in some circumstances, also allow for crimes committed anywhere in the world to be prosecuted in UK courts. The College's standards therefore apply to conduct that occurs both in the UK and in any activity it undertakes abroad.

The UK law has serious consequences for anyone found guilty of an offence. For individuals, a maximum prison sentence of ten years and/or an unlimited fine can be imposed; for commercial organisations, an unlimited fine can be imposed. Other measures can include the ability to confiscate assets, where these are found to be the proceeds of criminal activity including corruption.

The Bribery Act includes a new offence of failure of commercial organisations to prevent bribery. In light of its various commercial activities, the College will be treated as a commercial organisation for this purpose even though it has primarily educational aims.

4. Offences under the Bribery Act

The Bribery Act contains four main offences:

- **Paying bribes** - Can apply to members of staff and the College.
- **Receiving bribes** - Can apply to members of staff and the College.

- **Bribery of a foreign public official** - Can apply to members of staff and the College.
- **Failure of a commercial organisation to prevent bribery** - Can apply to the College and its subsidiary companies.

In addition, if a senior officer of a commercial organisation consents to or connives in an act of bribery by that organisation, they can be separately prosecuted.

As a reference guide, set out below are brief explanations of what each of the four main offences mean.

4.1 Paying bribes

It is an offence if a person offers, promises or gives a financial or other advantage with the intention of inducing another person to **perform a function or activity improperly** or to reward that person for doing so.

It is not necessary to prove that this person intended this consequence in all cases; it is also an offence if the person knows or believes that acceptance of the advantage by another is in itself an improper performance of their function or activity.

4.2 Receiving bribes

It is an offence if a person requests, or agrees to accept, or receives a financial or other advantage intending that a **function or activity** should be **performed improperly** as a result.

It is also an offence:

- Where the request or receipt of the advantage is in itself an improper performance of a function or activity;
- Where the request or receipt is a reward for the person's or someone else's improper performance in the past;
- Where their improper performance takes place in anticipation or as a consequence of a request or receipt of an advantage.

In these other scenarios, it does not matter whether the person knows or believes that the performance of a function or activity is improper.

With both of the above offences, it does not matter that no money changed hands, or that a person received no personal benefit or enrichment.

Both offences can also apply to acts of bribery that take place outside of the UK, where the person or organisation paying or receiving a bribe has a close connection to the UK. This includes all UK citizens, other persons ordinarily resident in the UK, and UK incorporated companies.

4.3 What activities do these offences apply to?

The offences could apply to any function or activity involving the College and any activities of its staff, connected with a business, performed in the course of employment, or on behalf of the College or a subsidiary company. Examples include the College's dealings with:

- private sector businesses, or third parties including subcontractors or agents.
- other publicly funded organisations, grant giving bodies, and relevant public bodies.
- service providers or agents
- individuals, including students and prospective students, donors and other sponsors.

4.4 What does improper performance mean?

Whether an activity or function is **performed improperly** will be measured on an objective basis, not necessarily on a person's own perception of the circumstances of the activity. The test will be whether a function has been performed in breach of how a reasonable person in the UK would expect it should be performed. This means customary or historic practices will not necessarily be acceptable.

4.5 Bribery of a foreign public official

It is an offence if a person offers or gives a financial or other advantage to a foreign public official with the intention of influencing the foreign public official and to obtain or retain business or a business advantage. Foreign public officials include persons performing functions at state owned or controlled enterprises and agencies - and therefore could potentially include those working for public universities outside of the UK.

The College has identified that it has relevant international activities where it may have dealings with foreign public officials, including:

- in territories where it engages overseas agents for student recruitment
- in territories where members of the College undertake research or other academic activities from time to time

The Bribery Act contains no exemption for "facilitation payments" (see also the

section of this Guidance Notes to the College Policy relating to Facilitation Payments).

If a member of staff of the College in the UK or overseas needs to promote the College's business with a foreign public official, the member of staff must contact the COO/Secretary in advance to confirm what steps are appropriate in any dealings they intend to have with the foreign public official.

4.6 Failure of commercial organisations to prevent bribery.

It is an offence for the College in relation to its commercial activities if a person associated with the College bribes another person intending to:

- obtain or retain business for the College; or
- obtain or retain an advantage in the conduct of business for the College.

A person is associated with the College if they perform services for or on behalf of the College. This covers a wide category of people where the College has a potential liability for their acts. It does not matter in what capacity they are acting. Associated persons include all employees of the College as well as other persons outside of the College such as agents, joint ventures to which the College is party, and those with whom the College contracts to perform services.

Advancing Equality of Opportunity	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Promoting Good Relations.	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I

Step 3

Sustainability	N/I
----------------	-----

Step 4

No Action to be taken

Monitoring of contract management and associated costs including the identification of cost savings and cost avoidance. Local cost savings data will be reported to EMT. National cost savings will be reported by the APUC. An annual report on the above by the appointed independent auditors will be made to the Audit Committee prior to the December meeting of the Board of Management

Summary of EIA Outcome – please tick

- No further action to be carried out
- Amendments or changes to be made
- Proceed with awareness of adverse impact
- Abandon process – Stop and Rethink

Please forward completed EIA forms to the Quality Unit

Subject/Title:	Staff Travel and Transport
Author: [Name and Job title]	Donald Taylor
Meeting:	Board of Management
Meeting Date:	19th December
Date Paper prepared:	11/12/2023
Brief Summary of the paper:	Board are asked to approve the attached Policy. The Policy was approved at EMT on the 16 th August and at F&GP on the 15th September.
Action requested: [Approval, recommendation, discussion, noting]	Approval
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	
Resource implications:	Yes / No If yes, please specify:
Risk implications:	Yes / No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	Yes/No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	

Status – [Confidential/Non confidential]			
Freedom of Information Can this paper be included in “open” business* [Yes/No]			
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Impact Identified. P, N, N/I									
Eliminating Discrimination	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Advancing Equality of Opportunity	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Promoting Good Relations.	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I

Step 3

Sustainability	P
----------------	---

Step 4

No Action to be taken

To be reviewed by EMT

Summary of EIA Outcome – please tick

- No further action to be carried out
- Amendments or changes to be made
- Proceed with awareness of adverse impact
- Abandon process – Stop and Rethink

Please forward completed EIA forms to the Quality Unit

UHI | INVERNESS

STAFF TRAVEL AND TRANSPORT POLICY

REFERENCE: **PL/CS/2020/003**

Policy Owner	Director of Finance
Lead Officer	Director of Finance
Review Officer	Finance Manager
Date first approved by BoM	March 2020
Policy updated	August 2023
First Review Date	March 2023
Date review approved by BoM	August 2023
Next Review Date	August 2026
Equality impact assessment	August 2023
Further information (where relevant)	

Reviewer	Date	Review Action/Impact

Contents

1. Policy Statement	3
2. Legislative framework/related policies	3
3. Scope	3
4. Compliance	3
5. Monitoring	3
6. Review	3

1. Policy Statement

The college should ensure that procurement of any transport and travel is undertaken in a way that represents good value and is in line with its commitment to reduce impact on the environment.

Staff travel should be kept to a minimum, employing technological alternatives where available.

Where staff travel is deemed by the staff member and the budget holder to be absolutely necessary, both are responsible for ensuring that the most cost effective option is taken and that journeys are planned to maximise the investment in travel.

Budget holders and staff must comply with the travel and transport procedure and should ensure that there is sufficient budget allocated for business travel, prior to authorising.

2. Legislative framework / related policies

- 2.1. Procurement Reform (Scotland) Act 2014
- 2.2. Scottish Government Sustainable Procurement Duty
- 2.3. EU General Data Protection Regulation 2016/679
- 2.4. ICUHI Finance Regulations.
- 2.5. HMRC Rules for Business Travel Mileage.
- 2.6. ICUHI Job Descriptions.
- 2.7. ICUHI Procurement Strategy
- 2.8. ICUHI Sustainable Procurement Policy

3. Scope

- 3.1. This policy and associated procedures cover all business travel.

4. Compliance

- 4.1. This policy is a college-wide policy; and all staff must work to meet the requirements outlined within the policy.
- 4.2. Compliance with the Policy will be monitored through monthly budget monitoring and regular audits, with outcomes being reported to the appropriate SMT and other relevant board committees including Audit.

5. Monitoring

- 5.1. This policy will be monitored, and its implementation evaluated, primarily through budget monitoring processes.
- 5.2. The budgetary impact of business travel will be reviewed.

6. Review

- 6.1. This policy will be reviewed every three years.

Subject/Title:	financial Regulations
Author: [Name and Job title]	Donald Taylor
Meeting:	Board of Management
Meeting Date:	19 th Dec
Date Paper prepared:	14/11/2023
Brief Summary of the paper:	Updated Financial Regulations for 2023 – massive review of document due to the length it has been out of date.
Action requested: [Approval, recommendation, discussion, noting]	Approval
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	
Resource implications:	Yes / No If yes, please specify:
Risk implications:	Yes / No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	Yes/No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	

Status – [Confidential/Non confidential]			
Freedom of Information Can this paper be included in “open” business* [Yes/No]			
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Policy/Procedure/Strategy: Financial Regulations Policy

Author/Owner: Finance Shared Services – Donald Taylor – Director of Finance

Signature: Donald Taylor

Review Due: 14/01/2024

Department/Section: Finance Shared Services

Date: 14/09/2023

Date of Assessment: 114/09/2023

Step 1

Aim of proposed activity/decision/new or revised policy or procedure:

This document sets out the UHI Inverness’s Financial Regulations. It translates into practical guidance, the UHI Inverness’s broad policies relating to financial control. These Financial Regulations are subordinate to UHI Inverness’s instruments and articles of governance and to any restrictions contained within UHI Inverness’s Financial Memorandum. The purpose of these Financial Regulations is to provide control over the totality of the UHI Inverness’s resources and provide management with assurances that the resources are being properly applied for the achievement of the UHI Inverness’s Strategic Plan and business objective.

- New
- Revised
- Existing

Who will be affected?	Who will be consulted?	Evidence available:
Staff, members of the Board of Management, FGPC	EMT. The Board of Management. FGPC	Complies with current best practice and similar Financial Regulations for UHI and other similar organisations.

Step 2

Potential Positive/Negative/Neutral Impact Identified. P, N, N/I	Age	Disability	Gender Reassignment	Marriage/Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Eliminating Discrimination	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Advancing Equality of Opportunity	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Promoting Good Relations.	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I

Step 3

Sustainability	This has a positive impact as the Financial Regulations and other associated policies do not focus solely on commercial and financial matters.
----------------	--

Step 4

No Action to be taken

To be reviewed by EMT

Summary of EIA Outcome – please tick

- No further action to be carried out
- Amendments or changes to be made
- Proceed with awareness of adverse impact
- Abandon process – Stop and Rethink

Please forward completed EIA forms to the Quality Unit

UHI | INVERNESS

FINANCIAL REGULATIONS

REFERENCE: **PL/CS/2018/005**

Policy Owner	Director of Finance <u>and Estates</u>
Lead Officer	Interim Assistant Finance Director
Review Officer	Accountant
Date first approved by BoM	10 December 2007
First Review Date	22 June 2009
Date review approved by BoM	18 December 2018
Next Review Date	June 2019
Equality impact assessment	12 September 2012
Further information (where relevant)	

Reviewer	Date	Review Action/Impact
Finance Officer	22/09/2009	Review approved by BoM
Finance Officer	07/10/2010	Review approved by F&GP Committee
Finance Officer	23/11/2012	Review approved by Audit Committee
Accountant	26/10/2017	Review approved by BoM

Accountant	18/12/2018	Review approved by BoM
------------	------------	------------------------

Changes / Amendments to 09/11/23

All previous references to Director of Finance changed to Director of Finance and Estates.
All references to Senior Management Team (SMT) changed to Executive Management Team (EMT).
All previous references to Director of Organisational Development changed to HR Manager.
Previously Sections 47 & 48 as below changed
47 Non Grant Funded Income

47.1. This relates to any commercial or non grant funded income including innovation funding and knowledge transfer partnerships.

47.2. Any commercial or non grant funded activity, with the exception of Research and the Early Learning and Childcare centre will be managed by the Business Development Directorate.

47.3. All activity managed by the Business Development Directorate will be subject to the Directorate's agreed processes. All activities will be costed in accordance with resourcing rates agreed with the Finance Manager which will be reviewed on an annual basis. The Director of External Relations will sign off all costings with a view to market rates and sustainability.

47.4. No income generating activities referred to in this section are to be undertaken without the approval of the Director of External Relations

48 Profitability and Recovery of Overhead Costs

48.1 All other income-generating activities must be self-financing or surplus generating unless it is intended that a new course is to be launched as a loss leader. If that is the case, the reason for it must be specified and agreed by the Director of Finance.

Sections 47 & 48 now read as below

47 Non Grant Funded Income

47.1. This relates to any commercial or non grant funded income including innovation funding and knowledge transfer partnerships.

47.2. Any commercial or non grant funded activity, with the exception of Research will be managed by the Vice Principal – Curriculum, Operations, and External Relations areas of responsibility.

47.3. All activity managed by the Vice Principal – Curriculum, Operations, and External Relations will be subject to the College's agreed processes for those areas. All activities will be costed in accordance with resourcing rates agreed with the Finance Manager which will be reviewed on an annual basis. The Vice Principal – Curriculum, Operations, and External Relations or the Operations and Commercial Manager will sign off all costings with a view to market rates and sustainability.

47.4. No income generating activities referred to in this section are to be undertaken without the approval of the Vice Principal – Curriculum, Operations, and External Relations or the Operations and Commercial Manager.

48 Profitability and Recovery of Overhead Costs

48.1. All other income-generating activities must be self-financing or surplus generating unless it is intended that a new course is to be launched as a loss leader. If that is the case, the reason for it must be specified and agreed by the Vice Principal – Curriculum, Operations and External Relations or the Commercial Manager.

48.2. All curriculum provision must contribute to overhead costs. The annual curriculum plan review (CPR) process shall identify courses that do not meet this requirement which must be agreed by EMT during the final stage of the CPR process to approve the curriculum plan. The curriculum plan for the next academic year shall be approved by EMT by the end of the preceding calendar year.

48.3. Proposals for new curriculum courses must be fully costed and agreed using the appropriate further education or higher education costing models prior to submission to the Programme Approval Panel. New curriculum courses approved by the Programme Approval Panel shall be included in the curriculum plan for review IAW with the requirements and process outlined in paragraph 48.2. New curriculum proposals submitted to the Programme Approval Panel after the curriculum plan review is complete shall only be included in the curriculum plan for the next academic year if resource and funding requirements permit. This is subject to approval by the curriculum review panel (Tertiary Education Leaders/Information Systems Manager/Operations and Commercial Manager).

Formatted: Font: Bold

Added to section 58

Sections 58 to 60 updated in line with current APUC guidelines and current government legislation.

58.4. Hospitality procurement will adhere to procurement guidelines wherever practical bearing in mind the requirement for fresh local produce.

Section 61 Purchase orders – Added a Table of delegated levels of authority for approvals are applicable when raising a purchase order.

Previous section 65 Petty Cash now becomes Section 65 Cash Floats

CONTENTS

INTRODUCTION AND BACKGROUND	8
1 General Provisions.....	8
2 Status of Financial Regulations	8
CORPORATE GOVERNANCE	9
3 Responsibility of the Principal and Chief Executive	9
4 Responsibility of the Director of Finance.....	11
5 Responsibility of Budget Holders	11
6 Staff Responsibility	12
7 Risk Management.....	12
8 Public Interest Disclosure (Whistle-blowing).....	12
9 Code of Conduct	13
10 Receiving gifts or hospitality.....	13
11 Financial Planning.....	13
12 Resource Allocation.....	14
13 Budget Preparation	14
14 Capital Expenditure Programme.....	14
15 Overseas Activity	15
16 Other Major Developments	15
17 Financial Control	15
18 Financial Information	16
19 Changes to the Approved Budget.....	16
20 Virement.....	16
ACCOUNTING ARRANGEMENTS.....	16
21 Financial Year	16
22 Basis of Accounting.....	17

23	Format of the Financial Statements	17
24	Annual Reporting Requirements.....	17
25	The Public Services Reform (Scotland) Act 2010	17
26	Capitalisation and Depreciation	17
27	Accounting Records	18
28	Public Access	18
29	Taxation	19 198
AUDIT REQUIREMENTS		19
30	General.....	19
31	External Audit.....	19
32	Fraud and Corruption.....	20
33	Value for Money.....	20
34	Other Auditors	20
TREASURY MANAGEMENT		20
35	Treasury Management	20 209
36	Appointment of Bankers and Other Professional Advisors.....	21
37	Banking Arrangements	21
INCOME		22
38	General.....	22
39	Maximisation of Income.....	22
40	Receipt of Cash, Cheques and Other Negotiable Instruments	22
41	Collection of Debts.....	23
42	Student Fees.....	23
43	Discretionary Fund and Childcare Payments.....	23 234
GRANTS AND CONTRACTS		24
44	General.....	24
45	Grant and Contract Conditions	24 245
OTHER INCOME GENERATING ACTIVITY.....		25

46 Private Consultancies and Other Paid Work.....	25
47 Non Grant Funded Income	25
48 Profitability and Recovery of Overhead Costs.....	26
49 External business and management consultancy contracts	26
50 Deficits	26
51 Retention of income	26
52 Additional Contributions to Departments	27
INTELLECTUAL PROPERTY RIGHTS AND PATENTS	27
53 General.....	27
54 Patents	27
55 Intellectual Property Rights.....	27
EXPENDITURE	28
56 General.....	28
57 Delegation to Budget Holders	28
58 Procurement	28
59 Tender Management (Tenders and Quotations)	29
60 Contracts.....	31
61 Purchase Orders	31
62 Receipt of Goods.....	32
63 Payment of Invoices.....	32
64 Reporting of Expenditure	33
65 Cash Floats.....	33
66 Other Payments.....	33
67 Late Payment Rules	34
68 Leasing.....	34
PAY EXPENDITURE.....	34
69 Remuneration	34

70	Appointment of Staff	34 5
71	Salaries and Wages	35 5
72	Superannuation Schemes	35
73	Travel, Subsistence and Other Allowances	36 6
74	Giving Gifts and Hospitality	36 6
75	Overseas Travel.....	36 7
76	Expenses for members of the Board of Management.....	37 7
77	Severance and Other Non-Recurring Payments.....	37 7
	ASSETS	37 7
78	Land, Buildings, Fixed Plant and Machinery.....	37 7
79	Fixed Asset Register	37 8
80	Property Register	38 8
81	Stocks and Stores	38 8
82	Safeguarding Assets.....	38 8
83	Personal Use.....	38 8
84	Asset Disposal.....	38 9
	FUNDS ON TRUST	39 9
85	Gifts, Benefactions and Donations	39 9
86	Student Support Funds	39 9
87	Trust Funds.....	39 9
88	Voluntary Funds	39 9
	OTHER.....	39 9
89	Insurance	39 40
90	Companies, Partnerships, Joint Ventures and Other Charitable Vehicles	40 40
91	Security	40 40
92	Provision of Indemnities or Guarantees	41 4
	APPENDIX A - Financial Memorandum.....	42 2
	APPENDIX B - Key Contacts in Finance	43 3

APPENDIX C - Capital Expenditure Appraisal.....44

APPENDIX D - Summary of Protocols for Proposed Major Developments.....46

APPENDIX E - Internal Audit Responsibilities.....47

APPENDIX F – Procurement Thresholds.....48

APPENDIX G – ~~Delegated Delegated Financial~~ Levels of authority nancial for approval of purchase ordersLimits and Annual Reporting Requirements 52

APEENDIX H – Purchasing -Contract strategy approval levels 53-52

APPENDIX I – Procurement Step by Step Guide 54

APPENDIX J – Delegated Financial Limits and Annual Reporting Requirements 55

Formatted: Indent: Left: 0.39 cm, Space Before: 12 pt,
Tab stops: Not at 16.34 cm

INTRODUCTION AND BACKGROUND

1 General Provisions

1.1. The Further and Higher Education (Scotland) Act 1992, ('the Act') created a framework for Further Education Colleges offering both full-time and part-time education to function as free corporate bodies, with powers to employ staff and to own land and buildings. From 1 April 1993, they were funded directly from Government, through the Scottish Funding Council (SFC), and taken out of local authority/ education authority controls. In October 2010, the UK Office for National Statistics (ONS) took the decision to reclassify further education colleges throughout the UK as public bodies, with the result that they are now treated as part of central government for budgeting, reporting, and accounting purposes.

1.2. The Financial Memorandum with Fundable Bodies in the College Sector sets out the formal relationship between the SFC and college sector fundable bodies and the requirements with which funded bodies must comply as a term and condition of SFC grant. The Scottish Further Education Funding Council issued this memorandum effective from 1 December 2014. The current Financial Memorandum for Inverness College UHI is between UHI (the Regional Strategic Body) and Inverness College UHI and came into effect on 1 January 2016 (Appendix A). The Board of Management is responsible for ensuring that the conditions of grants are met. As part of that process, the College must ensure that it has sound systems of internal financial and management controls. The Financial Regulations of the College form part of this overall system of accountability and control.

1.3. The Financial Regulations should be read in conjunction with publications and guidelines from the following resources:

- Statement of Recommended Practice
- Audit Scotland
- Accounting Standards
- Scottish Parliament Audit Committee
- HE College Administrative Schemes
- Scottish Funding Council (SFC)
- Scottish Public Finance Manual
- Finance Manual – Inverness College
- Inverness College UHI Board of Management Articles of Governance
- HM Treasury Financial Reporting Manual

2 Status of Financial Regulations

2.1. This document sets out the College's Financial Regulations. It translates into practical guidance, the College's broad policies relating to financial control.

