Motherwell College

Annual Report to the Board of Management and the Auditor General for Scotland 2010/11

December 2011

Scott-Moncrieff

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Executive Summary

Finance

Our audit of Motherwell College is complete and our audit opinions on the truth and fairness of the financial statements and the regularity of transactions are unqualified.

Motherwell College owns 100% of the share capital of Amcol Scotland Limited, therefore all figures referred to in this report relate to the consolidated position for the group (College and Company).

The Consolidated Income and Expenditure Account reports a surplus of £889,000 in 2010/11. The budgeted surplus shown on the 2010 Financial Forecast Return submitted to the Scottish Funding Council was £985,000. The negative variance of £96,000 was mainly due to a reduction in ESF income received in the year, an improvement in the budgeted results of the College's subsidiary (Amcol Scotland Limited) and additional grant funding received.

The 2011 Financial Forecast Return shows the College forecasting operating surpluses of £720,000 in 2011/12.

The College is financially secure and the Group balance sheet as at 31 July 2011 reports net assets of £69.243m including bank and cash of £13.711m.

Governance

The College's Corporate Governance Statement confirms that the College has been fully compliant with the key principles of the UK Corporate Governance Code during 2010/11. We have reviewed the College's statement and can confirm that this is in line with the Scottish Funding Council's guidance and is not inconsistent with our understanding of the College's governance arrangements based on the information gathered as part of our normal audit work.

We did not identify any areas of concern from our review of the College's corporate governance arrangements in so far as they relate to prevention and detection of fraud and irregularity, or standards of conduct and prevention and detection of corruption.

Conclusion

This report concludes the 2010/11 audit of Motherwell College. We have performed our audit in accordance with the Code of Audit Practice published by Audit Scotland, International Standards on Auditing (UK and Ireland) and Ethical Standards.

This report has been discussed and agreed with the Associate Director of Finance. We would like to thank all members of the College's management and staff who have been involved in our work for their co-operation and assistance during our audit.

Scott-Moncrieff
8 December 2011

Introduction

1. This report gives a summary of the findings from our 2010/11 audit of Motherwell College ("the College"). The scope of our audit was set out in our External Audit Strategy and Plan which was presented to the Audit Committee on 27 September 2011. Our audit has focused on the financial statements and governance arrangements at the College.

2. Our plan summarised the following key audit issue for 2010/11:
   - Voluntary severance agreements.

3. This report