- 2.2. These Financial Regulations are subordinate to Inverness College's instruments and articles of governance and to any restrictions contained within Inverness College's Financial Memorandum.
- 2.3. The purpose of these Financial Regulations is to provide control over the totality of the College's resources and provide management with assurances that the resources are being properly applied for the achievement of the College's Strategic Plan and business objectives, these include:
- Financial viability
 - Achieving value for money
 - Fulfilling its responsibility for the provision of effective financial controls over the use of public funds
 - Ensuring that the College complies with all relevant legislation
 - Safeguarding the assets of the College
- 2.4. Compliance with these Financial Regulations is compulsory for all staff connected with the College. Any staff member who fails to comply with the financial regulations may be subject to disciplinary action under the College's Disciplinary policy. It is the responsibility of managers to ensure that staff are made aware of the existence and content of these Financial Regulations.
- 2.5. The Finance and General Purposes Committee is responsible for overseeing, reviewing, and approving the Financial Regulations, through the Director of Finance and Estates.
- 2.6. In exceptional circumstances, the Principal may authorise a departure from the detailed provision herein, such departure to be reported to the Finance and General Purposes Committee at its earliest opportunity.
- 2.7. Inverness College's detailed Financial Procedures set out how these regulations will be implemented and are contained in the Finance Manual.

CORPORATE GOVERNANCE

3 Responsibility of the Principal and Chief Executive

- 3.1. The College Principal is responsible for the detailed administration of the College and will function as the Chief Executive and the Board's Chief Educational advisor.
- 3.2. The Principal is responsible for satisfying that the Board of Management meets the requirements of the Financial Memorandum as a condition of receiving grant funding. In particular, UHI requires that the College complies with the principles of good governance set out in the Code of Good Governance for Scotland's Colleges, ensuring that:

- Public funds are used in accordance with relevant legislation, the requirements of the Financial Memorandum and only for the purpose(s) for which they were given. Strategic, capital, or other grant funding must only be used for the purpose for which the Regional Strategic Body provide it
 - Subject to any legal requirement to observe confidentiality, the College will be open and transparent with the Regional Strategic Body and other stakeholders, and will give, or be prepared to give, a public justification of its decisions in relation to the use of public funds
 - The College strives to achieve value-for-money and is economical, efficient and effective in its use of public funding
 - There is effective planning and delivery of the College's activities in accordance with its mission and its commitments to the Regional Outcome Agreement agreed with SFC
 - The College plans and manages its activities to remain sustainable and financially viable. An institution is being managed on a sustainable basis if, year on year, it generates sufficient income to cover its costs and allow for maintenance of and investment in its infrastructure (physical, human and intellectual) at a level which enables it to maintain adaptive capacity necessary to meet future demands
 - The College has a sound system of internal management and control, including an audit committee, an effective internal audit service, and adequate procedures to prevent fraud or bribery
 - The College has an effective policy of risk management and risk management arrangements
 - The College has regular, timely, accurate and adequate information to monitor performance and account for the use of public funds. Such information will be made available to the Regional Strategic Body on request, as necessary, for the exercise of its functions and to gain assurance
 - The College is engaged actively in continuously enhancing the quality of its activities and involves students and other stakeholders in these processes• The Regional Strategic Body Internal Audit Service has rights of access to all the College's premises, staff, records information, and assets which it considers necessary to fulfil its role and responsibilities. Access will be arranged by prior agreement where possible
 - As well as being accountable directly to the governing body of the College for the proper conduct of the College's affairs, the Chief Executive Officer of the College is also accountable directly to the Regional Strategic Body's Chief Officer for the College's proper use of funds deriving from the Regional Strategic Body and its compliance with the requirements of this FM.
- 3.3. The Principal and Chief Executive shall demonstrate his or her oversight of financial matters by signing the balance sheet within the annual financial statements.
- 3.4. The Principal and Chief Executive is directly responsible to the Board of Management for the control of resources, for seeking economy, efficiency and effectiveness in the use of the College's resources and for ensuring that financial considerations are taken into account at all stages of decision-making.
- 3.5. In particular, the Principal and Chief Executive shall:

- Sign the accounts and ensure satisfactory and adequate records are retained in a form acceptable for presentation to the Scottish Parliament.
- Advise the Board of Management on the proper discharge of its financial duties.
- Be authorised to write off losses, up to a level as specified in the Scheme of Delegation contained in the Articles of Governance, and to instruct special payments.
- Be involved with the SFC Chief Executive on matters relating to public funding which arise before the Public Accounts Committee / Scottish Parliament.
- Vire between budget heads, when necessary, within agreed overall budgets, taking account of and complying with these Regulations.

4 Responsibility of the Director of Finance and Estates

- 4.1. The Director of Finance and Estates is responsible to the Board of Management for providing appropriate financial context and information on the financial position of the College.
- 4.2. The Director of Finance and Estates is responsible for the day-to-day financial administration of the College and to the Principal and Chief Executive for:
- Preparing annual capital and revenue budgets and financial plans.
 - Preparing accounts, management information, monitoring and control of income and expenditure against budgets and all financial operations.
 - Preparing the College's annual accounts and other financial statements and accounts.
 - Ensuring that the College maintains satisfactory financial systems.
 - Provision of advice on financial policy and liaising with internal and external auditors to achieve efficient processes.
 - Ensuring that the College adheres to the specific delegated financial limits and annual reporting requirements set out in Appendix G.

5 Responsibility of Budget Holders

- 5.1. Every budget holder shall always ensure that they comply fully with the College's Financial Regulations and Financial Procedures, and endeavour to secure value for money on all expenditure budgets for which they are responsible. They are fully responsible for working within their budgetary limits.
- 5.2. Budget holders must provide the Director of Finance and Estates on request information to assist with:
- Financial planning
 - Compilation of College Financial statements
 - Implementation of audit, financial, project and value for money reviews and recommendations

6 Staff Responsibility

- 6.1. All staff members should be aware and have responsibility for the security of the College's property, for avoiding loss and for due economy in the use of resources. They should ensure that they are aware of the College's financial authority limits, and College procurement guidance (see Procurement Toolkit).
- 6.2. Staff shall make available any relevant information to the Finance Department in connection with the implementation of the College's Financial Procedures, these Financial Regulations, and the system of internal financial control.
- 6.3. Staff shall provide the Director of Finance and Estates with such financial and other information as he or she may deem necessary, from time to time, to carry out the requirements of the Board of Management.
- 6.4. All staff must immediately notify the Director of Finance and Estates whenever any matter arises which involves, or is thought to involve, irregularities concerning cash, property or matters owned by the College.

7 Risk Management

- 7.1. Risk is the threat that an action or event will adversely affect the College's ability to achieve its objectives. Risk management seeks to control the potential loss or damage to which the College is exposed.
- 7.2. The College acknowledges the risks inherent in its business and is committed to managing those risks that may cause a threat whether this is financially or objectively. Guidance on the level of risk considered to be acceptable and unacceptable by the College is set out in the Risk policy statement. Also contained within this policy are the requirements to have a Risk Register, Risk Mitigation Plan for the College, and a Business Contingency Plan. The College has a Business Continuity policy statement.
- 7.3. The Board of Management has overall responsibility for ensuring there are appropriate risk management arrangements.
- 7.4. The Audit Committee monitors risk on behalf of the Board of Management and reports annually to the Board of Management.

8 Public Interest Disclosure (Whistle-blowing)

- 8.1. The College has a Public Interest Disclosure Policy, which complies with the Public Interest Disclosure Act 1998.

9 Code of Conduct

- 9.1. The College is committed to the highest standards of openness, integrity and accountability. It seeks to conduct its affairs in a responsible manner, having regard to the principles established by the Committee on Standards in Public Life (formerly known as the Nolan Committee), which members of staff at all levels are expected to observe.
- 9.2. The College has a Code of Conduct for Board members and a Staff Code of Conduct.
- 9.3. The College holds registers of interests for the Board of Management and the Executive Management team, maintained by the College Secretary.

10 Receiving gifts or hospitality

- 10.1. It is an offence under the Prevention of Corruption Act 1906, the Bribery Act, and the Staff Code of Conduct to accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity. The guiding principles to be followed by all members of staff must be:
- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
 - The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation. Staff members should seek guidance from the Director of Finance [and Estates](#) when there is an offer of gifts or hospitality. For the protection of staff, the College Secretary will maintain a register of gifts and hospitality received where the value is in excess of £20.00. All relevant details should be passed on via the [Gifts and Hospitality Form](#).
 - Gifts or hospitality received must be reasonable and proportionate to the nature of the relationship and must be accepted for the primary purpose of better presenting the College or establishing cordial relationships with business partners.
 - At all times staff must follow guidelines as contained within the staff Code of Conduct.

11 Financial Planning

- 11.1. The Director of Finance [and Estates](#) is delegated responsibility by the Principal and Chief Executive for preparing annual financial plans for approval by the Board of Management, on recommendation from the Finance and General Purposes Committee, and for preparing financial forecasts for submission to the funding

body. Financial plans should be consistent with the strategic plans and Estates strategy approved by the Board of Management.

12 Resource Allocation

12.1. Resources are allocated annually by the College's Executive Management Team and recommended to the Board of Management through the Finance and General Purposes Committee, based on the above objectives. College managers are responsible for the economic, effective, and efficient use of resources allocated to them.

13 Budget Preparation

13.1. The Director of Finance [and Estates](#) is responsible for preparing an annual revenue budget and capital programme for consideration by the Finance and General Purposes Committee before submission to the Board of Management for approval.

13.2. The budget should include monthly cash flow forecasts for the year. The Director of Finance [and Estates](#) must ensure that detailed budgets are prepared in order to support the resource allocation process and that these are communicated to College managers following approval by the Board of Management.

13.3. Throughout the year, the Director of Finance [and Estates](#) is responsible for submitting revised budgets to the Finance and General Purposes Committee and the Board of Management.

14 Capital Expenditure Programme

14.1. The capital programme includes all expenditure on land, buildings, equipment, furniture and associated costs, whether or not they are funded from capital grants, to be capitalised for inclusion in the College's financial statements. The Finance and General Purposes Committee approve the College's capital programme.

14.2. The Director of Finance [and Estates](#) will establish procedures for the inclusion of capital projects in the capital programme for approval by the Finance and General Purposes Committee. These will set out the information that is required for each proposed project as well as the financial criteria that they are required to meet. These are shown at Appendix C.

14.3. The Director of Finance [and Estates](#) will also establish procedures for the approval of significant variations to approved projects, to the Principal and Chief Executive, the Finance and General Purposes Committee, and if appropriate, to the funding body.

14.4. The Director of Finance and Estates will provide regular statements concerning capital expenditure to the Finance and General Purposes Committee for monitoring purposes.

14.5. Following completion of any capital project, a final report should be submitted to the Finance and General Purposes Committees including actual expenditure against budget and reconciling funding arrangements where a variance has occurred as well as other issues affecting completion of the project. Where applicable, a post-project evaluation report may also need to be sent to the relevant funding body.

15 Overseas Activity

15.1. If planning and undertaking overseas activity, the College must have due regard to the relevant guidelines issued by the funding body.

16 Other Major Developments

16.1. Any new major aspect of business, or proposed establishment of a company or joint venture, which will require an investment in buildings, resources or staff time should be presented for approval to the Finance and General Purposes Committee. The information that is required for each proposed development as well as the financial criteria that they are required to meet are summarised at Appendix D.

17 Financial Control

17.1. The control of income and expenditure within an agreed budget is the responsibility of the designated Budget Holder, who must ensure that day-to-day monitoring is undertaken effectively. Budget Holders are responsible for managing their budgets such that income targets are achieved, and expenditure limits are not exceeded. Subject to the approval of the Executive Management Team, and conditional on other budgets being satisfactorily controlled, expenditure may include a proportion of additional income generated during the year.

17.2. Significant departures from agreed budgetary targets must be reported immediately to the Director of Finance and Estates by the Budget Holder concerned and, if necessary, corrective action taken.

17.2. The College's specific delegated financial limits are set out in Appendix I. The institution must obtain SFC's prior written approval, through the Regional Strategic Body, before entering into any undertaking to incur any expenditure that falls out with these delegations

17.3. The College's specific delegated financial limits are set out in Appendix 17.3. G. The institution must obtain SFC's prior written approval, through the Regional Strategic Body, before entering into any undertaking to incur any expenditure that falls out with these delegations.

Formatted: Font: 12 pt

Formatted: Left, Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, Space Before: 0 pt, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.92 cm

Formatted: List Paragraph, Justified, Right: 1.1 cm, Space Before: 0.05 pt, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 1.51 cm, Tab stops: 1.78 cm, Left + 2.92 cm, Left

Formatted: Font: 12 pt

17.4. Prior SFC approval, through the Regional Strategic Body, must always be obtained before incurring expenditure for any purpose that is, or might be considered, novel, contentious or repercussive or which has or could have

significant future cost implications. Novel is interpreted as involving proposed expenditure or financial arrangements of a sort not undertaken previously or which is not standard practice. Contentious would include proposed expenditure or financial arrangements where there was any doubt as to its regularity e.g., its compliance with relevant legislation or guidance – or its propriety – e.g. compliance with the standards expected of publicly funded bodies or their officials. Proposed expenditure or financial arrangements that might be considered to be sensitive would also be regarded as contentious.

18 Financial Information

18.1. Budget Holders are assisted in their duties by management information provided under arrangements approved by the Director of Finance and Estates. The types of management information available to the various levels of management are described in the detailed Financial Procedures, together with the timing at which they can be expected.

18.2. The Director of Finance and Estates is responsible for supplying budgetary reports on all aspects of the College's finances to the Finance and General Purposes Committee. The report shall outline the income and expenditure of the College for the financial year to date and be presented to the Board of Management.

19 Changes to the Approved Budget

19.1. Changes proposed to the approved College budget must be considered by the Finance and General Purposes Committee and if required the Board of Management.

20 Virement

20.1. Where a budget manager is responsible for more than one budget, virement is permitted of up to £3,000 of the budget to which virement is sought, with the approval of the Director of Finance and Estates.

ACCOUNTING ARRANGEMENTS

21 Financial Year

21.1. Inverness College's financial year will run from 1 August until 31 July the following year.

22 Basis of Accounting

22.1. The consolidated financial statements are prepared on the historical cost basis of accounting and in accordance with applicable accounting standards and the funding body's direction.

23 Format of the Financial Statements

23.1. The financial statements are prepared in accordance with the Statement of Recommended Practice Accounting for Further and Higher Education, the Accounts Direction issued by the Scottish Funding Council; the Financial Memorandum, the Scottish Public Finance Manual (SPFM) and the Financial Reporting Manual (FReM) where applicable.

24 Annual Reporting Requirements

24.1. The college is required to report annually to SFC, through the Regional Strategic Body, on the levels of its expenditure for certain categories of expenditure above specified levels detailed in the Financial Memorandum. A summary of these requirements is detailed in Appendix G.

25 The Public Services Reform (Scotland) Act 2010

25.1. After the end of the financial year, the college must publish a statement of any expenditure incurred during that financial year in connection with:

- Public Relations
- Overseas Travel
- Hospitality and entertainment
- External consultancy

25.2. A statement must be produced giving specific details of any transactions relating to any of the matters listed above made during the financial year in excess of £25,000.

26 Capitalisation and Depreciation

26.1. New land and buildings will be recorded in the balance sheet at actual build or acquisition cost, except where they are received as gifts, where they will be recorded at depreciated replacement value. Buildings will be depreciated in equal instalments over their estimated remaining useful life. Land will not be depreciated.

26.2. Expenditure incurred on repairs, refurbishment or extension of existing

buildings will be capitalised where it can be demonstrated that the work represents an improvement to the original specification of the building, and the resultant building value would be greater than the current book value.

~~26.2.~~

26.3. Expenditure incurred on the acquisition of assets other than land and buildings will be recorded in the balance sheet where the acquisition cost is £5,000 or more. Grouped items (e.g., a suite of computers) with a collective total value of £5,000 or more may also be capitalised. Capitalised assets other than land and buildings will be depreciated in line with the College's accounting policies.

26.4. Where capital assets are funded by SFC or other government grant, a capital grant balance will be established and will be released to income over the useful life of the asset.

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Normal, No bullets or numbering

27 Accounting Records

27.1. The Director of Finance and Estates is responsible for the retention of financial documents. Retained records should be kept in a form that is acceptable to the relevant authorities and complies with the Freedom of Information (Scotland) Act 2002, the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) 2018.

27.2. The College is required by law to retain prime documents for six years (or as detailed within specific funding requirements). These include: official purchase orders, paid invoices, invoices raised, bank statements, receipts and payroll records (including expense claims).

27.3. The Director of Finance and Estates will make appropriate arrangements for the retention of electronic records.

27.4. Staff should ensure that retention arrangements comply with any specific requirements of funding organisations. Additionally, for auditing and other purposes, other financial documents should be retained for three years or as determined by the funder.

28 Public Access

28.1. The Board of Management is required to supply any person with a copy of the College's most recent approved financial statements within twenty days of a request. The College will allow members of the public to inspect the statement of accounts during normal working hours. Published accounts will also be posted on the College website. Note that financial statements are only fully approved once they have been laid before Parliament and no publication can take place before this.

~~28.1.~~

Formatted: Font: 12 pt

Formatted: Normal, No bullets or numbering

29 Taxation

29.1. The Director of Finance and Estates is responsible for advising managers, in the light of guidance issued by the appropriate bodies and relevant legislation as it applies, on all taxation issues relating to the College.

29.2. The Director of Finance and Estates shall ensure compliance with statutory requirements including those concerning VAT, PAYE, national insurance, corporation tax and import duty. This will include provision for maintaining the College's tax records, making all tax payments, receiving tax credits and submitting tax returns by their due date as appropriate.

AUDIT REQUIREMENTS

30 General

30.1. External auditors and internal audit staff shall have authority to:

- Access College premises at reasonable times.
- Access all assets, records, documents and correspondence relating to any financial and other transactions of the College.
- Require and receive such explanations as are necessary concerning any matter under examination.
- Require any employee of the College to account for cash, stores or any other College property under his or her control.
- Access records belonging to third parties, such as contractors, when required.

30.2. The Director of Finance and Estates is responsible for drawing up a timetable for final accounts purposes and will advise staff and the external auditors accordingly.

30.3. The financial statements will be considered by the Finance and General Purposes Committee, and reviewed by the Audit Committee. On the recommendation of these Committees, they will be submitted to the Board of Management for approval, and to the funding body, who will present them to the Scottish Parliament via the external auditors. The financial statements shall be signed by the Principal and Chief Executive and Chairman of the Board of Management.

31 External Audit

31.1. Under the terms of the Public Finance and Accountability (Scotland) Act 2000, the Auditor General is responsible for the appointment of the external auditors for the College.

31.2. The primary role of external audit is to report on the College's financial statements and to conduct such examination of the statements and underlying records and control systems as are necessary to reach their opinion on the statements and to report on the appropriate use of funds. Their duties will be in accordance with advice from Audit Scotland.

~~31.2.~~

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm,
Right: 0 cm, Space Before: 0 pt, No bullets or
numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Normal, No bullets or numbering

32 Fraud and Corruption

32.1. It is the duty of all members of staff, management, and the Board Members to notify the Director of Finance and Estates immediately whenever any matter arises which involves, or is thought to involve, irregularity, including fraud, corruption or any other impropriety. Please also refer to the Bribery Act (2011). The Director of Finance and Estates shall immediately advise the Principal and Chief Executive who will consider the course of action to take. Any frauds that are detected must be reported to SFC, through the Regional Strategic Body, as and when they occur. If the suspected fraud is thought to involve the Director of Finance and Estates and/or the Principal, the member of staff shall notify the College Secretary; who in turn will contact the Chair of the Audit Committee directly about the irregularities.

33 Value for Money

33.1. It is a requirement of the financial memorandum that the Board of Management of the College is responsible for delivering value for money from public funds. It should keep under review its arrangements for managing all the resources under its control, considering guidance on good practice issued from time to time by the funding body, Audit Scotland, the Public Accounts Committee or other relevant bodies. The College has a Value for Money Policy.

33.2. To fulfil this responsibility, the Board of Management will annually review spending for evidence of value for money received and will provide evidence of compliance with the funding body's requirements. It will be used to enable the Audit Committee to refer to value for money in its annual report.

34 Other Auditors

The College may, from time to time, be subject to audit or investigation by external bodies such as the funding body, Audit Scotland, European Court of Auditors, HM Revenue and Customs. They have the same rights of access as external and internal auditors.

TREASURY MANAGEMENT

35 Treasury Management

35.1. The College has a Treasury Management procedure (contained in the Financial Procedures) setting out the College position on cash management, investments, and borrowings. This must comply with the SFC rules regarding approval for any borrowing.

35.2. All executive decisions concerning borrowing, investment, or financing (within policy parameters) shall be delegated to the Principal and Chief Executive or the Director of Finance and Estates who will prepare an appropriate reporting system. All borrowing shall be undertaken in the name of the College and shall conform to any relevant funding body approval and requirements. Any investments of a speculative nature must not be made without the prior written approval of SFC, through the Regional Strategic Body.

35.3. The Director of Finance and Estates will report to the Finance and General Purposes Committee on the activities of the treasury operation and on the exercise of treasury powers delegated to him/ her.

36 Appointment of Bankers and Other Professional Advisors

36.1. The Finance and General Purposes Committee is responsible for the appointment of the College's bankers and other professional financial advisers (such as investment managers). The appointment shall be subject to regular review, the results of which will be reported to the Finance and General Purposes Committee. Colleges are required to subscribe to the Government Banking Service contract from financial year 2017-18.

37 Banking Arrangements

37.1. The College Director of Finance and Estates is responsible, on behalf of the Finance and General Purposes Committee, for liaising with the College's bankers in relation to the College's bank accounts. All payments shall be ordered on the authority of the Director of Finance and Estates, who shall make proper arrangements for their safe custody.

37.2. Colleges are required to subscribe to the Government Banking Services (GBS) contract from financial year 17-18 onwards.

37.3. Only the Director of Finance and Estates or nominated deputy may open or close a bank account for dealing with the College's funds. All bank accounts shall be in the name of the College or one of its subsidiary companies.

~~37.4.~~ With the exception of inter-account transfers under £100,000, electronic banking payments must have separation between payment initiation and authorisation. One electronic authorisation is required, and payments should then be countersigned by either the Finance Manager or the Director of Finance and Estates.

~~37.4.~~

37.5. BACs payment runs to suppliers are countersigned by the Director of Finance and Estates after transmission. The exception to this is payroll

Formatted: Right: 0.92 cm, Space Before: 4.65 pt, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 1.51 cm, Tab stops: 1.78 cm, Left + 2.93 cm, Left

where this is carried out prior to transmission. For details on transmission limits please see the Finance Manual.

~~37.6.~~ The Director of Finance and Estates is responsible for ensuring that all bank accounts are subject to regular reconciliation and that large or unusual items are investigated as appropriate.

~~37.6.~~

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, Space Before: 0 pt, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

INCOME

38 General

38.1. The Director of Finance and Estates is responsible for ensuring that the College receives all income to which it is entitled. All receipt forms, invoices or other official documents in use and electronic collection systems must have the prior approval of the Director of Finance and Estates. Levels of charges for all College services provided, including contract research, services rendered, goods supplied, and rents and lettings will be reviewed regularly and agreed by the Finance and General Purposes Committee at least annually. The Director of Finance and Estates is responsible for the prompt collection, security and banking of all income received.

38.2. The Director of Finance and Estates is responsible for ensuring that all grants notified by the funding body and other bodies are received and appropriately recorded in the College's accounts.

38.3. The Director of Finance and Estates is responsible for ensuring that all claims for funds, including research grants and contracts, are made by the due date.

39 Maximisation of Income

39.1. It is the responsibility of all staff to ensure that revenue to the College is maximised, and for the identification, collection, and banking of income.

40 Receipt of Cash, Cheques and Other Negotiable Instruments

40.1. All monies received within departments from whatever source must be recorded by the department on a daily basis together with the form in which they were received, for example cash, cheques and other negotiable instruments. Receipts must be given where money is delivered in person or where specifically requested, using official receipt stationery.

40.2. All monies received must be banked or paid to the cashier promptly, and in accordance with a timetable prescribed by the Director of Finance and Estates and set out in the Financial Procedures. The custody and transit of all monies received must comply with the requirements of the College's insurers.

40.3. All sums received must be paid in and accounted for in full and must not be used to meet miscellaneous expenses or be paid into the cash float.

41 Collection of Debts

41.1. The Director of Finance and Estates is responsible for ensuring that:

- Debtors invoices are raised promptly on official invoices in respect of all income due to the College.
- Invoices are prepared with care, recorded in the ledger, show the correct amount due and are credited to the appropriate income account.
- Any credits granted are valid, properly authorised and completely recorded.
- VAT is correctly charged where appropriate and accounted for.
- Monies received are posted to the correct debtors account promptly.
- Swift and effective action is taken in collecting overdue debts, in accordance with the protocols noted in the financial procedures.
- Outstanding debts are monitored and reports prepared for management.

41.2. Only the Principal and Chief Executive or Director of Finance and Estates can implement non-standard credit arrangements outside those approved by the Finance and General Purposes Committee. Any subsequent changes to standard credit terms must be submitted to Finance and General Purposes Committee for approval.

41.3. Recovery of debts outside the standard terms of payment may include the right to charge interest on late payments under the terms of the Late Payment of Debts (Interest) Act 1998.

41.4. Requests to write off debts must be approved in accordance with the Financial Procedures. All debts written off must be in accordance with the College Scheme of Delegation (contained in the Governance Manual) and reported to the Finance and General Purposes Committee. Any write-offs greater than £3,000 must be reported to the SFC, through the Regional Strategic Body, on an annual basis (see Appendix G).

42 Student Fees

42.1. The Director of Finance and Estates is responsible for ensuring that all student fees due to the College are received. HE Fees are set by UHI and Inverness College adheres to the UHI Fees Policy. The Finance and General Purposes Committee must agree increases in FE student fees.

42.2. Any student who has not paid an account for fees or any other item owing to the College will not be permitted to complete their course until all outstanding debts have been cleared. Such students shall be prevented from re-enrolling at the College and from using any of the College's facilities unless appropriate arrangements have been made and approval has been given by the Principal.

43 Discretionary Fund and Childcare Payments

43.1. The College will comply with the Scottish Funding Council scheme for discretionary fund payments. Under no circumstances should payments be made other than in accordance with this approved scheme.

43.2. The Director of Finance and Estates is responsible for ensuring the adequacy of the systems in place for:

- Approving funding awards in accordance with the scheme.
- Paying awards that have been approved.
- Recovering repayable loans that have been paid.

Formatted: Not Expanded by / Condensed by

Formatted: Font: 12 pt

Formatted: Normal, No bullets or numbering

GRANTS AND CONTRACTS

44 General

44.1. Where approaches are to be made to outside bodies for support for research projects or where contracts are to be undertaken on behalf of such bodies, it is the responsibility of the Budget Holder to ensure that the financial implications have been appraised by the Director of Finance and Estates or a nominee. This will include obtaining a set of grant terms and conditions from each organisation providing funding to enable appropriate monitoring of compliance.

44.2. The Director of Finance and Estates is responsible for ensuring that there is adequate provision of resources to meet all commitments. The Director of Finance and Estates should ensure that the full cost of the project or contract is established. The agreement must be in line with the Colleges Financial Procedures with regard to indirect costs and other expenses and taking account of different procedures for the pricing of projects depending on the nature of the funding body.

44.3. Grants and contracts must be submitted in the name of the College and authorised prior to submission. Only the Director of Finance and Estates or the Principal and Chief Executive may authorise applications on behalf of the College.

44.4. The Director of Finance and Estates shall ensure that all financial records relating to grants and contracts are maintained in the approved manner and that all claims for reimbursement are initiated by the due date.

44.5. Each grant or contract will have a named contact and will be assigned to a specific budget holder.

44.6. The budget holder will control pay and non-pay expenditure. The budget holder may delegate day-to-day control to a designated person, but any overspend or under-recovery of overheads is the responsibility of the budget

holder with any loss being a charge on departmental funds.

45 Grant and Contract Conditions

45.1 Many grant-awarding bodies and contracting organisations stipulate conditions under which their funding is given. In addition, there are often procedures to be followed regarding the submission of interim or final reports or the provision of other relevant information. Failure to respond to these conditions may result in the College suffering a significant financial penalty. It is the responsibility of the named supervisor or grant holder to ensure that conditions of funding are met. Any loss to the College resulting from a failure to meet conditions of funding is the responsibility of the budget holder and will be charged against departmental funds.

45.1

Formatted: Normal, No bullets or numbering

OTHER INCOME GENERATING ACTIVITY

46 Private Consultancies and Other Paid Work

46.1. Unless otherwise stated in a staff member's contract, outside consultancies or other paid work may not be accepted without the consent of a member of the Executive Management Team (and in the case of a member of the Executive Management Team, the Principal).

46.2. Applications for permission to undertake work must be submitted for the appropriate authorisation and then be sent to the Director of Finance and Estates and will include the following information:

- The name of the member(s) of staff concerned.
- The title of the project and a brief description of the work involved.
- The proposed start date and duration of the work involved.
- Full details of any College resources required (for the calculation of the full economic cost).
- An undertaking that work will not interfere with the teaching and/ or normal College duties of the member(s) of staff concerned.
- Any intellectual property implications (due regard to section 55 of these Regulations).

47 Non Grant Funded Income

47.1. This relates to any commercial or non grant funded income including

innovation funding and knowledge transfer partnerships.

47.2. Any commercial or non grant funded activity, with the exception of Research ~~and the Early Learning and Childcare centre~~ will be managed by the Vice Principal – Curriculum, Operations, and External Relations areas of responsibility. ~~Business Development Directorate.~~

47.3. All activity managed by the Vice Principal – Curriculum, Operations, and External Relations. ~~Business Development Directorate~~ will be subject to the College's Directorate's agreed processes for those areas. All activities will be costed in accordance with resourcing rates agreed with the Finance Manager which will be reviewed on an annual basis. The Vice Principal – Curriculum, Operations, and External Relations or the Operations and Commercial Manager. Director of External Relations will sign off all costings with a view to market rates and sustainability.

Formatted: Not Highlight

47.4. No income generating activities referred to in this section are to be undertaken without the approval of the Vice Principal – Curriculum, Operations, and External Relations or the Operations and Commercial Manager. Director of External Relations

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, Space Before: 0 pt, No bullets or numbering, Tab stops: Not at 1.65 cm + 2.93 cm

47.4.

Formatted: Font: 12 pt

Formatted: Normal, No bullets or numbering

48 Profitability and Recovery of Overhead Costs

48.1.4 All other income-generating activities must be self-financing or surplus generating unless it is intended that a new course is to be launched as a loss leader. If that is the case, the reason for it must be specified and agreed by the Vice Principal – Curriculum, Operations and External Relations or the Commercial Manager. ~~Director of Finance.~~

48.2. All curriculum provision must contribute to overhead costs. The annual curriculum plan review (CPR) process shall identify courses that do not meet this requirement which must be agreed by EMT during the final stage of the CPR process to approve the curriculum plan. The curriculum plan for the next academic year shall be approved by EMT by the end of the preceding calendar year.

48.3. Proposals for new curriculum courses must be fully costed and agreed using the appropriate further education or higher education costing models prior to submission to the Programme Approval Panel. New curriculum courses approved by the Programme Approval Panel shall be included in the curriculum plan for review IAW with the requirements and process outlined in paragraph 48.2. New

curriculum proposals submitted to the Programme Approval Panel after the curriculum plan review is complete shall only be included in the curriculum plan for the next academic year if resource and funding requirements permit. This is subject to approval by the curriculum review panel (Tertiary Education Leaders/Information Systems Manager/Operations and Commercial Manager).

49 External business and management consultancy contracts

Formatted: Not Expanded by / Condensed by

49.1. In accordance with the Financial Memorandum, any proposal to award a contract over £25,000 without competition must be approved in advance by the Scottish Funding Council.

49.2. Any external consultancy contracts with a value of more than £100,000 (over a 4 year period) must be approved in advance by the Scottish Funding Council.

Formatted: Indent: Left: 0 cm, First line: 0 cm

Formatted: Not Highlight

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 1.51 cm

Formatted: Indent: Left: 0.39 cm, Hanging: 1 cm, No bullets or numbering

49

49.1. Any external consultancy contracts with a value of more than £100,000 must be approved in advance by the SFC, through the Regional Strategic Body.

In accordance with the Financial Memorandum, any proposal to award a contract over

£25,000 without competition must be approved in advance by the Scottish Funding Council.

Any external consultancy contracts with a value of £100,000 (over a 4 year period) must be approved in advance by the Scottish Funding Council.

Formatted: Body Text, Indent: Left: 0.89 cm, Hanging: 0.76 cm, Right: 1.05 cm, Space After: 0 pt, Line spacing: single, Tab stops: 2.93 cm, Left

50 Deficits

50.1. Any unplanned deficits incurred on other income-generating activities will be charged to departmental funds.

51 Retention of income

51.1. The college can retain all commercial income, bequests or donations received. These funds will be in addition to any grant or funding the college receives from the Regional Strategic Body or SFC. There can be no carry forward of any funds.

Formatted: Font: 12 pt

Formatted: Normal, No bullets or numbering

51.1.

51.2. Donation of surplus funds to arms-length foundations

The College may donate any surplus on its income and expenditure account as at 31 March each year to an arms-length foundation (ALF), subject to approval from the Finance and General Purposes Committee. The donation must take place in the financial year in which it arises and is subject to sufficient cash and resource cover being available. For the purposes of donations to an arms-length

foundation, the financial year is the Scottish Government financial year, which is April to March.

52 Additional Contributions to Departments

52.1. Distribution of profits on other income-generating activity between central funds of the College and individual departments will be in accordance with the Financial Procedures.

INTELLECTUAL PROPERTY RIGHTS AND PATENTS

53 General

53.1. Certain activities undertaken within Inverness College including research and consultancy may involve the creation of works, designs, databases and inventions, which may give rise to copyright, design rights, patents and other proprietary rights, some of which may be patentable or registrable. These are collectively known as intellectual property.

54 Patents

54.1. The Principal is responsible for establishing a policy as required to deal with any patents or other intellectual property rights accruing to Inverness College from inventions and discoveries, works, designs and databases made by staff in the course of their work.

55 Intellectual Property Rights

55.1. In the event of the College deciding to become involved in the commercial exploitation of inventions and research or other intellectual property rights, the matter should then proceed in accordance with Intellectual Property policy. These would be developed as required following legal advice and be approved by the Finance and General Purposes Committee. The College will adopt the UHI Intellectual Property Policy where applicable.

EXPENDITURE

56 General

- 56.1. The Director of Finance and Estates is responsible for making payments to suppliers of goods and services to the College.

57 Delegation to Budget Holders

57.1. The budget holder is responsible for purchases within their department. Budget holders are required to observe the College's Financial Procedures and adhere to guidelines in the Procurement Toolkit. Purchasing authority may be delegated to named individuals within the department.

~~57.2.~~ The Director of Finance and Estates shall maintain a register of authorised signatories and budget holders must supply them with specimen signatures of those authorised to commit the College to goods or services or to certify documents for payment.

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Normal, No bullets or numbering

57.3. Central control by the Director of Finance and Estates shall be exercised over the creation of requisitioners and authorisers and their respective financial limits within any electronic requisitioning system.

57.4. The Director of Finance and Estates must be notified immediately of any changes to the authorities to commit expenditure.

57.5. Budget holders are not authorised to commit the College to expenditure without first ensuring that sufficient funds are available in an approved budget to meet the cost.

58 Procurement

58.1. Inverness College UHI requires all budget holders, irrespective of the source of funds, to procure supplies, equipment and services at the lowest all goods and services on a most economically advantageous basis. All Procurement activity will be conducted in a manner that delivers best value - possible cost consistent through considering cost, with quality, and sustainability. delivery requirements and sustainability, and in accordance with sound business practice.

58.2. As a contracting Authority Inverness College UHI must comply with the Public Procurement (Scotland) Regulations 2016. From 1st January 2021 the World Trade Organisation Government Procurement Agreement will apply to regulated contracts exceeding the threshold.

Formatted: Superscript

Inverness College UHI operates a devolved procurement policy where by low value goods and services under procurement route 1 and 2 (Routes 1 & 2) are delegated to the respective stakeholders/ budget holders, to carry out the procurement exercise. Any high value All regulated procurement activity (Routes 3 & 4) must be is to be carried out by the College Procurement team.

in line with the 4 years spend analysis and also Scottish Government Regulations covering regulated procurement tender exercises. Any procurement activity which may present exposure risk to the College

Formatted: Indent: Left: 1.66 cm, Space Before: 0.5 pt, No bullets or numbering

~~regardless of value should be referred to the College Procurement team. For example, this could include activity where potential conflict of interests may arise.~~

58.32. The Director of Finance and Estates is responsible for:

- ~~• Ensuring that the College complies with its legal obligations concerning EU/UK and National procurement legislation as appropriate.~~
- ~~• Ensuring that procurement is undertaken by appropriately trained staff,~~

~~Ensuring that the College complies with its legal obligations concerning EU/UK and National procurement legislation as appropriate.~~

- ~~• Ensuring that procurement is undertaken by appropriately trained and authorised staff, and treated as a key component of achieving the institution's objectives consistent with the principles of Best Value, the highest professional standards and any legal requirement.~~
- ~~• Ensuring that all procurement activity is in compliance with:~~

Formatted: List Paragraph, Right: 1.15 cm, Outline numbered + Level: 3 + Numbering Style: Bullet + Aligned at: 1.02 cm + Indent at: 1.66 cm, Tab stops: 1.66 cm, Left

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: List Paragraph, Outline numbered + Level: 3 + Numbering Style: Bullet + Aligned at: 1.02 cm + Indent at: 1.66 cm

Formatted: Font: 11.5 pt

Formatted: List Paragraph, Space Before: 0 pt, Bulleted + Level: 1 + Aligned at: 2.41 cm + Indent at: 3.04 cm

Formatted: Font: 12 pt, Font color: Black

Formatted: Indent: Left: 1.76 cm, Hanging: 0.02 cm, Right: 0 cm, Space After: 0 pt, Line spacing: single, No bullets or numbering, No widow/orphan control, Don't adjust space between Latin and Asian text, Don't adjust space between Asian text and numbers

Formatted: Normal, Indent: Left: 1.02 cm, No bullets or numbering

- The Procurement Reform (Scotland) Act 2014
- The Public Contracts (Scotland) Regulations 2015
- The Procurement (Scotland) Regulations 2016
- EU Procurement Directives 2014
- Modern Slavery Act 2015
- Criminal Finances Act 2017
- Data Protection Act 1998,
- General Data Protection Regulation (EU 2016/679) (GDPR)
- Fair Work Practices
- Local Governance (Inverness College Financial Regulations)
- The drafting and negotiation of all Tender notices undertaken by Inverness College, in collaboration with the budget holder and on legal advice, where required, ensuring that Inverness College complies with relevant regulations on public purchasing policy.

- Ensuring that Inverness College's Procurement arrangements are known and observed by all involved in purchasing for Inverness College which is detailed in Appendix F Procurement Thresholds.
- Advising on matters of College purchasing and practice
- Advising and assisting staff where required on specific departmental purchases.
- ~~ensuring that the College's purchasing policy is known and observed by all involved in purchasing for the College.~~
- Developing appropriate standing supply arrangements on behalf of Inverness College to assist budget holders in meeting their value for money obligations.
- Ensuring all orders are authorised before they leave Inverness College, ~~no verbal or email instructions to proceed are to be issued to suppliers.~~
- ~~By exception, ensuring that any accepted conditions of contract for the purchase of goods do not expose the College to unacceptable risk. The Inverness College Terms and Conditions are to be used unless agreed in advance by the Director of Finance. Agreeing any amendments to Goods and Services Terms and Conditions.~~

~~58.5. Hospitality procurement will adhere to procurement guidelines wherever practical bearing in mind the requirement for fresh local produce.~~

5959. Tender Management (Tenders and Quotations)

~~Check these values — should this now be updated for values in Draft Procurement Step by Step 2021 and Draft Procurement Strategy 2023-2025-AM23~~

~~59.4. Budget Holders and delegated budget holders must comply with the Internal Governance Rules below:~~

~~59.5. Financial Procedures. The procurement thresholds are as follows: The World Trade Government Procurement Agreement and EU Procurement Directive 2014 Thresholds are amended every two years. The figures below are based on the latest figures (1ST January 2022).~~

~~All figures are exclusive of VAT.
59.1.~~

Formatted: Font: 12 pt

Formatted: Font: Symbol

Formatted: Normal, No bullets or numbering

Formatted: Font: 12 pt

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Font: Symbol, 12 pt

Formatted: Normal, No bullets or numbering

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Indent: Left: 1.25 cm, No bullets or numbering

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Superscript

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, Space After: 0 pt, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Indent: Left: 1.78 cm, No bullets or numbering

Route 1 < £3000	Devolved Procurement Route	4 years spend to be checked and verified. Local / National Framework Agreements to be checked Tendering Requirement
<£500 <£5000	By All Staff	Must use a National Framework agreement or Local Contract if suitable. If not, 1 quote must be obtained that aligns to the college or catalogue/internet print is required that meets with the Inverness College Value for Money Policy must be obtained, and approved by Budget Holder No Single Source Form required
>£500 <£1000	By Technicians / Delegates	2 quotes or catalogue/internet print is required that meets with the Inverness College Value for Money Policy and approved by Budget Holder Single source supply may be permitted on an exceptional basis only, and only where it is supported and evidenced

Formatted Table

Commented [AM1]: I have suggested £5000 as this is over a 4 year period but you may wish to change this figure to lower. I would not recommend any higher.

Formatted: Line spacing: single

		with a clear, valid rationale approved by both the College Procurement team and the Budget Holder.
>£1000 < £3000	By Budget Holder or Delegate	Evidence of market research is to be provided—includes catalogue, internet print outs and 2 formal written quotes are required that meets with the Inverness College Value for Money Policy. Single source supply may be permitted on an exceptional basis only, and only where it is supported and evidenced with a clear, valid rationale approved by both the College Procurement team and the Budget Holder.
Route 2 >£3,000 & <£9,999	Devolved Procurement Route	4 year spend to be checked and verified. Local / National Framework Agreements to be checked Tendering Requirement
>£5,000 - <£49,999	By Budget Holder or Delegate All staff	Must use a National Framework agreement or Local Contract to procure goods, if suitable. If not, 3 formal written quotes must be obtained that align to the <u>are required that meets with the IC College Value for Money Policy.</u> Contracts > £25,000 should be supported with a contract strategy agreed by and published on PCS Quick Quote facility. Single source supply may be permitted on an exceptional basis only, and only where it is supported and evidenced with a clear, valid rationale approved by the College Procurement team, the Budget Holder and the Director of Finance.
Route 3 >£10,000 & <£49,999	Regulated Procurement Route	4 year spend to be checked and verified. Local / National Framework Agreements to be checked Tendering Requirement
>Goods and Services >£50,000 - < £177,887 Works > £2m	By College Procurement Team	Must use a National Framework agreement or Local Contract to procure goods. If no agreement suitable, Competitive tendering <u>exercise published</u> on PCS. European funded projects must also be published on OJEU. Contract Award Notice to be published on PCS, using Quick Quote
Route 4A > £50,000 & Below OJEU	Regulated Procurement Route	Tendering Requirement 4 year spend to be checked and verified. Local / National Framework Agreements to

Formatted Table

Formatted Table

Formatted: Right: 0.17 cm, Line spacing: single

		be-checked
Goods & Services >(£177, 897) Works > £4,447,447B elow OJEU Threshold	By APUC / College Procurement Team	Must use a National Framework agreement or Local Contract to procure goods. If no agreement available, Competitive tendering exercise must be published on Find a Tender portal or OJEU for European funded projects. Contract Award Notice to be published. Competitive quotes on PCS Tender
Route 4B OJEU Compliance	Regulated Procurement Route	4-year spend to be checked and verified for PCS-T & OJEU compliance. Local / National Framework Agreements to be checked
Supply, Services and Design Contracts >£181,302 (as at 1 January 2018)	By APUC / College Procurement Team	To be in compliance with the Scottish Government Procurement Regulations for the Public Sector and also the Procurement Reform (Scotland) Act 2014 Public Contracts (Scotland) Regulations 2015, Procurement (Scotland) Regulations 2016 and the statutory guidance.

<p>Works Contracts >£4,551,413 (as at 1 January 2018)</p>	<p>By APUC / College Procurement Team</p>	<p>To be in compliance with the Scottish Government Procurement Regulations for the Public Sector and also the Procurement Reform (Scotland) Act 2014 Public Contracts (Scotland) Regulations 2015, Procurement (Scotland) Regulations 2016 and the statutory guidance.</p>
---	---	---

Notes:

~~These thresholds will apply to all Enquiries or Contracts processed locally or through the Public Contracts Scotland Portal (PCS) and all purchase orders processed regardless of the system used e.g. PECOS, SUN, Credit Card transactions.~~

~~The use of any relevant Local and National Framework Agreements are also to be considered.~~

~~As per government regulations, the 4 year cumulative spend has to be reviewed to ensure it does not exceed £50K within a 4 year window – (4 x £12.5K) unless a National Framework Agreement exists.~~

~~It is important that the total lifecycle costing and impact mapping is considered.~~

~~Working towards cost savings and cost avoidance is paramount with greater focus towards improved efficiencies, contract management and budget/cost management will be monitored.~~

~~59.2-59.6. Requisitions must not be split into smaller order quantities in order to avoid the correct procurement route.~~

~~59.3. When considering the correct procurement amount to apply the contract value, where spend is recurring, this should be calculated over a 4-year period. This has to take into account the whole commodity range and the expenditure across the College (excluding VAT).~~

~~59.7.~~

~~59.4. Exceptions to using Procurement Routes 1, 2, 3 and 4 is where by there is a suitable National Framework Agreement in place or where there is clear, valid evidence and justification for using only one supplier.~~

~~59.5. Suppliers/contractors must be made aware of Inverness College's Terms and Conditions and these must be accepted in full. If there are deviations from these, this must be highlighted and reviewed by the College Procurement Team.~~

~~59.6. For further information on these subjects, please see the Finance Manual and if further advice is required please contact the College Procurement Team.~~

~~59.8. For regulated contracts (Route 3 & 4) that are exempt or zero rated VAT the contract value threshold for goods and services will increase from £177,778 to £213,000.~~

~~59.9. Any conflicts of interest relating to a contractor must be declared. All~~

Formatted: Font: Not Bold, No underline

Formatted: Font: Not Bold

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: List Paragraph, Right: 0.9 cm, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm, Tab stops: 1.78 cm, Left + 2.93 cm, Left

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Font: 12 pt

Formatted: Right: 0 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

evaluators on regulated exercises must complete a Conflict of Interests Form prior to evaluating a tender submission.

59.10. As a living wage employer, the College is committed to considering fair work practices within our supply chain and must consider this within technical evaluation criteria, where appropriate.

59.11. The College is required to include a Community Benefits clause where the contract value is more than £4m.

59.12. Where a contract is exempt from competitive tendering, a Non Competitive Action Form must be completed and authorised.

60.0. Contracts

60.1-60.4. The College Procurement Team who will also be involved in the evaluation of bids and formal contracts award must only undertake the issue and receipt of tenders.

60.5. The achievement of value for money will be an objective in the letting of all contracts. No contract will be awarded for a period beyond which a budget has been approved unless specifically approved in writing by the Director of Finance and Estates.

60.6. Suppliers/contractors must be made aware of Inverness College's Terms and Conditions, and these must be accepted in full. If there are deviations from these, this must be agreed by the Director of Finance and Estates. Finance Director.

60.7. All regulated contracts must be detailed in a published Contracts Register.

60.2-60.8. All strategic level contracts should have formal contract management reviews.

61. Purchase Orders

The following delegated levels of authority for approvals are applicable when raising a purchase order.

Position	Financial Authority Level GBP £ Ex-VAT
Board of Management	>£250,000
Director of	>£75,000

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

Formatted: Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

Formatted

Commented [AM2]: I would suggest this could be

Formatted

Formatted: Not Expanded by / Condensed by

Formatted: Font: 12 pt

Formatted

Formatted

Formatted: Not Expanded by / Condensed by

Formatted: Font: 12 pt

Formatted

Formatted: Not Expanded by / Condensed by

Formatted

Formatted: Font: 12 pt

Formatted

Formatted

Formatted: Not Expanded by / Condensed by

Formatted

Formatted: Not Expanded by / Condensed by

Formatted

Formatted Table

Commented [AM3]: I would suggest adding this

<u>Finance and Estates</u>	
<u>Finance Manager</u>	<u>£5,000 (Budget Holder)</u>
<u>Principal & Chief Executive</u>	<u>>£75,000</u>
<u>EMT</u>	<u>£5,001 < £75,000</u>
<u>Tertiary Leader</u>	<u>£5,000 (Budget Holder)</u>
<u>Head of School</u>	<u>£5,000 (Budget Holder)</u>
<u>Deputy Head of School</u>	<u>Not usually a budget holder but may have been given authorisation to approve in the absence of Budget Holder – only if we have a signed form from BH</u>
<u>Department Heads</u>	<u>£5,000 (Budget Holder)</u>

64

~~61.4-61.4.~~ The ordering of goods and services shall be in accordance with the College's Financial Procedures and Procurement Toolkit. Where possible orders must be placed using the current e-procurement system.

~~61.2-61.5.~~ For any circumstances that we are unable to process purchase orders via the current e-procurement system then a Purchase Order Requisition must be completed in advance and passed to the Finance Department to raise the official College purchase order. Purchase orders must be in place in advance for the purchase of all goods and/or services rendered unless the goods or services are specified in the Finance Manual as excepted items.

~~61.3-61.6.~~ No verbal or email instructions are to be issued to suppliers in advance of requisitions and purchase orders being approved by the respective approvers in our current e-procurement system or our own Financial System.

~~61.4-61.7.~~ The College will not accept responsibility for meeting or reimbursing the cost of goods or services purchased in any other circumstances.

~~61.8.~~ All purchase order requisitions/orders must be placed using the purchase order template and be approved by a designated budget holder in accordance with the scheme of delegated authority.

~~61.5.~~

~~61.9.~~ It is the responsibility of the Director of Finance and Estates -to ensure that all purchase orders refer to the College's terms and conditions of contract.

~~61.6-~~

6262. Receipt of Goods

~~62.1-62.4.~~ All goods and services shall be received at designated receipt and distribution points. They shall be checked for quantity and/or weight and inspected for quality and specification.

- Formatted: Indent: Left: 0.39 cm, Hanging: 1 cm, No bullets or numbering
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm
- Formatted: Font: 12 pt
- Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm
- Formatted: Font: 12 pt
- Formatted: Normal, No bullets or numbering
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm
- Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93
- Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

62-2-62.5. If the goods received are deemed to be unsatisfactory, the supplier should be notified immediately, so that they can be collected for return as soon as possible. Where goods are short on delivery, again the supplier should be notified immediately.

Formatted: Outline numbered + Level: 2 + Numbering
Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned
at: 0.5 cm + Indent at: 1.77 cm

~~62.3-62.6.~~ Where possible, all persons receiving goods on behalf of the College should be independent of those who negotiated prices and terms and placed the official order.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 4 + Alignment: Left + Aligned at: 0.5 cm + Indent at: 1.77 cm

~~63.3.~~ Payment of Invoices

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 58 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Normal, No bullets or numbering

~~63.1.~~ ~~63.1.~~ All payments shall be in a form specified by the Director of Finance ~~and Estates.~~

~~63.2-63.1.~~ The Director of Finance ~~and Estates~~ is responsible for deciding the most appropriate method of payment for categories of invoice. Payments to UK suppliers will normally be made by BACS transfer.

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

~~63.3-63.2.~~ Budget Holders are responsible for ensuring that expenditure within their departments does not exceed an approved budget.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

~~63.4-63.3.~~ Suppliers should be instructed by the purchase order to submit invoices for goods or services to the Finance Department. Care must be taken by the delegated budget holder to ensure that discounts receivable are obtained.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

~~63.5-63.4.~~ Payments will only be made by the Finance Department against invoices that have been approved for payment. Payment in advance of the receipt of goods or services shall not be made except with the prior approval of the Director of Finance ~~and Estates.~~

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

~~63.6-63.5.~~ Approval of an invoice for payment will ensure that:

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

~~63.5.1.~~ The goods have been received, examined and approved with regard to quality and quantity, or that services rendered or work done is satisfactory.

Formatted: Outline numbered + Level: 3 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 1.5 cm + Indent at: 2.77 cm

~~63.5.2.~~ Where appropriate, the invoice is matched to the order.

~~63.5.3.~~ Invoice details (quantity, price discount) are correct.

~~63.5.4.~~ The invoice is arithmetically correct.

~~63.5.5.~~ The invoice has not previously been passed for payment.

~~63.5.6.~~ ~~Where appropriate~~Where appropriate, an entry has been made on a stores record or departmental inventory.

The College shall ensure that all invoices are paid within thirty (30) days. To assist with this all invoices should be approved timeously.

~~64.4.~~ Reporting of Expenditure

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

64.1. Appendix G sets out the levels for certain categories of expenditure above which the College should report annually to SFC through the Regional Strategic Body. The report should describe the number of instances and total cost, by category.

Formatted: Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

6565. Cash Floats

65.1. There may be certain College locations that hold cash floats, further detail is contained in the Finance Manual.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

6666. Other Payments

66.1. Payments for maintenance and other items to students on behalf of sponsoring organisations shall be made on the authority of the Director of Finance and Estates, supported by detailed claims approved by the budget holder.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0.93

66.2. Any other non-trade payments should be requested in a form prescribed by the Director of Finance and Estates and be authorised by the appropriate budget holder.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

6767. Late Payment Rules

67.1. The Late Payment of Debts (Interest) Act 1998 was introduced to give businesses the right to charge interest on late payments from large organisations and public authorities. In view of the penalties in this Act, invoices must be authorised for payment as soon as they are received, unless there is valid reason to withhold approval, and paid within the supplier's terms.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

6868. Leasing

68.1. Lease agreements for buildings must be approved and signed by the Director of Finance and Estates.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

68.2. Equipment may be acquired under an operating lease or a finance lease. Finance leases must be accounted for in the balance sheet in the normal manner. The Director of Finance and Estates must sign operating leases. Details of all lease agreements will be kept within the Finance Office and monitored by the Contracts and Procurement Co-ordinator in relation to expiry and renewals.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

PAY EXPENDITURE

6969. Remuneration

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

- 69.1. All College staff will be appointed in accordance with the appropriate conditions of service. All letters of appointment must be issued by the Human Resources department.
- 69.2. Remuneration and other benefits must fall within budget limits approved by the Board of Management.

Formatted: Outline numbered + Level: 2 + Numbering
Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned
at: 0.75 cm + Indent at: 2.02 cm

7070. Appointment of Staff

70.1. All contracts of service shall be concluded in accordance with the College's human resources practices and procedures and all offers of employment with the College shall be made in writing by the **HR Manager, Director of Organisational Development**. Budget holders must ensure that the Director of Finance **and Estates** and the **HR Manager Director of Organisational Development** are provided promptly with all information they may require in connection with the appointment, resignation or dismissal of employees.

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

7471. Salaries and Wages

71.1. The Director of Finance **and Estates** is responsible for the payment of salaries and wages to all staff including payments for overtime or other additional services rendered. All timesheets and other pay documents, including those relating to fees payable to external examiners, visiting lecturers or researchers, will be in a form prescribed or approved by the Director of Finance **and Estates**.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

71.2. The **HR Manager Director of Organisational Development** will be responsible for keeping the Director of Finance **and Estates** -informed of all matters relating to personnel for payroll purposes. In particular, these include the human resources policies approved for application in the College together with the following in relation to individual staff:

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

- ♦71.2.1. Appointments, resignations, dismissals, supervisions, secondments and transfers.
- ♦71.2.2. Changes in remuneration including normal increments and pay awards.
- ♦71.2.3. Information necessary to maintain records of service for superannuation, income tax and national insurance.

Formatted: Outline numbered + Level: 3 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 1.5 cm + Indent at: 2.77 cm

71.3. The Director of Finance **and Estates** is responsible for payments to non-employees and for informing the appropriate authorities of such payments. All casual and part-time employees will be included on the payroll.

71.3.

Formatted: Font: 12 pt

71.4. The Director of Finance **and Estates** shall be responsible for keeping all records relating to payroll including those of a statutory nature.

Formatted: Normal, No bullets or numbering

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

71.5. All payments must be made in accordance with the College Financial Procedures and comply with HMRC regulations.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

72.2. Superannuation Schemes

- 72.1. The Board of Management is the employer in relation to appropriate pension arrangements for employees.
- 72.2. The Director of Finance **and Estates** is responsible for day-to-day superannuation matters, including:

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

- ◆72.2.1. Paying contributions to various authorised superannuation schemes.
- ◆72.2.2. Preparing the annual return to various superannuation schemes.

72.3. The HR Manager Director of Organisational Development is responsible for administering eligibility for pension arrangements and for informing when deductions should begin or cease for staff.

73.3. Travel, Subsistence and Other Allowances

73.1. All claims for payment of subsistence allowances, travelling and incidental expenses shall be completed in a form approved by the Director of Finance and Estates and will be in accordance with the Financial Manual.

73.2. Claims by members of staff must be authorised by the budget holder. The certification by the budget holder shall be taken to mean that:

- ◆73.2.1. Journeys were authorised.
- ◆73.2.2. The expenses were properly and necessarily incurred.
- ◆73.2.3. The allowances are properly payable by the College.
- ◆73.2.4. Consideration has been given to value for money in choosing the mode of transport.

73.3. Claims for expenses by the Principal and Chief Executive shall be approved by the Chair of the Board of Management, and expenses for the Board of Management shall be approved by the College Secretary.

74.4. Giving Gifts and Hospitality

74.1. Staff entertaining guests from outside bodies should use the College catering facilities where possible, and within budget. Where this is not the case, claims for reimbursement should state clearly that they relate to hospitality and includes the necessary receipts and details required by the Financial Procedures

74.1.

74.2. Gifts and hospitality must be reasonable and proportionate, both in frequency and scale, to the nature of the relationship and must not exceed normal business courtesy. They must only be offered or accepted for the primary purpose of better presenting Inverness College UHI or establishing cordial relationships with business partners.

74.3. The offer of gifts and corporate hospitality should have a demonstrable link to the work of the College and represent good value for money.

74.4. A corporate gift is a tangible item or service given to another on behalf of an organisation. Common gifts include pens, diaries, calendars and other

Formatted: Outline numbered + Level: 3 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 1.5 cm + Indent at: 2.77 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0.93

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 3 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 1.5 cm + Indent at: 2.77 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

Formatted: Font: 12 pt

Formatted: Normal, No bullets or numbering

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

business stationery, keyrings, souvenirs, books, flowers, bouquets and promotional items.

7575. Overseas Travel

75.1. All arrangements for overseas travel must be in accordance with the Financial Manual. Any approvals required must be obtained in advance of committing the college to those arrangements or confirmation of any travel bookings. All overseas travel must be notified to the Financial Manager for insurance purposes.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

7676. Expenses for members of the Board of Management

76.1. _____ Claims for members of the Board of Management will be approved by the College Secretary as budget holder.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

7777. Severance and Other Non-Recurring Payments

77.1. Severance payments shall only be made in accordance with the relevant guidelines and legislation. In particular, the college must follow the requirements of the Scottish Public Finance Manual (SPFM) in determining settlement agreements, severance, early retirement and redundancy arrangements and payments. Any such scheme or payment must be approved by the SFC, through the Regional Strategic Body.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Font: 12 pt

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

77.2. The college must have regard to the principles of good practice contained in Audit Scotland's May 2013 report: 'Managing early departures from the Scottish public sector'.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

77.3. All payments must be authorised by the Principal and Chief Executive. Approval of early retirement packages, enhanced pension arrangements or financial packages in excess of statutory provision is reserved by the Board of Management after prior approval by the SFC. Any special severance payment out with a severance scheme approved by SFC in excess of £1,000 must be approved by SFC (see Appendix G).

Formatted: Not Highlight

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.93 cm

Formatted: Font: 12 pt

Formatted: Normal, No bullets or numbering

~~77.3.~~

77.4. All matters referred to an employment tribunal shall be notified to the Director of Finance and Estates at the earliest opportunity in order that budget provision may be made.

Formatted: Font: 12 pt

Formatted: Indent: Left: 1.02 cm, Hanging: 0.76 cm, Right: 0 cm, Space Before: 0 pt, No bullets or numbering, Tab stops: Not at 1.78 cm + 2.92 cm

Formatted: Normal, No bullets or numbering

~~77.4.~~

ASSETS

7878. Land, Buildings, Fixed Plant and Machinery

78.1. The purchase, lease or rent of land, buildings or fixed plant can only be undertaken with authority from the Board of Management and with reference to funding body requirements where exchequer-funded assets or exchequer

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

funds are involved.

7979. Fixed Asset Register

79.1. The Director of Finance and Estates is responsible for maintaining the College's register of capital assets. Budget holders will provide the Director of Finance and Estates with any information he or she may need to maintain the register.

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

8080. Property Register

80.1. The Director of Finance and Estates is responsible for maintaining a full register of properties owned or occupied by the College.

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

79.1. When transferring equipment between departments, the transfer must be recorded, a copy of the record sent to the Director of Finance and Estates and the inventories amended accordingly.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

8481. Stocks and Stores

81.1. Budget holders are responsible for establishing adequate arrangements for the custody and control of stocks and stores within their departments. The systems used for stores accounting in departments must have the approval of the Director of Finance and Estates.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

81.2. Budget holders are responsible for ensuring that regular inspections and stock checks are carried out. Stocks and stores of a hazardous nature will be subject to appropriate security checks. Advice should be obtained from the College's Health, Safety and Sustainability Manager.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

81.3. Budget holders whose stocks require valuation in the balance sheet must ensure that appropriate stocktaking procedures are in place and have the approval of the Director of Finance and Estates.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

8282. Safeguarding Assets

82.1. Budget holders are responsible for the care, custody and security of the buildings, stock, stores, furniture, cash, etc. under their control. They should contact the senior manager with responsibility for Estates in any case where security is thought to be defective or where it is considered that special security arrangements may be needed.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

82.2. Assets owned by the College shall, so far as is practical, be effectively marked to identify them as College property.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

8383. Personal Use

83.1. Assets owned or leased by the College shall not be subject to personal use except by approval by the Director of Finance and Estates.

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

8484. Asset Disposal

84.1. Disposal of equipment and furniture, whether by sale or otherwise, requires the prior written authorisation of the Director of Finance and Estates and must be in accordance with the Finance Manual.

84.2. Disposal of land and buildings must only take place with the authorisation of the Board of Management. Funding body consent may also be required if exchequer funds were involved in the acquisition of the asset.

FUNDS ON TRUST

8585. Gifts, Benefactions and Donations

85.1. The Director of Finance and Estates is responsible for maintaining financial records in respect of gifts, benefactions and donations made to the College and initiating claims for recovery of tax where appropriate.

8686. Student Support Funds

86.1. The Director of Finance and Estates will prescribe the format for recording the use of student funds. Records of support funds will be maintained according to funding body requirements.

8787. Trust Funds

87.1. The Director of Finance and Estates is responsible for maintaining a record of the requirements for each trust fund and for advising the Finance and General Purposes Committee on the control and investment of fund balances.

8888. Voluntary Funds

88.1. The Director of Finance and Estates shall be informed of any fund that is not an official fund of the College, which is controlled wholly or in part by a member of staff in relation to their function in the college. The accounts of any such fund shall be audited by an independent person and shall be submitted with a certificate of audit to the appropriate body. The Director of Finance and Estates shall be entitled to verify that this has been done.

OTHER

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

8989. Insurance

89.1. The Director of Finance and Estates is responsible for the College's insurance arrangements, including the provision of advice on the types of cover available. As part of the overall risk management arrangements, all risks will have been considered and those most effectively dealt with by insurance cover will have been identified. This is likely to include important potential liabilities and should provide sufficient cover to meet any potential risk to all assets. This portfolio of insurances will be reviewed annually.

89.2. The Estates function is responsible for keeping suitable records of plant which is subject to inspection by an insurance company and for ensuring that inspection is carried out in the periods prescribed.

89.3. All staff using their own vehicles on behalf of the College shall maintain appropriate insurance cover for business use at their own cost.

8990. Companies, Partnerships, Joint Ventures and Other Charitable Vehicles

90.1. In certain circumstances it may be advantageous to establish a company, joint venture or other appropriate legal entity to undertake services on behalf of the College. Any member of staff considering the use of such an entity should first seek the advice of the Director of Finance and Estates, who should have due regard to guidance issued by the funding body.

90.2. The Board of Management is responsible for approving the establishment of all companies or other legal entities. This will have regard to any guidance provided by the funding body.

90.3. It is the responsibility of the Board of Management to establish the shareholding arrangements and appoint directors of companies wholly or partly owned by the College.

90.4. The directors of companies where the College is the majority shareholder must prepare an annual report. They will also submit business plans or budgets as requested to enable the Finance and General Purposes Committee to assess the risk to the College. The College's internal and external auditors shall also be appointed to such companies.

90.5. Where the College is the majority shareholder in a company, that company's financial year shall be consistent with that of the College.

9491. Security

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

Formatted: Indent: Hanging: 1 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93

All staff, irrespective of grade, have a general responsibility for the security of all College property, although certain senior staff will have more specifically defined responsibilities.

Strategic and Operational Managers have responsibility for maintaining proper security, custody and control at all times of the plant, buildings, materials, stores, furniture, equipment, cash, etc. under their control. They should consult with the Estates Manager and/or a relevant member of the Executive Management Team in any cases where security is considered to be defective or where it is considered that special security arrangements may be required.

91.1. Keys to safes or other similar containers are to be kept securely at all times. The loss of such keys must be reported to the Director of Finance and Estates immediately.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

91.2. The ICT Manager shall be responsible for maintaining proper security and privacy of information held on the College's computer network. Appropriate levels of security will be provided, such as passwords for networked PCs together with restricted physical access for network servers. Information relating to individuals held on computer will be subject to the provisions of the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) 2018. The Data Controller shall be nominated to ensure compliance with the Act and the safety of documents.

Formatted: Not Highlight

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

91.3. The Director of Finance and Estates is responsible for the safekeeping of certain official and legal documents relating to the College. Signed copies of deeds, leases, agreements and contracts must, therefore, be forwarded to the Director of Finance and Estates. All such documents shall be held in an appropriately secure, fireproof location.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75 cm + Indent at: 2.02 cm

9292. Provision of Indemnities or Guarantees

92.1. Any request for indemnity or guarantee can only be given by the Director of Finance and Estates or the Principal.

Formatted: Indent: Left: 0.39 cm, Hanging: 1.12 cm, Outline numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 63 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.93 cm

APPENDIX A - Financial Memorandum

To Access the Financial Memorandum please click on the following link: **check these links**

<https://www.inverness.uhi.ac.uk/t4-media/one-web/inverness/about-us/board-of-management/6.FinancialMemorandumbetweenUniversityoftheHighlandsandIslands.pdf>

APPENDIX B - Key Contacts in Finance

The Finance Department is located in Room 101 of the first floor of the Beechwood Campus. There is also a cash office located on the first floor in Room 101 ~~e-atc at~~ the Beechwood Campus. The cash office is normally open between 9.00 and 15.00 (Monday to Friday).

In order to obtain maximum benefit from the Finance Department, it is important to observe any published deadlines. These deadlines have been established and agreed in order to guarantee the delivery of particular services which might not otherwise be achievable.

The main services offered by the Finance Department are noted below:

- Creditor payments
- Collection of income
- Payroll
- Travel service
- Insurance
- Financial accounting
- Capital projects
- Budget monitoring
- Budget planning
- Internal audit
- Policy and procedures
- Purchasing
- Contract development and maintenance
- Tendering management
- Operational issues re. vendors, purchases etc.
- Administration and payment of student support funds.
- Value for Money control

Director of Finance ~~and Estates~~ _____ 001463 279364279364
~~Shared Services~~ Accountant _____ 01463 273436

Formatted: Not Highlight

APPENDIX C - Capital Expenditure Appraisal

Purpose: to ensure that all capital expenditure proposals are suitably evaluated and properly authorised.

Outline capital expenditure proposals must be consistent with the aims and objectives of the College Strategic and Operational Plans, and also, where appropriate, other strategies and policies, including the Estates and ICT. Specific reference should be made in any proposal to the objective within the Strategic Plan that the proposal links to.

Any capital expenditure proposal should also include the following:

- The specification of the needs and objectives of the proposal within the context of the organisation's strategic plans.
- The identification of all available options.
- The valuation of the costs, benefits, timing and risks involved. The costs of the project must include any professional fees associated and also VAT.
- The identification of any available funding.
- The analysis of the results and assessment of affordability.
- The recommendation for the option selected.
- The extent and scope of the appraisal process will vary depending on the scale of the expenditure and the nature of the project. The extent of the appraisal will be determined by the Executive Management Team and will normally be carried out during the planning process cycle.

Capital Expenditure procedures must comply with the financial memorandum issued by the SFC (see Appendix 1), and for major projects, observe any specific procedural notes issued by the SFC. Proposals for all major projects will require to be supported by a full business plan.

Projects will be ranked by the Executive Management Team (EMT) in terms of priority to facilitate the decision making process and impose strict budgetary control. Available grant funding and the criteria and timing constraints imposed by grant providers will influence the evaluation process and the ranking of projects.

EMT will advise relevant College managers when approval has been given for capital expenditure. Finance will incorporate the expenditure into the annual capital expenditure plan.

If an organisation invests in a project, it expects a return, and deciding on a project involves making a long-term decision. One of the things organisations consider is the time value of money – if I have £5 now, how much is it worth in 4 years time? This is where we use the Net Present Value (NPV) method to appraise an investment opportunity. The other two main ways are the Internal Rate of Return (IRR) and the Payback method. The three methods are described below and assistance in their calculation can be sought from Finance.

The Principles of Discounted Cash Flow

The basic principle of discounting is that if we wish to have £x in so many years time, we need to invest y at an interest rate of z in order to get that sum of money.

Present value just means the amount of money which must be invested now to make a certain amount of money in so many years time.

Capital Investment Appraisal – Net Present Value (NPV) method

Discounted cash flow methods can be used to appraise capital investment projects. The two main methods are NPV and IRR, but there is also the payback method.

Net present value method - calculates the present values of all items of income & expenditure related to a project at a given rate of return & calculates a net total. If it is positive, then it is ok to invest in that project, but if it is negative, it is not a good investment.

Capital Investment Appraisal – Internal Rate of Return (IRR) method

The IRR method determines the rate of interest (the internal rate of return) at which the NPV is zero. The internal rate of return is therefore the rate of return on an investment.

The IRR method will indicate if a project is viable if the IRR exceeds the minimum acceptable rate of return.

Capital Investment Appraisal – Payback method

The payback period is the time that is required for the inflows to equal the outflows. Before it can be calculated, you must know the initial cash outflow & the estimate of future earnings/ savings.

There are two ways to use the payback period:

- a) Accept project with the shortest payback period.
- b) Have a payback period limit, where only projects which are less than the period limit will be accepted.

The Payback method is often used as a first step in project appraisal but it should not be used alone for decisions. If it passes the payback test, NPV or IRR should then be used.

Click on the links below for examples: [Check these links](#)

- [NPV Example](#)
- [Payback Example](#)

APPENDIX D - Summary of Protocols for Proposed Major Developments

Any proposal for major developments should be supported by a business plan for at least three years, which sets out:

- a demonstration of the proposal's consistency with the strategic plans approved by the governing body and with the College's powers under current legislation;
- details of the market need and the assumptions (based on reference data) of the level of business available;
- details of the business and what product or service will be delivered;
- an outline plan for promoting the business to the identified market and achieving planned levels of business;
- details of the staff required to deliver, promote and manage the business, together with any re-skilling or recruitment issues;
- details of any premises and other resources required;
- a financial evaluation of the proposal together with its impact on revenue and surplus, plus advice on the impact of possible alternative plans and sensitivity analyses in respect of key assumptions;
- contingency plans for managing adverse sensitivities;
- consideration of taxation and other legislative or regulatory issues; and,
- At least a three-year financial forecast for the proposal including a cash flow forecast and details of the impact on the College cash flow forecast for the financial years in question.

APPENDIX E - Internal Audit Responsibilities

The primary responsibility of the internal audit service is to provide the funding body, the Board of Management and managers of the College with assurance on the adequacy and effectiveness of the internal control system, including risk management and governance. Responsibility for internal control remains with management, who should recognise that internal audit can only provide 'reasonable assurance' and cannot provide any guarantee against material errors, loss or fraud. Internal audit also plays a valuable role in helping management to improve systems of internal control and so to reduce the potential effects of any significant risks faced by the College. Risk management provides the opportunity for internal audit work to be efficient and focused. It does not necessarily imply that internal audit activity has to be increased.

Internal audit can also provide independent and objective consultancy advice specifically to help management improve the internal control system, including risk management and governance. In such circumstances, internal auditors apply their professional skills in a systematic and disciplined way to contribute to the achievement of corporate objectives. Such advisory work contributes to the opinion that internal audit provides on internal control, including risk management and governance.

APPENDIX F – Procurement Thresholds

Inverness College UHI work with [Advanced Procurement for Universities and Colleges](#), to support the development of advanced procurement across the further and high education sector in Scotland.

The college has also signed up to the [Scottish Government's Suppliers' Charter](#) as part of our commitment to working together with other Public Sector buying organisations and Scottish businesses in order to improve public sector procurement processes and dialogue. When calculating the contract value, for a one-off purchase, the total cost of the good(s) or service(s) will provide the contract value. If the purchase is a recurring spend, the College will calculate the value over 4 years to establish the total contract value.

A national framework or local contract that meets the requirements must be used in the first instance for all tendering activity.

Inverness College is committed to carrying out 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. Inverness College demonstrate this through its promotion of the APUC Supply Chain of Conduct. A copy of the APUC Supply Chain of Conduct is located in the Finance Manual.

For Goods and Services

For Goods and Services greater than £50,000 and less than the OJEU thresholds – the College Procurement Team must undertake a formal tendering process and must advertise on the national advertising website Public Contracts Scotland. Additionally the Board of Management must provide approval.

Over EU Threshold – For Goods, Services and Works Projects must undertake a full formal tendering process and advertise the contract in the Official Journal of the European Union, as well as on Public Contracts Scotland (www.ojec.com/thresholds). This will be carried out by the College Procurement Team. Additionally the Board of Management must provide approval.

For Works Projects [check these values](#)

£2m – 4.1m – this must undertake a formal tendering process and must advertise on the national advertising website Public Contracts Scotland. This will be carried out by the College Procurement Team. Additionally Board of Management must provide approval.

>£4.1m – a full formal tendering process must be undertaking and advertise the contract in the Official Journal of the European Union, as well as on Public Contracts Scotland. <https://www.ojec.com/Thresholds.aspx> This will be carried out by the College Procurement Team with additional approval by the Board of Management.

Formatted: Normal, Justified, Indent: Left: 0.39 cm

Sustainable Procurement Duty

For Procurement exercises (>£50k Goods & Services / Works £2m) Inverness College is committed to the sustainable Procurement Duty and promises to:

Improve the economic, social, and environmental wellbeing of the authority's area, Facilitate the involvement of small and medium enterprises, third sector bodies; supported businesses in the process; and promote innovation.

Route 1 < £3000	Devolved Procurement Route	4 year spend to be checked and verified. Local / National Framework Agreements to be checked
<£500	By All Staff	1 quote or catalogue/internet print is required that meets with the Inverness College Value for Money Policy and approved by Budget Holder No Single Source Form required
>£500 <£1000	By Technicians / Delegates	2 quotes or catalogue/internet print is required that meets with the Inverness College Value for Money Policy and approved by Budget Holder Single source supply may be permitted on an exceptional basis only, and only where it is supported and evidenced with a clear, valid rationale approved by both the College Procurement team and the Budget Holder.
>£1000 < £3000	By Budget Holder or Delegate	Evidence of market research is to be provided - includes catalogue, internet print outs and 2 formal written quotes are required that meets with the Inverness College Value for Money Policy. Single source supply may be permitted on an exceptional basis only, and only where it is supported and evidenced with a clear, valid rationale approved by both the College Procurement team and the Budget Holder.
Route 2 >£3,000 & <£9,999	Devolved Procurement Route	4 year spend to be checked and verified. Local / National Framework Agreements to be checked
	By Budget Holder or Delegate	3 formal written quotes are required that meets with the IC Value for Money Policy. Single source supply may be permitted on an exceptional basis only, and only where it is supported and evidenced with a clear, valid rationale approved by the College Procurement team, the Budget Holder and the Director of Finance <u>and Estates</u> .

Route 3 >£10,000 & <£49,999	Regulated Procurement Route	4 year spend to be checked and verified. Local / National Framework Agreements to be checked
	By College Procurement Team	Competitive tendering on PCS using Quick Quote
Route 4A > £50,000 & Below OJEU	Regulated Procurement Route	4 year spend to be checked and verified. Local / National Framework Agreements to be checked
Below OJEU Threshold	By APUC / College Procurement Team	Competitive quotes on PCS-Tender
Route 4B OJEU Compliance	Regulated Procurement Route	4 year spend to be checked and verified for PCS-T & OJEU compliance. Local / National Framework Agreements to be checked
Supply, Services and Design Contracts >£181,302 (as at 1 January 2018)	By APUC / College Procurement Team	To be in compliance with the Scottish Government Procurement Regulations for the Public Sector and also the Procurement Reform (Scotland) Act 2014 Public Contracts (Scotland) Regulations 2015, Procurement (Scotland) Regulations 2016 and the statutory guidance.
Works Contracts >£4,551,413 (as at 1 January 2018)	By APUC / College Procurement Team	To be in compliance with the Scottish Government Procurement Regulations for the Public Sector and also the Procurement Reform (Scotland) Act 2014 Public Contracts (Scotland) Regulations 2015, Procurement (Scotland) Regulations 2016 and the statutory guidance.

Notes:

These thresholds will apply to all Enquiries or Contracts processed locally or through the Public Contracts Scotland Portal (PCS) and all purchase orders processed regardless of the system used e.g. PECOS, SUN, Credit Card transactions.

The use of any relevant Local and National Framework Agreements are also to be considered.

As per government regulations, the 4 year cumulative spend has to be reviewed to ensure it does not exceed £50K within a 4 year window - (4 x £12.5K) unless a National Framework Agreement exists.

It is important that the total lifecycle costing and impact mapping is considered.

Working towards cost savings and cost avoidance is paramount with greater focus towards improved efficiencies, contract management and budget/cost management will be monitored.

Requisitions must **not** be split into smaller order quantities in order to avoid the correct procurement route.

For Major Works projects over £4m Community Benefit Clauses will be considered and documented.

APPENDIX G – Delegated levels of authority for approval of purchase orders

The following delegated levels of authority for approvals are applicable when raising a purchase order.

Position	Financial Authority Level GBP £ Ex-VAT
<u>Board of Management</u>	<u>>£250,000</u>
<u>Director of Finance and Estates</u>	<u>>£75,000</u>
<u>Finance Manager</u>	<u>£5,000 (Budget Holder)</u>
<u>Principal & Chief Executive</u>	<u>>£75,000</u>
<u>EMT</u>	<u>£5,001 < £75,000</u>
<u>Tertiary Leader</u>	<u>£5,000 (Budget Holder)</u>
<u>Head of School</u>	<u>£5,000 (Budget Holder)</u>
<u>Deputy Head of School</u>	<u>Not usually a budget holder but may have been given authorisation to approve in the absence of Budget Holder – only if we have a signed form from BH</u>
<u>Department Heads</u>	<u>£5,000 (Budget Holder)</u>

Formatted: Heading 3, Indent: Left: 0.39 cm, Space Before: 4.6 pt

Commented [AM4]: I would suggest adding this section in here as its relevant for raising the purchase orders.

APPENDIX H – Purchasing - Contract Strategy Approval levels.

<u>Position</u>	<u>Financial Authority Level GBP £ Ex-VAT</u>	<u>Contract Strategy Approvals >£25K < £50K (Ex-VAT) Award Recommendation Reports</u>	<u>Contract Strategy Approvals Regulated > £50K (Ex-VAT) Award Recommendation Reports</u>	<u>> £25K & < £50K Contract Award Letter Contract Extension Letter Contract Variation Letter Novation of Contract Letter Contract Termination Letter</u>	<u>Regulated > £50K Contract Award Letter Contract Extension Letter Contract Variation Letter Novation of Contract Letter Contract Termination Letter</u>
<u>Board of Management</u>	<u>>£250,000</u>	<u>No</u>	<u>Yes above £250K</u>	<u>No</u>	<u>Yes above £250K</u>
<u>Director of Finance and Estates</u>	<u>>£75,000</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
<u>Principal & Chief Executive</u>	<u>>£75,000</u>	<u>No</u>	<u>Yes (in-lieu of FD)</u>	<u>Yes (in-lieu of FD)</u>	<u>Yes (in-lieu of FD)</u>
<u>EMT</u>	<u>£5,001 < £75,000</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>
<u>Tertiary Leader</u>	<u>£5,000 (Budget Holder)</u>	<u>Yes</u>	<u>Yes</u>	<u>N/A</u>	<u>N/A</u>
<u>Head of School</u>	<u>£5,000 (Budget Holder)</u>	<u>Yes</u>	<u>Yes</u>	<u>N/A</u>	<u>N/A</u>
<u>Department Heads</u>	<u>£5,000 (Budget Holder)</u>	<u>Yes</u>	<u>Yes</u>	<u>N/A</u>	<u>N/A</u>

Formatted: Font color: Text 1

APPENDIX I – Procurement Step by Step Guide



Procurement Step by Step Guide

This guide is to aid all staff when purchasing goods or services on behalf of UHI Inverness, to ensure public procurement regulations are adhered to.

Formatted: Font: 12 pt

Formatted: Font: 12 pt, Not Bold

Step 1	Define the need			
	<ul style="list-style-type: none"> ✓ Do we need to purchase or is there an alternative solution? ✓ Has budget been approved? ✓ Is sign off required from another department such as DPO, IT or Estates, if so, engage with relevant staff member. ✓ Create a robust specification for product or service required. ✓ Is the purchase exempt from Procurement Regulations, please refer to Non-Competitive Action policy. 			
Step 2	Determine contract value (excluding VAT)			
	<ul style="list-style-type: none"> ✓ Is the spend a one-off purchase? If so, follow the applicable route below. ✓ Is the spend likely to be recurring over the next 4 years? If so, multiply the annual spend by 4 and follow the applicable route below. 			
	< £5000 Devoled	>£5000-£49,999 Devoled	£50,000 - £177,887 <small>(Procurement Reform Act 2014)</small> Regulated	>£177,887 <small>(Government Procurement Agreement)</small> Regulated
	Route 1	Route 2	Route 3	Route 4
	<ul style="list-style-type: none"> ▪ Use a National Framework or local contract. ▪ If not available, must obtain one quote and attach to PECOS order. 	<ul style="list-style-type: none"> ▪ Use a National Framework or local contract. ▪ If not available, must obtain three written quotes and attach to PECOS order. ▪ Contracts above £50K should have a Contract Strategy and advertised and awarded on PCS Quick Quote unless a direct award via a National Framework. 	<ul style="list-style-type: none"> ▪ Procurement must facilitate tender and will require stakeholder input. ▪ Contract Strategy and Award Recommendation to be signed off by DLA. ▪ Use a National Framework or local contract. ▪ If not suitable, publish open tender and award notice on PCS. ▪ Publish on OJEU if EU funded. ▪ Publish Contract on Register. 	<ul style="list-style-type: none"> ▪ Procurement must facilitate tender and will require stakeholder input. ▪ Contract Strategy and Award Recommendation to be signed off by DLA. ▪ Use a National Framework or local contract. ▪ If not suitable, publish open tender and award notice on Find a Tender portal. ▪ Publish on OJEU if EU funded. ▪ Publish Contract on Register.
For assistance, please contact the procurement team: Derek Cowie: Derek.cowie@uhi.ac.uk Stuart Murray: Stuart.murray@uhi.ac.uk			www.publiccontractsscotland.gov.uk	

APPENDIX JG – Delegated Financial Limits and Annual Reporting Requirements

Formatted: Not Highlight

Delegated financial limits and annual reporting requirements for Regional Colleges and Regional Boards

Delegated financial limits

External Business and management consultancies	£100,000	Formatted: Not Highlight
Special severance payments	£1,000	Formatted: Not Highlight
Operating leases-non property	£250,000	Formatted: Not Highlight
Procurement non-competitive action	£25,000	Formatted: Not Highlight

Annual reporting requirements

Extra contractual payments	£5,000	Formatted: Not Highlight
Compensation payments	£5,000	Formatted: Not Highlight
Ex-gratia payments	£1,000	Formatted: Not Highlight
Claims waived or abandoned	£3,000	Formatted: Not Highlight
Write-off of bad debt	£3,000	Formatted: Not Highlight
Losses	£3,000	Formatted: Not Highlight
Overseas student irrecoverable loss	£6,000	Formatted: Not Highlight
Fraud loss	£5,000	Formatted: Not Highlight

Subject/Title:	Risk Management
Author: [Name and Job title]	Donald Taylor
Meeting:	Board of Management
Meeting Date:	19 th Dec
Date Paper prepared:	14/11/2023
Brief Summary of the paper:	Review of Risk Management Policy due to length of time it has been overdue review.
Action requested: [Approval, recommendation, discussion, noting]	Approval
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	
Resource implications:	Yes / No If yes, please specify:
Risk implications:	Yes / No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	Yes/No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	

Status – [Confidential/Non confidential]			
Freedom of Information Can this paper be included in “open” business* [Yes/No]			
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Policy/Procedure/Strategy: Risk Management Policy

Author/Owner: Director of Finance - Finance Shared Services – Donald Taylor- Di

Signature: Donald Taylor

Review Due: 14/09/2023

Department/Section: Finance Shared Services

Date of Assessment: 14/09/2023

Date: 08/11/2023

Step 1

Aim of proposed activity/decision/new or revised policy or procedure:

UHI Inverness's general approach is to minimise its exposure to risk. It will seek to recognise risk and mitigate the adverse consequences. However, the College recognises that in pursuit of its mission and academic objectives it may choose to accept an increased level of risk. It will do so, subject always to ensuring that the potential benefits and risks are fully understood before developments are authorised, and that sensible measures to mitigate risk are established.

- New
- Revised
- Existing

Who will be affected?	Who will be consulted?	Evidence available:
<p>Staff, members of the Board of Management, students, contractors, suppliers, members of the public or other public or private sector organisations'.</p>	<p>EMT</p>	<p>The University uses a standardised risk template, and this has been adopted by the Inverness College. The template and the methodology for recording risks was developed and agreed through the Finance Directors Practitioners Group and the process for completing and sharing risk registers was endorsed by Academic Partners Principals.</p> <p>The Audit Committee is responsible for monitoring the College's general arrangements for risk management and specifically for:</p> <ul style="list-style-type: none"> • Ensuring that corporate risks are properly managed, reviewing evidence to this effect and ensuring measurement of results as appropriate. • Advising the Board on the effectiveness of policies and procedures for risk assessment and risk management; • Annually reviewing the College's approach to risk management and, if appropriate, recommending changes or improvements to key elements of its processes and procedures; • Providing a statement to the Board annually indicating how the College has complied with good

		practice with regard to Corporate Governance and, in particular, in relation to effective risk management.
--	--	--

Step 2

Potential Positive/Negative/Neutral Impact Identified. P, N, N/I	Age	Disability	Gender Reassignment	Marriage/Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Eliminating Discrimination	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Advancing Equality of Opportunity	N/I	M/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Promoting Good Relations.	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I

Step 3

Sustainability	This policy has a positive impact on sustainability as the Risk Management Policy will cover all areas of risk and will not solely focus on commercial and financial risk.
----------------	--

Step 4

No Action to be taken

The Finance and General Purposes Committee is responsible for ensuring that the major risks associated with specific proposals put to it have been properly considered and can be appropriately managed within the policy framework set by the Board.

Equality Impact Assessment Form

Summary of EIA Outcome – please tick

- No further action to be carried out
- Amendments or changes to be made
- Proceed with awareness of adverse impact
- Abandon process – Stop and Rethink

Please forward completed EIA forms to the Quality Unit

UHI | INVERNESS

RISK MANAGEMENT POLICY

REFERENCE: **PL/XX/2XXX/XX**

Policy Owner	Director of Finance and Estates
Lead Officer	Interim Assistant Director of Finance
Review Officer	Director of Finance and Estates
Date first approved by BoM	10 December 2007
First Review Date	December 2010
Date review approved by BoM	18 December 2018
Next Review Date	November 2019
New Review Date	August 2023
Next Review Date	August 2026
Equality impact assessment	XX/XX/XXX
Further information (where relevant)	

Reviewer	Date	Amendment
Director of Corporate Services	20.12.10	Review approved by BoM
Director of Corporate Services	02.12.14	Review approved by BoM
Director of Corporate	24.12.15	Review approved by Audit Committee

Services		
Depute Principal	22.03.18	Review approved by BoM
Director of Finance	18.12.18	Review approved by BoM
Director of Finance and Estates	Sep 2023	

Changes made through to 08/11/23:

Added 1.4 Compliance

Added 1.5 Review

Any previous references to Senior Management Team (SMT) changed to Executive Management Team (EMT).

Any previous references to Director of Finance changed to Director of Finance and Estates.

Added Section 5 Compliance.

Added Section 6 Monitoring.

Added Section 7 Review.

Appendix 1 & 2 expanded with more detail shown on the risk matrix impact criteria.

Partnership Approach to Risk management changed from

The University uses a standardised risk template and this has been adopted by the College. The template and the methodology for recording risks was developed and agreed through the Finance Directors Practitioners Group and the process for completing and sharing risk registers was endorsed by Academic Partners Principals.

The criteria for measuring the likelihood of risks occurring and the gross impact of risks is attached at Appendix 1.

To

The University uses a standardised risk template, and this has been adopted by the College. The template and the methodology for recording risks was developed and agreed through the Finance Directors Practitioners Group and the process for completing and sharing risk registers was endorsed by Academic Partners Principals.

UHI uses a template risk register format and a standard 5 x 5 (likelihood x impact) scoring methodology. All identified risks are scored twice.

- Firstly, to identify a **gross risk** score based on a judgement of the likelihood of the risk occurring multiplied by a potential impact score assuming no mitigations are applied and.
- Secondly, to identify the **residual risk** score that is based on a re-assessment of the risk but considering any mitigation that is **in place and working** to reduce either the likelihood or the impact.

The criteria for measuring the likelihood of risks occurring and the gross impact of risks is attached at Appendix 1.

Contents

1	Policy Statement	4
2	Legislative framework/related policies.....	5
3	Overview	5
4	Scope	5
5	Compliance	4
6	Monitoring	4
7	Review	5
8	Risk Appetite	5
9	Partnership Approach to Risk management.....	6
10	Roles and Responsibilities.....	6
11	Appendix 1 Risk Matrix Impact Criteria	9
12	Appendix 2 Risk Matrix	10

1 Policy Statement

The Board of Management of Inverness College UHI has adopted this policy for the management of risk at the College. This policy forms part of the governance arrangements of the University of the Highlands and Islands.

The current policy statements on risk were reviewed and agreed by the University Court on 20 September 2017. The College has adopted the statements:

The College's general approach is to minimise its exposure to risk. It will seek to recognise risk and mitigate the adverse consequences. However, the College recognises that in pursuit of its mission and academic objectives it may choose to accept an increased level of risk. It will do so, subject always to ensuring that the potential benefits and risks are fully understood before developments are authorised, and that sensible measures to mitigate risk are established.

1.2 Overview and Scope

Risk is inherent in all activity. Risk management is important to ensure that all significant, relevant risks are understood and prioritised as part of normal management practices. Information on risk must be organised in a way that is useful for management purposes and enables decisions to be taken based on the knowledge of risk versus reward.

Identification and management of risk on a consistent, appropriate and timeous basis is a requirement of the University Court, as regional Strategic Body, and of the Scottish Funding Council (SFC).

The recognition and management of risk is the responsibility of everyone who allocates and/or uses resources so all members of staff should have an awareness of the risks of the organisation.

1.3 Implementation and Monitoring

The policy will be implemented through the Executive Management Team (EMT) of the College. A report comprising the corporate/high level risk register will be presented to the committee of the EMT and to the Board of Management Audit Committee for review and monitoring at each meeting.

1.4 Compliance

An annual report on the above by the appointed independent auditors will be made to the Audit Committee prior to the December meeting of the Board of Management.

1.5 Review

The Risk Management Policy and will be reviewed and presented to the Board of Management every three years for approval.

2 Legislative framework/related policies

- 2.1. [Health and Safety Policy](#)
- 2.2. ICT - UHI Partnership Information Security Acceptable Use Policy
- 2.3. Data Protection Policy
- 2.4. Financial Regulations
- 2.5. Data Protection Act 1998
- 2.6. General Data Protection Regulation (GDPR) (From 25 May 2018)
- 2.7. Business Continuity Plan.

3 Overview

Risk is inherent in all activity. Risk management is important to ensure that all significant, relevant risks are understood and prioritised as part of normal management practices.

Information on risk must be organised in a way that is useful for management purposes and enables decisions to be taken based on the knowledge of risk versus reward. Identification and management of risk on a consistent, appropriate, and timeous basis is a requirement of the University Court, as regional Strategic Body, and of the Scottish Funding Council (SFC).

4 Scope

The scope of this policy was initially developed to apply to faculties and departments of Executive Office and also to create a model of good practice methodology that could be adopted by Academic Partners. The College, as an integral part of the University, has adopted the policy to cover all aspects of its activity and operations.

5 Risk Appetite

The College will take a portfolio approach to risk management: i.e., whilst at any one time it may be carrying a high level of risks in one or more parts of its business, it will ensure that the number of areas exposed to high risk at any time are minimised and balanced with a low-risk approach in other areas.

The portfolio of risk will be regularly reviewed by the EMT, Audit Committee and Board of Management.

High risk areas will be very closely aligned to strategic priorities and aligned to high returns i.e., the College should not be exposed to high levels of risk if returns are likely to be minimal or if the activity is not business critical.

The elapsed time over which the College is exposed to a high level of risk in

any area should be minimised as much as possible.

6 Partnership Approach to Risk management

The University uses a standardised risk template, and this has been adopted by the College. The template and the methodology for recording risks was developed and agreed through the Finance Directors Practitioners Group and the process for completing and sharing risk registers was endorsed by Academic Partners Principals.

UHI uses a template risk register format and a standard 5 x 5 (likelihood x impact) scoring methodology. All identified risks are scored twice.

- Firstly, to identify a **gross risk** score based on a judgement of the likelihood of the risk occurring multiplied by a potential impact score assuming no mitigations are applied and.
- Secondly, to identify the **residual risk** score that is based on a re-assessment of the risk but considering any mitigation that is **in place and working** to reduce either the likelihood or the impact.

The criteria for measuring the likelihood of risks occurring and the gross impact of risks is attached at Appendix 1.

7 Roles and Responsibilities

7.1 The Director of Finance and Estates is the policy owner.

The recognition and management of risk is the responsibility of everyone who allocates and/or uses resources, so all members of staff should have an awareness of the risks of the organisation.

Risks need to be evaluated in a controlled manner and the uncertainties involved need to be minimised. The approaches available to managing risk include:

- Terminate – avoid risk by doing something else.
- Transfer – risk passed on to someone else e.g., outsourcing, insurance, subcontracting.
- Treat – reduce risks by management action.
- Tolerate – accept risk and manage appropriately.

7.2 Board of Management

The Board of Management has a fundamental role to play in the management of risk. Its role is to:

- Set the tone and influence the culture of risk management within the institution. This includes determining the risk appetite of the institution, i.e., determining what risks are acceptable and which are not, and to provide a framework within which the appropriate level of exposure to risk can be determined in particular circumstances; and;
- Approve major decisions affecting the College's risk profile or exposure.

7.3 Finance and General Purposes Committee

The Finance and General Purposes Committee is responsible for:

- Ensuring that the major risks associated with specific proposals put to it have been properly considered and can be appropriately managed within the policy framework set by the Board.

7.4 Audit Committee

The Audit Committee is responsible for monitoring the College's general arrangements for risk management and specifically for:

- Ensuring that corporate risks are properly managed, reviewing evidence to this effect and ensuring measurement of results as appropriate.
- Advising the Board on the effectiveness of policies and procedures for risk assessment and risk management;
- Annually reviewing the College's approach to risk management and, if appropriate, recommending changes or improvements to key elements of its processes and procedures;
- Providing a statement to the Board annually indicating how the College has complied with good practice with regard to Corporate Governance and, in particular, in relation to effective risk management.

7.5 Role of Internal Audit

A "risk based" internal audit plan is prepared taking account of the College's risk register, strategic plan and wider operating environment.

The College aims to progress towards "risk managed" which is defined as "Enterprise approach to risk management developed and communicated".

Internal audit will:

- Report its findings to the audit committee.
- Advise and make recommendations to senior managers as appropriate.

7.6 Executive Management Team

The Executive Management Team is responsible for:

- Implementing the Board's risk management policy and ensuring compliance
- Identifying, evaluating and managing strategic and operational risks in the College and bringing emerging corporate risks to the attention of the Board and/or its committees.
- Ensuring that everyone in each EMT member's area of responsibility understands their risk management responsibilities making clear the extent to which staff are empowered to take risks.
- Communicating College policy and information about the risk management programme to all staff and external partners as appropriate

APPENDIX 1

IMPACT - CRITERIA		TIMESCALE 3 YEARS		
Score	Description	Financial	Operational	Reputational (need to link to communications process for incident management)
5 Catastrophic	<ul style="list-style-type: none"> • A disaster with the potential to lead to loss of a major UHI partner • Loss of major funding stream 	<p>> £500,000 or lead to likely loss of key partner</p>	<ul style="list-style-type: none"> • Likely loss of key partner, curriculum area or department • Litigation in progress • Severe student dissatisfaction • Serious quality issues/high failure rates/major delivery problems 	<ul style="list-style-type: none"> • Incident or event that could result in potentially long term damage to UHI Inverness 's reputation. Strategy needed to manage the incident. • Adverse national media coverage. Credibility in marketplace and with stakeholders significantly undermined.
4 Major	<p>A critical event which threatens to lead to:</p> <ul style="list-style-type: none"> • Major reduction in funding • Major reduction in teaching / research capacity 	<p>£250,000 - £500,000 or lead to possible loss of partner</p>	<ul style="list-style-type: none"> • Possible loss of partner and litigation threatened • Major deterioration in quality/pass rates/delivery • Student dissatisfaction 	<ul style="list-style-type: none"> • Incident/event that could result in limited medium – short term damage to WHC's reputation at local/regional level. • Adverse local media coverage • Credibility in marketplace/with stakeholders is affected.
3 Significant	<p>A Significant event, such as financial/ operational difficulty in a department or academic partner which requires additional management effort to resolve</p>	<p>£50,000 - £250,000</p>	<ul style="list-style-type: none"> • General deterioration in quality/delivery but not persistent • Persistence of issue could lead to litigation • Students expressing concern 	<ul style="list-style-type: none"> • An incident/event that could result in limited short term damage to UHI's reputation and limited to a local level. • Criticism in sector or local press • Credibility noted in sector only
2 Minor	<p>An adverse event that can be accommodated with some management effort.</p>	<p>£10,000 - £50,000</p>	<ul style="list-style-type: none"> • Some quality/delivery issues occurring regularly • Raised by students but not considered major 	<ul style="list-style-type: none"> • Low media profile • Problem commented upon but credibility unaffected
1 Insignificant	<p>An adverse event that can be accommodated through normal operating procedures.</p>	<p><£10,000</p>	<ul style="list-style-type: none"> • Quality/delivery issue considered one off • Raised by students but action in hand 	<ul style="list-style-type: none"> • No adverse publicity • Credibility unaffected and goes unnoticed

Note: In line with UHI terminology and practice, the UHI Inverness has adopted the standard risk classification
 Select criteria most appropriate. Use highest score if more than one criterion applies.

APPENDIX 2

RISK MAP (for Gross Risk & residual risk)	TIMESCALE 3 YEARS				
	IMPACT				
5 - Catastrophic	5	10	15	20	25
4 - Major	4	8	12	16	20
3 - Significant	3	6	9	12	15
2 - Minor	2	4	6	8	10
1 - Insignificant	1	2	3	4	5
	1 - Very Rare	2 - Unlikely	3 - Possible	4 - Likely	5- Almost Certain
	LIKELIHOOD				

so that all potentially catastrophic impact risks are classified as red and all insignificant impact risks are green

LIKELIHOOD CRITERIA	TIMESCALE 3 YEARS	
Score	Description	Probability
5 - Almost Certain	More than likely - the event is anticipated to occur	>80%
4 - Likely	Fairly like - the event will probably occur	61-80%
3 - Possible	Possible - the event is expected to occur at some point	31-60%
2 - Unlikely	Unlikely - the event could occur at some point	10-30%
1 - Very Rare	Remote - the event may only occur in exceptional circumstances	<10%

Subject/Title:	Value for Money Policy
Author: [Name and Job title]	Donald Taylor
Meeting:	Board of Management
Meeting Date:	19 th Dec
Date Paper prepared:	14/11/2023
Brief Summary of the paper:	Part of the Finance Policies in need of updating.
Action requested: [Approval, recommendation, discussion, noting]	Approval
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	
Resource implications:	Yes / No If yes, please specify:
Risk implications:	Yes / No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	Yes/No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	

Status – [Confidential/Non confidential]			
Freedom of Information Can this paper be included in “open” business* [Yes/No]			
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Policy/Procedure/Strategy: Value for Money Policy

Author/Owner: Finance Shared Services – Donald Taylor

Signature: Donald Taylor

Review Due: 11/08/2026

Department/Section: Finance Shared Services

Date of Assessment: 08/11/2023

Date: 08/11/2023

Step 1

Aim of proposed activity/decision/new or revised policy or procedure:

The Board of Management is responsible for the proper use of the public funds allocated to it and for the effective control and management of the College. UHI Inverness is committed to achieving value for money ('VFM') from all its activities, which not only includes purchasing, but also use and safeguarding of assets, equipment, and resources. Adopt recognised good practice where this makes good sense.

- New
- Revised
- Existing

Who will be affected?	Who will be consulted?	Evidence available:
Staff, members of the Board of Management, students, contractors, suppliers, members of the public or other public or private sector organisations'.	EMT	Through benchmarking reports from APUC and annual Procurement Capability Assessments with reports being submitted to the College Finance & General Purposes committee on a quarterly basis. Operational Procurement Review (OPR) or Procurement and Commercial Improvement Programme (PCIP) Audits will be carried out by APUC in line with the required frequency and threshold levels, showing areas of strength, development areas and an action plan. Through competitive tendering activity and/or seeking alternative quotations. This will be done by an ongoing process through Budget Holders using the Financial Regulations and Finance Procedures. By using internal performance indicators, with reports going to the Board of Management on a quarterly basis.

Step 2

Potential Positive/Negative/Neutral Impact Identified. P, N, N/I	Age	Disability	Gender Reassignment	Marriage/Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Eliminating Discrimination	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Advancing Equality of Opportunity	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I
Promoting Good	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I

Relations.									
------------	--	--	--	--	--	--	--	--	--

Step 3

Sustainability	Positive. This policy will assist sustainability with the opportunity to enhance the economy and sustainability by adopting an effective Value for Money policy that does not solely concentrate on cost and pricing.
----------------	---

Step 4

No Action to be taken

Monitoring of contract management and associated costs including the identification of cost savings and cost avoidance. Local cost savings data will be reported to EMT. National cost savings will be reported by the APUC. An annual report on the above by the appointed independent auditors will be made to the Audit Committee prior to the December meeting of the Board of Management

Summary of EIA Outcome – please tick

- No further action to be carried out
- Amendments or changes to be made
- Proceed with awareness of adverse impact
- Abandon process – Stop and Rethink

Please forward completed EIA forms to the Quality Unit

Style Definition: Body Paragraphs

UHI | INVERNESS

VALUE FOR MONEY POLICY

REFERENCE: **PL/CS/2017/003**

Policy Owner	Director of Finance <u>and Estates</u>
Lead Officer	Interim Assistant Finance Director
Review Officer	Accountant
Date first approved by BoM	09 June 2008
First Review Date	June 2011
Date review approved by BoM	20 June 2011
Next Review Date	July 2020
Date review approved by EMT	XX August 2023
Equality impact assessment	Yes
Further information (where relevant)	

Formatted: Highlight

Formatted: Highlight

Reviewer	Date	Review Action/Impact
Finance Officer	09/06/2008	Review approved by BoM
Finance Officer	20/06/2011	Review approved by BoM
Accountant		Review approved by BoM
Director of Finance and Estates	Sep 2023	

Formatted: Highlight

Formatted Table

Formatted: Highlight

Amendments made to 08/11/23

Any references to Director of Finance changed to Director of Finance and Estates.

Any references to Senior Management Team (SMT) changed to Executive Management Team (EMT).
Added Section 3 Scope as below .

Formatted: Left

3. Scope

This policy aims to:

3.1. Integrate and enable the adoption of VFM principles within existing management, planning and review processes.

3.2. Adopt recognised good practice where this makes good sense.

3.3. Ensure that, mainly through the internal audit process, VFM studies are conducted on areas of activity identified as worthy of review.

3.4. Provide the framework to benchmark the college's activities against other similar activities and organisations where this is considered useful.

3.5. Provide the opportunity to enhance the economy, efficiency and effectiveness of activities.

3.6. Promote a culture of continuous improvement.

3.7. Ensure that financial savings for the college will be achieved without compromising any aspect towards the quality of service delivery.

3.8. Provide evidence to both internal and external observers, that the achievement of VFM is sought in all activities undertaken; and

3.9. Communicate to staff the recognition of their continuing obligation to seek VFM for the college as part of their routine activities.

Formatted: Left

Added into Section 6 Responsibility

6.6. Appendix 1 attached includes the Procurement Step by Step Guide to aid all staff when purchasing goods or services on behalf of UHI Inverness, to ensure procurement regulations are adhered to. This would include hospitality.

Formatted: Left

Added Section 8 Compliance

8. Compliance

8.1. An annual report on the above by the appointed independent auditors will be made to the Audit Committee prior to the December meeting of the Board of Management.

8.2. An annual procurement and value for money report is produced by procurement.

Added Section 10 Appendix 1 Procurement Step by Step Guide

Contents

1. Policy Statement.....	41.
Policy Statement.....	4
2. Legislative framework/related policies.....	42.
Legislative framework/related policies.....	4
3. Scope.....	4-3
4. Definition.....	55
5. Objectives.....	5.
Objectives.....	5
6. Responsibility.....	66.
Responsibility.....	6
7. Monitoring.....	77.
Monitoring.....	7
8. Compliance.....	7
8	
9. Review.....	7-8
.....	8
10. Appendix 1 Procurement Step by Step Guide.....	9

Formatted: Font: Bold

Formatted: Font: Bold

1. Policy Statement

The Board of Management is responsible for the proper use of the public funds allocated to it and for the effective control and management of the College.

Inverness College is committed to achieving value for money ('VFM') from all its activities, which not only includes purchasing, but also use and safeguarding of assets, equipment and resources.

2. Legislative framework/related policies

The legislative framework and related policies which we must comply with and operate within are:

2.1. Legislative framework:

- 2.1.1. The Procurement Reform (Scotland) Act 2014
- ~~2.1.2. The Public Contracts (Scotland) Regulations 201~~
- ~~2.1.3.2.1.2.~~ The Procurement (Scotland) Regulations 2016
- 2.1.3. [World Trade Organisation Government Procurement Agreement](#)
- 2.1.4. EU Procurement Directives 2014 [\(Externally Funded Projects only\)](#)

2.2. Related policies:

- 2.2.1. Financial Memorandum between UHI and Inverness College UHI (1 January 2016)
- 2.2.2. Local Governance (Inverness College Financial Regulations)
- 2.2.3. Equality Act 2010
- 2.2.4. Inverness College Procurement Strategy
- 2.2.5. Inverness College Strategic Plan
- 2.2.6. Inverness College Operational Plan

~~2.3.3.~~ Scope

This policy aims to:

- ~~2.4.3.1.~~ Integrate and enable the adoption of VFM principles within existing management, planning and review processes.
- ~~2.5.3.2.~~ Adopt recognised good practice where this makes good sense.
- ~~2.6.3.3.~~ Ensure that, mainly through the internal audit process, VFM studies are conducted on areas of activity identified as worthy of review.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Font color: Auto

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Indent: Left: 1.4 cm

Formatted: Indent: Left: 1.4 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

2.7.3.4. Provide the framework to benchmark the college's activities against other similar activities and organisations where this is considered useful.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

2.8.3.5. Provide the opportunity to enhance the economy, efficiency and effectiveness of activities.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

2.9.3.6. Promote a culture of continuous improvement.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

2.10.3.7. Ensure that financial savings for the college will be achieved without compromising any aspect towards the quality of service delivery.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

2.11.3.8. Provide evidence to both internal and external observers, that the achievement of VFM is sought in all activities undertaken; and

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

2.12.3.9. Communicate to staff the recognition of their continuing obligation to seek VFM for the college as part of their routine activities.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Indent: Left: 1.4 cm

Formatted: Indent: Left: 0.63 cm

3.4. Definition

The term 'value for money' (VFM) is commonly used to describe the combination of economy, efficiency and effectiveness:

3.1.4.1. Economy means minimising the cost of resources acquired or used, bearing in mind the quality;

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

3.2.4.2. Efficiency covers the relationship between the output of goods or services and the resources used to produce them; and

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

3.3.4.3. Effectiveness covers the relationship between the intended and the actual results of projects and programmes.

4.5. Objectives

In order to achieve good value for money, the objectives of this policy are to:

4.1.5.1. Integrate and enable adoption of value for money principles within the existing management, planning and review processes.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

4.2.5.2. Promote a College culture of continuous improvement and development on value for money issues.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

4.3.5.3. Adopt recognised best practice from Advanced Procurement for Universities and College (APUC) and Scottish Government Procurement regulations and guidelines where appropriate.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

~~4.4.5.4.~~ Provide a framework to benchmark the College activities against other similar activities and organisations where this is considered useful.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

~~4.5.5.5.~~ Ensure that through the internal audit process, value for money activities are reviewed.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

~~4.6.5.6.~~ Provide the opportunity to enhance the economy, sustainability, efficiency and effectiveness of activities.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

~~4.7.5.7.~~ Ensure that financial savings for the College will be achieved without compromising any aspect of the quality of service delivery, or access or inclusion.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

~~4.8.5.8.~~ Provide evidence to both internal and external auditors, that the achievement of value for money is sought in all activities undertaken by the College.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

~~5.9.~~ Communicate to all staff their obligation to seek value for money for the College as part of their routine activities, and to use all value for money tools available to them.

Formatted: Indent: Left: 1.27 cm

~~4.9.~~

Formatted: List Paragraph

~~5.10. Work~~ or collaborate with other UHI partners in delivering best practice or to deliver collaborative agreements.

Formatted: Indent: Left: 0.51 cm, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Indent: Left: 1.27 cm

~~4.10. — 5.11. Identify the total lifecycle costings and impact mapping in order to capture potential long term cost savings.~~

Formatted: Indent: Left: 0.63 cm, Hanging: 0.63 cm

~~4.11. — Identify the total lifecycle costing and impact mapping in order to capture potential long term cost savings.~~

5.6. Responsibility

~~5.1.6.1.~~ The responsibility for value for money lies with all staff within ~~Inverness College, and Inverness College and~~ is not restricted to those with financial responsibility or ~~executive management.~~

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Not Highlight

~~5.2.6.2.~~ As stated within the Financial Memorandum between UHI and the College, the College must have a strategy for reviewing systematically management's arrangements for securing value for money. As part of its internal audit arrangements, the College must obtain a comprehensive appraisal of management's arrangements for achieving value for money. A copy of this appraisal should be included in the College's Internal Auditors Annual Report

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

5-3-6.3. In addition, the Audit Committee Terms of Reference include the need to review and monitor aspects of the Colleges operations including advising the Board of Management appropriately on the economy, efficiency and effectiveness of the College's activities including value for money. The Audit Committee relays its view on the arrangements in its annual report to the Board of Management.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

5-4-6.4. Managers have the responsibility to be aware of good practices in their own area of operation and to ensure that these are followed appropriately.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

6.5. All staff should seek to achieve value for money in all activities and to bring to the attention of management any opportunities for improvement or financial savings.

Formatted: List Paragraph

5-5-6.6. Appendix 1 attached includes the Procurement Step by Step Guide to aid all staff when purchasing goods or services on behalf of UHI Inverness, to ensure procurement regulations are adhered to. This would include hospitality.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

6.7. Monitoring

Monitoring and assessing value for money will be achieved in a number of ways:

6-1-7.1. Through benchmarking reports from APUC and annual Procurement Capability Assessments with reports being submitted to the College Finance & General Purposes committee on a quarterly basis. Operational Procurement Review (OPR) or Procurement and Commercial Improvement Programme (PCIP) Audits will be carried out by APUC in line with the required frequency and threshold levels, showing areas of strength, development areas and an action plan.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

6-2-7.2. Through competitive tendering activity and/or seeking alternative quotations. This will be done by an ongoing process through Budget Holders using the Financial Regulations and Finance Procedures.

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

6-3-7.3. By using internal performance indicators, with reports going to the Board of Management on a quarterly basis. Indicators used are:

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

- contract usage data from APUC and the Scottish government;
- PECOS usage data including analysis of savings achieved and annual spend with consortiums of which we are members;
- VFM tests conducted through internal audit following audit recommendations;
- Internal Audit reports to the Audit Committee;
- results from reviewing the outcomes of an activity (i.e. tendering, quotations).

7.4. Monitoring of contract management and associated costs including the identification of cost savings and cost avoidance. Local cost savings data will be reported to EMT. National cost savings will be reported by the APUC.

7.8. Compliance

8.1. An annual report on the above by the appointed independent auditors will be made to the Audit Committee prior to the December meeting of the Board of Management.

7.4.8.2. An annual procurement and value for money report is produced by procurement.

8.9. Review

8.4.9.1. This policy will be reviewed in August 2023 and every three years thereafter.

Commented [AM1]: An annual procurement and value for money report is produced by procurement so not sure the statement about auditors is correct so maybe double check, it may be that this is done and I am just unaware.

Formatted: Font color: Black

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Formatted: Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.4 cm

Appendix 1

UHI INVERNESS

Procurement Step by Step Guide

This guide is to aid all staff when purchasing goods or services on behalf of UHI Inverness, to ensure public procurement regulations are adhered to.


Formatted: Font: 12 pt, Not Highlight

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt, Not Bold

Formatted: Font: 12 pt

Step 1	Define the need			
	<ul style="list-style-type: none"> ✓ Do we need to purchase or is there an alternative solution? ✓ Has budget been approved? ✓ Is sign off required from another department such as DPO, IT or Estates, if so, engage with relevant staff member. ✓ Create a robust specification for product or service required. ✓ Is the purchase exempt from Procurement Regulations, please refer to Non-Competitive Action policy. 			
Step 2	Determine contract value (excluding VAT)			
	<ul style="list-style-type: none"> ✓ Is the spend a one-off purchase? If so, follow the applicable route below. ✓ Is the spend likely to be recurring over the next 4 years? If so, multiply the annual spend by 4 and follow the applicable route below. 			
	< £5000 Devolved	>£5000-£49,999 Devolved	£50,000 - £177,887 (Procurement Reform Act 2014) Regulated	>£177,887 (Government Procurement Agreement) Regulated
	Route 1	Route 2	Route 3	Route 4
	<ul style="list-style-type: none"> ▪ Use a National Framework or local contract. ▪ If not available, must obtain one quote and attach to PECOS order. 	<ul style="list-style-type: none"> ▪ Use a National Framework or local contract. ▪ If not available, must obtain three written quotes and attach to PECOS order. ▪ Contracts above £50K should have a Contract Strategy and advertised and awarded on PCS Quick Quote unless a direct award via a National Framework. 	<ul style="list-style-type: none"> ▪ Procurement must facilitate tender and will require stakeholder input. ▪ Contract Strategy and Award Recommendation to be signed off by DLA. ▪ Use a National Framework or local contract. ▪ If not suitable, publish open tender and award notice on PCS. ▪ Publish on OJEU if EU funded. ▪ Publish Contract on Register. 	<ul style="list-style-type: none"> ▪ Procurement must facilitate tender and will require stakeholder input. ▪ Contract Strategy and Award Recommendation to be signed off by DLA. ▪ Use a National Framework or local contract. ▪ If not suitable, publish open tender and award notice on Find a Tender portal. ▪ Publish on OJEU if EU funded. ▪ Publish Contract on Register.
For assistance, please contact the procurement team: Derek Cowie: Derek.cowie@uhi.ac.uk Stuart Murray: Stuart.murray@uhi.ac.uk			www.publiccontractsscotland.gov.uk	

Formatted: Space After: 8 pt, Line spacing: Multiple 1.08 li

Subject/Title:	KPI Matrix
Author: [Name and Job title]	Martin Whyte
Meeting:	Board of Management
Meeting Date:	19 December 2023
Date Paper prepared:	11 December 2023
Brief Summary of the paper:	To provide the Board of Management with an overview of the performance against KPI measures in scope YTD 2023-24.
Action requested: [Approval, recommendation, discussion, noting]	Discussion
Link to Strategy: Please highlight how the paper links to, or assists with: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	Each set of KPI measures corresponds to a section of our strategic plan and their sub strategies. They provide quantitative measurements and are presented in a BRAG format in order to provide a visible overview of our progress toward each KPI.
Resource implications:	No If yes, please specify:
Risk implications:	No If yes, please specify: Operational: Organisational:
Equality and Diversity implications:	No If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	Staff, managers and Board Committees

Status – [Confidential/Non confidential]	No		
Freedom of Information Can this paper be included in “open” business* [Yes/No]	Yes		
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Recommendation(s)

For discussion.

Purpose of report

This report provides the Board with summary information of our performance against the agreed key performance measures that are in scope year to date. The data and RAG rating for each measure in scope is provided as at the end of period 4 – November 23, with the exception of two measures for which actual November data is to be completed. Those measures are:

- Room Occupancy – Frequency %.
- GTFM % Reactive task completion rate.

The monitoring and reporting frequency is established for each measure; for example student numbers are monitored weekly therefore the data for the KPI matrix is profiled and reported monthly, whereas NSS and SSES surveys are undertaken and reported annually.

A brief narrative for each measure not yet meeting performance expectation is detailed below.

Appendix A provides the KPI Matrix report as at 30th November (period 4).

Narrative on Measures YTD.**Serial 6. Apprenticeship Income. RAG 90.1%**

Actual income YTD is £53k behind plan. There is £33k of outstanding claims for the period much of which relates to those apprentices who complete SVQ units in a holistic manner and for which resulting can't yet be completed. Later resulting for some units will feed through to the December claim. There is £8.8k of declined claims due to evidence or signatures not being provided to SDS within the required timeframe. Business Solutions and curriculum colleagues meet regularly to discuss.

Serial 11. HE PPF FTE. RAG 89.2%

Data is provided as at 30 Nov 23. HE FTE student recruitment is below expectation YTD. The MIS Manager monitors student recruitment data daily and more up to date information is available. Initiatives such as January start courses, fee waivers, and other activities are planned to increase HE FTE numbers.

Serial 34. FE Progression to HE – actual. RAG 85.7%

Annual measure which reports on the percentage of HE enrolments that have progressed from FE study. The objective is 35%, with the actual progression rate of 30% being achieved. 30% exceeds the performance in the prior year. This metric is important for curriculum leaders to monitor. A variety of factors influence this metric, a key one being the availability of employment opportunities.

Serial 36. Learning Support appointment offered. RAG 98.1%

The measure is marginally below plan YTD. The percentage has improved significantly from period 2 to date (period 2 – 60%). A substantial number of ASN disclosures were received in September and the team have done a tremendous job turning these around and providing support to students. Performance for both October and November is 100%.

Serial 40. Sickness Levels. RAG 152.5%

3.6% absence against YTD measure of 2.36%. HR Manager and colleagues have access to all data and awareness of any underlying issues and trends. HR, Payroll/Finance, Operations monitor for impact on current budget provision and budget planning.

Serial 47. Number of Workplace Injuries. RAG 473%

71 reported injuries against plan of 15 YTD. Health, Safety and Sustainability Manager monitors the reports closely and is aware of recurring types of injury. Although the percentage and number is very high against plan, the HS&S Manager and EMT are pleased with the improved culture and attitude towards reporting injuries. HS&S manager will review the 'target' for 2024-25.

Serial 49. % of Staff Completed Mandatory iHASCO training. RAG 77.5%

The HS&S Manager, College Management Team (CMT), and EMT have focused on this recently and the Principal has issued a communication to all staff reminding them of the requirement to complete the mandatory training before 22nd December.

Serial 60. CO2 Emissions on Utilities (Gross) Tonnes. RAG 123.8%

YTD the measure is 37 tonnes ahead of plan YTD (193 vs 156). HS&S Manager and Estates have advised that there are two factors causing the increase. Firstly, the government have recently revised the conversion factors applied to electricity and gas consumption which has resulted in an increase in CO2 emission tonnage per unit compared to last year. In conjunction, consumption has been higher and the mix of the consumption affects emissions – for example, as reported on 2nd Nov – “7% change to emissions factor 'caused by an increase in natural gas usage and decrease in renewables usage compared to last year”

Serial 64. Total % Capital Expenditure Committed. RAG 44%.

Below profiled expectation, however projects have been identified and discussions progress with GTFM/contractors to progress commitment to these works. Capex will be committed by the end of the reporting period (Mar 24).

Performance Measures
AY: 2023-2024

Performance Measures- EMT & Board of Management

Measures - Linked to Profile and Actual sheets

AY Start	01 Aug 2023
Today	11 Dec 2023
Period Month	November
No.Periods YT	4

Key:

B = Not yet in scope	
R = Not Achieved	
A = Partially Achieved	
G = Achieved	

Measure		Measurement Frequency	2022/23 Actual	2023/24 Target	YTD Profile	YTD ACTUAL	YTD ACTUAL v PROFILE RAG
3	FE Credits	Monthly	30569	26,657	23,000	23,695	103.0%
4	Apprenticeship starts (contract year)	Monthly	385	280	197	208	105.6%
5	Apprentices in Learning (average in year)	Monthly	651	650	666	670	100.6%
6	Apprenticeship Income (excluding T&A)	Monthly	£1,248,012	£1,348,050	£543,352	£489,517	90.1%
7	FWDF Income	2 monthly	£294,495	£150,000	£75,000	£149,926	199.9%
8	Commercial Short Course Income	Monthly	£137,191	£129,996	£43,332	£54,538	125.9%
9	HE enrolments (head count)	Monthly	1,986	1,986	1,700	1,942	114.2%
10	HE enrolments (year one starts)	Annual	523	670	670	697	104.0%
11	HE PPF FTE (from Oct)	Monthly	1,251.8	1,418.0	1,300.0	1,159.7	89.2%
13	GA Programmes - New Enrolments (confirm monitoring period) (23/24 benchmark yr)	Monthly				92.0	
14	Senior Phase Enrolments (23/24 benchmark yr)	Annual				636.0	
18	Early Satisfaction & Engagement Survey (ESES)	Annual	95.3%	96%	96.0%	96.0%	100.0%
32	Modern Apprenticeship successful outcomes (contract year)	Monthly	61.0%	65%	65.0%	67.8%	104.3%
33	FE progression to further FE study	Annual	33.8%	35%	35.0%	37.1%	106.0%
34	FE progression to HE - actual	Annual	10.0%	35%	35.0%	30.0%	85.7%
35	Mental Health Support appt (non-emergency) offered for within 3 - 10 working days	Monthly	83.0%	91.7%	91.7%	100%	109.1%
36	Learning Support appt offered for within 6 - 20 working days	Monthly	77.0%	91.7%	91.7%	90%	98.1%
40	Sickness levels	Quarterly	2.80%	2.52%	2.36%	3.60%	152.5%
41	- Short Term	Quarterly				1.67%	
42	- Long Term	Quarterly				1.93%	
43	% Staff turnover	Quarterly	2.37%	3.35%	5.13%	3.44%	67.1%
47	Number of workplace injuries	Monthly	26	26	15	71	473.33%
48	Number of RIDDOR reportable accidents and illness	Monthly	1			1	
49	% of staff completed mandatory IHASCO (H&S) Trg	Quarterly	86%	80%	80.0%	62.0%	77.5%
52	Adjusted current ratio	Quarterly		1.7	1.7	2.8	164.7%
55	Cash days in hand	Quarterly		62.0	62.0	88.1	142.1%
58	Analysis of aged debtors > 90 days	Quarterly		50.0%	50.0%	8.1%	16.2%
59	Room Occupancy - Frequency %	Monthly	19.0%	35.0%	32.0%	32.4%	101.3%
60	CO2 Emissions on Utilities (gross) Tonnes	Monthly	553	553	156	193	123.8%
61	% waste sent to landfill	Quarterly	70.0%	15%	15.0%	9.0%	59.7%
62	Estates reactive task completion rate %	Monthly	96%	95%	95%	94.5%	99.5%
63	GTFM % reactive task completion rate	Monthly	93%	92%	92%	96.0%	104.3%
64	Total % of Capital expenditure budget committed (Aug - March)	Monthly	100%	100%	50%	22.0%	44.0%

UHI | INVERNESS

Subject/Title:	Principal's Report
Author: [Name and Job title]	Professor Chris O'Neil Principal
Meeting:	Board of Management
Meeting Date:	19 December 2023
Date Paper prepared:	11 December 2023
Brief Summary of the paper:	<p>This report provides the Board of Management with an overview of new and continuing activity including:</p> <ul style="list-style-type: none"> • UHI 2024 and the Targeted Operating Model, TOM • Partnership Finances • Finance Team • Longman Disposal • Business Development and the Green Freeport
Action requested: [Approval, recommendation, discussion, noting]	For Discussion

Link to Strategy: Please highlight how the paper links to, or assists with: <input type="checkbox"/> compliance <input type="checkbox"/> partnership services <input type="checkbox"/> risk management <input type="checkbox"/> strategic plan <input type="checkbox"/> new opportunity/change	Strategic plan		
Resource implications:	Yes / No N/A If yes, please specify:		
Risk implications:	Yes / No N/A If yes, please specify:		
Equality and Diversity implications:	Yes/ No If yes, please specify:		
Student Experience Impact:	Yes/No If yes, please specify: Financial implications ESES Strike Action		
Consultation: [staff, students, UHI & Partners, External] and provide detail			
Status – [Confidential/Non confidential]	CONFIDENTIAL		
Freedom of Information Can this paper be included in “open” business* [Yes/No]	No		
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (s33)	Yes	Its disclosure would constitute a breach of confident actionable in court (s36)	
Its disclosure would constitute a breach of the Data Protection Act (s38)	Yes	Other (Please give further details)	

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Board of Management

Subject/Title:	Working in Partnership Report
Author: [Name and Job title]	Quality and HISA
Meeting:	Board Committee
Meeting Date:	19 th December
Date Paper prepared:	11 th December
Brief Summary of the paper:	The paper provides an update on the activity
Action requested: [Approval, recommendation, discussion, noting]	Discussion
Link to Strategy: Please highlight how the paper links to, or assists with:: <ul style="list-style-type: none"> • compliance • partnership services • risk management • strategic plan • new opportunity/change 	The paper assists with the Quality Assurance and Enhancement strategy; and the student partnership agreement.
Resource implications:	If yes, please specify:
Risk implications:	If yes, please specify:
Equality and Diversity implications:	If yes, please specify:
Consultation: [staff, students, UHI & Partners, External] and provide detail	

Status – [Non confidential]	Non-confidential
Freedom of Information Can this paper be included in “open” business* [Yes]	
*If a paper should not be included within “open” business, please highlight below the reason.	

Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (S33)		Its disclosure would constitute a breach of confidence actionable in court (S36)	
Its disclosure would constitute a breach of the Data Protection Act (S38)		Other (please give further details)	
For how long must the paper be withheld? (express either as the time which needs to pass or a condition which needs to be met.)			

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Working In Partnership 2023-24 – summary update

Meet the Team

- Emma Baillie Quality Officer, UHI Inverness
- Elizabeth Keegan HISA Inverness President
- Holly Pearce HISA Depute President – Education
- Joseph Sweeney HISA Depute President – Activities & Welfare
- Méabh O'Connor Campus Co-ordinator, UHI Inverness

Working In Partnership – the model

UHI INVERNESS

Where learning means more

Working in Partnership



At the beginning of each academic year, the Student's Association and UHI Inverness jointly select 3 areas from the Partnership Agreement to focus on together over the course of the academic year. These areas will have specific, measurable actions to work on – things that will make a real difference to the student experience and things that are worked on in partnership. Called Enhancement Themes, for this year are Collective Responsibility, Tools for Learning, Student Life

Actions are monitored through our Achieved Together Tracker & Plan. This includes the anticipated impact, timescales and how this will be shared with the student body once completed.

Student Representatives - update

Student Rep SharePoint Site

- This SharePoint site is new for 2023-24
- A single site for all SVRs, HISA team, and UHI Inverness colleagues to access
- All information needed for both types of reps (SVR & SER)

Student Voice Reps (SVR)

- Elected in class, trained by HISA
- 75 reps recruited to date
- Attend Course Committee Meetings
- Attend Student Voice Rep Council
- New for 2023 – 24, SVRs will receive signed record of work experience

Student Engagement Reps (SER)

- A new role for 2023-24
- Self-nominate and get involved in specific area(s)
- Develop skills and gain valuable work experience
- Staff across UHI Inverness leading on twelve different areas
- SERs will receive signed record of work experience
- 13 SERs signed up to date.

Summary of Activity – the wider student body:

- Halls of Residence Welcome
- Social space for students including the introduction of a Games Cupboard
- Highlife Highland schedule of Health & Fitness classes on campus
- Freshers Fayres at Main Campus & Scottish School of Forestry
- Forestry Olympics
- HISA inductions in classes
- ESES – first all student survey of the year
- Communications with Stagecoach and Inverness businesses on Electronic ID
- Halloween – costume contest event
- Sports Freshers
- Hunt the Haggis

Communication

- The Link Newsletter
- Greater promotion on HISA social media accounts
- Noticeboards review, including an Enhancement Theme noticeboard walkway on the way to the Corrie.
- Events plan for year ahead internally plan and prepare to make them as good as they can be

Going Forward

Student Life

- Jingle Jog and Christmas Craft Fayre
- Movie Night
- Writing Competition
- Clubs & Societies
- HLH schedule for Semester 2
- Refreshers Fayre

Collective Responsibility

- Marketing videos on Student Code of Conduct
- Promotion of accessible student code of conduct and signage
- Cash For Kids Mission Christmas - Christmas Toy Drive

Tools For Learning

- Brightspace Top Tips in The Link Newsletter
- Continue to promote Social Media accounts
- Research into MyDay push notifications for key messages

CHI | INVERNESS

Subject/Title:	Governance Update
Author: [Name and Job title]	Ludka Orłowska-Kowal Governance Officer
Meeting:	Board of Management
Meeting Date:	19 December 2023
Date Paper prepared:	11 December 2023
Brief Summary of the paper:	This paper provides the Board of Management with an update on all governance matters.
Action requested: [Approval, recommendation, discussion, noting]	Discussion and Noting.
Link to Strategy: Please highlight how the paper links to, or assists with:: <input type="checkbox"/> compliance <input type="checkbox"/> partnership services <input type="checkbox"/> risk management <input type="checkbox"/> strategic plan <input type="checkbox"/> new opportunity/change	Governance Compliance
Resource implications:	Yes / No If yes, please specify:

Risk implications:	Yes / No If yes, please specify: Operational: Organisational:		
Equality and Diversity implications:	Yes/No If yes, please specify:		
Student Experience Impact:	Yes/No If yes, please specify:		
Consultation: [staff, students, UHI & Partners, External] and provide detail	N/A		
Status – [Confidential/Non confidential]	Non-Confidential		
Freedom of Information Can this paper be included in “open” business* [Yes/No]	Yes		
*If a paper should not be included within “open” business, please highlight below the reason.			
Its disclosure would substantially prejudice a programme of research (S27)		Its disclosure would substantially prejudice the effective conduct of public affairs (S30)	
Its disclosure would substantially prejudice the commercial interests of any person or organisation (s33)		Its disclosure would constitute a breach of confident actionable in court (s36)	
Its disclosure would constitute a breach of the Data Protection Act (s38)		Other (Please give further details)	

Further guidance on application of the exclusions from Freedom of Information legislation is available via

<http://www.itspublicknowledge.info/ScottishPublicAuthorities/ScottishPublicAuthorities.asp> and

http://www.itspublicknowledge.info/web/FILES/Public_Interest_Test.pdf

Nomination for Vice Chair Position

As you are aware the Vice Chair stood down from the Board of Management in September 2023. We are now looking for nominations for the position to ensure our continuing compliance with the Code of Good Governance.

The process for nominations is as follows:

- Nominations are invited.
- All nominations must be seconded.
- Nominations must be provided to the Governance Officer, in writing, at least 7 days prior to the next Board of Management Meeting due to be held on 13 February 2024.

At the Board Meeting scheduled for 13 February 2024, any nominations made will be subject to a ballot:

1. Nominated members will be provided with the opportunity to address the Board of Management for no more than 5 minutes, prior to votes being cast.
2. In the case of a sole nomination, members will be asked to support the nomination. In the event of a dead heat, a second ballot will take place. If a simple majority vote does not support the nomination, the position will remain vacant and will be reconsidered at the next Board of Management meeting.
3. Votes cast will be counted by the Governance Officer and a scrutineer. The result will be announced by the Governance Officer and recorded and signed by her and the scrutineer.

Audit Committee Chair

As some of you are aware Janette Campbell became our newest Non-Executive Board Member in October and has since been elected to the position of Chair of the Audit Committee.

New Co-opted Board member

Janette's progression has left the Board in a need of a new Co-opted Member. Meetings have taken place over the last few weeks to discuss skills matrix needed and it has been agreed that the new Co-opted member should have HE and Legal experience. Professor Peter James Francis has been approached by the Principal and the Chair of the Board and has since accepted offered position and sent us his CV and an official letter of interest.

Search and Nominations Committee has approved the nomination and agreed the selection panel which will meet in January to conduct a panel interview with Professor Peter James Francis.

HR Committee

In respect of the HR Committee, despite the successful recruitment campaign, no additional members came onto this Committee and with an existing member having stood down recently, Committee membership is at 4. It is requested that members who are currently only sitting on one Committee consider joining the HR Committee to ensure that we meet the membership numbers laid out in our Terms of Reference.

Trade Union Nominees on Boards

At the end of October the Scottish Government advised that there has been a delay in laying the Draft Order to the Scottish Parliament as part of the necessary amendments to legislation to give effect to the policy change to allow trade union nominees on boards of incorporated colleges and regional strategic bodies. The new timeline indicates that the recognised trade unions will now commence the election process in January 2024, with new board members formally elected to boards by 31st January 2024.

Subject/Title:	Complaints Report for Quarter 1 (Aug - Oct) 2023-24
Meeting and date:	November 2023
Author:	Stephen Wells, Quality Officer
Decision, Discussion or Noting:	Noting
Link to Strategic Plan:	Paper assists with compliance as the College is required to monitor complaints as per SPSO requirements.
Cost implications:	Yes / No <i>(delete as applicable)</i> If yes, please specify:
Risk assessment:	Yes / No <i>(delete as applicable)</i> If yes, please specify: Financial: Operational: Organisational:

Recommendation(s)

Note

Purpose of report

Analysis of complaints received in Quarter 1 of 2023-24

Background

Reports are required to ensure compliance with SPSO requirements and identify areas of service that require improvement. Summary outcomes are published on the Inverness College website (FE) and UHI website (HE)

Following the Complaints Management audit undertaken by BDO in May the following additional information is included in the Quarterly and Annual reports. These are within the Complaint Outcomes and Complaint Timescales sections of the report.

- The number of complaints closed in full at stage 1 within five working days as a percentage of all stage 1 complaints responded to in full.
- The number of complaints closed in full at stage 2 within 20 working days as a percentage of all stage 2 complaints responded to in full.
- The average number of working days to resolve a complaint after escalation.
- The outcome of complaints after escalation.
- The percentage of complaints upheld, partially upheld, not upheld and resolved at stage 1, stage 2 and after escalation.

Main body of information

See attached.

UHI | INVERNESS

Summary Report: Complaints 2023-24 (Q1)

Introduction

Complaints are received all year round from a number of different sources although the primary source tends to be from students. Complaints are received via a variety of mechanisms including direct emails, complaints forms and the Red Button. IC UHI uses the SPSO categories and sub-categories to classify complaints, which allows us to feed into sector wide data. The outcomes from complaint resolution are reported to UHI (HE) and published on the UHI Inverness website (FE).

Complaints are grouped into quarters depending on the time of year in which they are received. The quarter dates are detailed below:

- Quarter 1 (Q1): August – end of October,
- Quarter 2 (Q2): November – end of January,
- Quarter 3 (Q3): February – end of April,
- Quarter 4 (Q4): May – end of July.

This report provides an overview of the complaint categories and outcomes across academic year 2023-24 for Quarter 1.

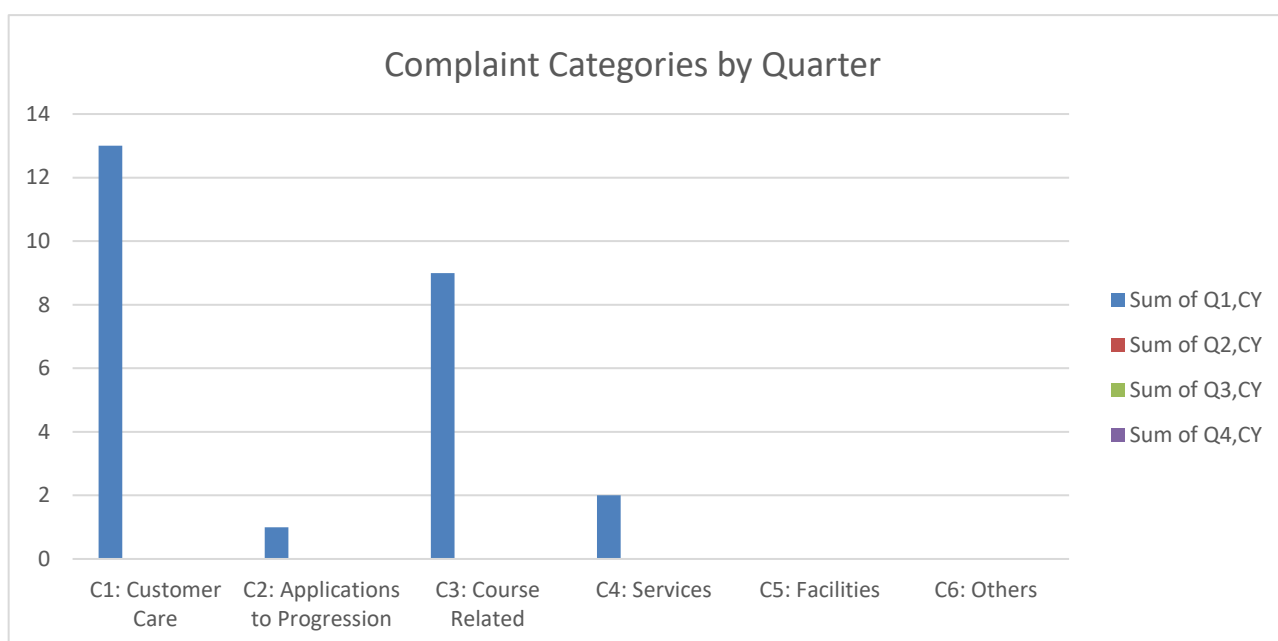
Complaints by Category

25 complaints were received in Q1, an increase from 18 received in the same quarter last year. This is largely due to the additional complaints in the 'Customer Care' category which increased from 2 in Q1 last year, to 13 this year. The category 'Facilities' has seen a decrease from 6 complaints in Q1 last year to 0 for the same period this year.

The graphs below display the sum of quarterly complaints received for each category.

Customer Category: Current Year (Quarter) 2023/24	YTD CY	Q1,CY	Q2,CY	Q3,CY	Q4,CY
C1: Customer Care	13	13			
C2: Applications to Progression	1	1			
C3: Course Related	9	9			
C4: Services	2	2			
C5: Facilities	0	0			
C6: Others	0	0			
TOTAL	25	25			

Customer Category: Current Year (Quarter) 2022/23	YTD CY	Q1,CY	Q2,CY	Q3,CY	Q4,CY
C1: Customer Care	10	2	1	4	3
C2: Applications to Progression	5	1	1	1	2
C3: Course Related	20	7	3	8	2
C4: Services	8	2	1	3	2
C5: Facilities	19	6	7	5	1
C6: Others	2	0	1	1	0
TOTAL	64	18	14	22	10



The category of ‘Customer Care’ received 13 complaints, the highest number of complaints in Q1. In 2022-23 only 10 complaints were received in this category for the whole year. The subcategories identified that 8 complaints related to ‘Staff Conduct’ and covered both curriculum teams and professional services. These came from a mix of FE students (4 complaints), HE students and Members of Public (2 complaints each). 7 complainants expressed concerns about the way they were spoken to by members of staff, and 1 related to sharing of a private email by a staff member. The remaining complaints concerned student conduct, insufficient wellbeing advice being provided and potential mistreatment of a student with autism.

The category of ‘Course Related’ received 9 complaints, 2 more than in Q1 last year. 5 concerned the impact of ASOS, 1 was due to delayed in receiving a certificate, 1 related to a presentation on gender-based violence, 1 concerned a lack of support on their course and 1 related to a perceived poor response by UHI to the Scottish Government decision to withdraw funding for a course. The latter was submitted by an MSP on behalf of a constituent.

The category of ‘Services’ received 2 complaints, the category of ‘Applications to Progress’ received 1 complaint and no complaints were received for ‘Facilities’ or ‘Other’.

In relation to the level of delivery in Q1, 36% of complaints relate to HE programmes, 36% to FE programmes, 24% of complaints came from members of the public and 4% from 'Other'.

Of the 9 HE complaints received, 2 related to the impact of ASOS and 2 related to staff conduct. The remaining complaints concerned a lack of employment advice, too many Bothy notifications, confusion around EO redundancies and the impact on UHI Inverness, insufficient wellbeing support and one regarding student behaviour.

Of the 9 FE complaints received, 4 complaints involved staff conduct, with the remainder expressing concerns resulting from ASOS, certification issues, a lack of additional support, issues with the content of a course presentation and problems with a funding application.

6 complaints were received from members of public, 2 related to ASOS, the remainder were a concern over anti-social behaviour, perceived racist comments on social media, a parent concerned about the lack of support for their child and withdrawal of a course due to Scottish Funding cuts.

There was a single 'Other' complaint concerning the mistreatment of a student with Autism.

Complaint Outcomes

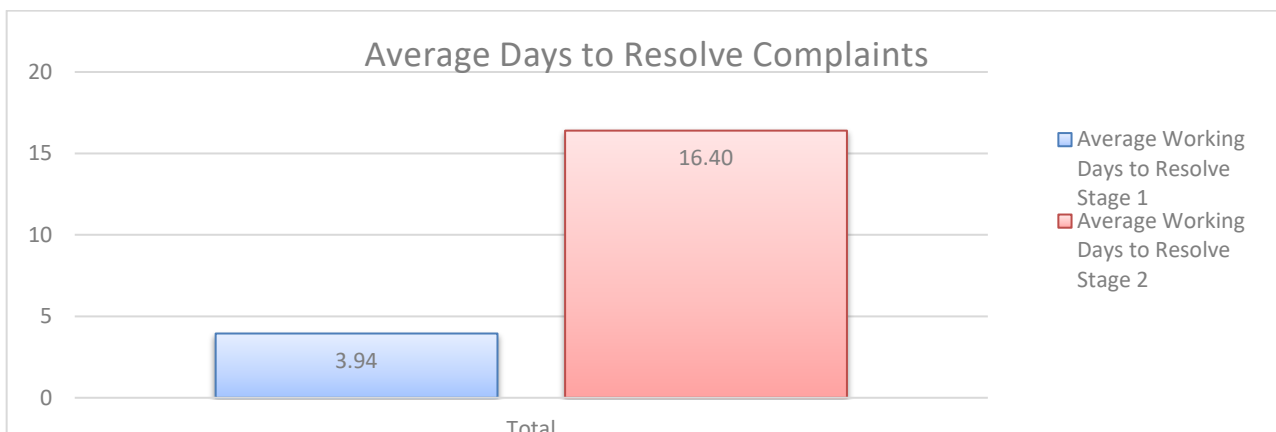
The graph below details the complaint outcomes.

Outcome	Stage 1	Stage 2	Total
Resolved	11 (58% of Stage 1)	0	11 (44% of Stage 1 & 2)
Not upheld	2 (10.5% of Stage 1)	0	2 (8% of Stage 1 & 2)
Partially upheld	2 (10.5% of Stage 1)	2 (33% of Stage 2)	4 (16% of Stage 1 & 2)
Upheld	2 (10.5% of Stage 1)	3 (50% of Stage 2)	5 (20% of Stage 1 & 2)
Still under investigation	0	1 (17% of Stage 2)	1 (4% of Stage 1 & 2)
Not Investigated	1 (5% of Stage 1)	0	1 (4% of Stage 1 & 2)
Withdrawn	0	0	0
Escalated to Stage 2	1 (5% of Stage 1)		1 (4% of Stage 1 & 2)

- 44% of all complaints received in Q1 were Resolved, compared to 33% in Q1 last year.
- 8% of all complaints were not upheld, compared to 5.5% in Q1 last year
- 16% of complaints have been partially upheld compared to 22.2% in Q1 last year
- 20% of complaints were upheld compared to 33% in Q1 last year.

- 1 complaint was not investigated as the response issued was the standard ASOS response agreed with EMT.
- 1 complaint was escalated to stage 2, the outcome was upheld, equating to 100% of the escalated complaints.

Complaint Timescales



The chart above displays the average number of days taken to resolve complaints in this quarter.

The range of days taken to resolve Stage 1 complaints in Q1 is between 1 – 10 days. The range of days taken to resolve Stage 2 complaints in Q2 is between 6 – 21 days.

SPSO guidelines state pre-defined timescales of a 5 working day turnaround for Stage 1, which can be extended to 10 working days if additional time is required but does not warrant escalating to a Stage 2. These extensions must be authorised by the Quality Manager and updates provided to the complainant. For a Stage 2 complaint the timeframe for completion is 20 working days. As part of the Stage 2 process, where the complaint is complex and may take longer than 20 working days, this must be authorised by the Quality Manager and updates provided to complainants.

15 complaints were completed within the 5 day turnaround for a Stage 1 complaint, this equates to 79% of all Stage 1 complaints. Four Stage 1 complaints (21% of Stage 1 complaints) required an authorised extension, and all were completed within 10 days.

Four Stage 2 complaints (67%) were completed within the 20 day deadline, one Stage 2 of complaint (16.6%) exceeded the 20 day timeframe by a single day. And one Stage 2 complaint (16.6%) is still under investigation.

The single escalated complaint was resolved within 18 days of being escalated to Stage 2.

Complaint Follow Up Survey

Within 6 weeks of receiving the complaint outcome, complainants (unless the complaint was received anonymously) are sent a link to a short survey asking them for feedback on their experience of the complaints process and to rate their satisfaction levels against

thirteen aspects of the process. The survey is anonymous unless the complainant chooses to identify themselves.

No responses were received in Q1.

Learning from Complaints

Complaints often result in reviews of processes and procedures, and they also allow us to identify opportunities for staff development. The Quality team continues to identify any learning points from each complaint in order to identify themes emerging. Programme and support teams use complaints as part of their evidence bank to inform their evaluative activities aimed at improving the student experience.

Below are examples of actions taken as a result of complaints received in Q1:

- The Bothy is to provide guidance on how to turn notifications off. The complainant has been put in touch with the learning technologist to resolve the issue.
- Summary findings from a complaint outcome are to be added to the agenda for NC Art & Design CCM.
- Meeting undertaken between complainant and funding team to explain application process and resolve complaint.
- A class were reminded of the Student Code of Conduct by their lecturer and the consequences of breaching it.
- Lecturer and PDA spoke with the class to reinforce the National Care Standards around confidentiality and made aware of Student Code of Conduct.
- Student disciplinary informal stage implemented as a result of a complaint.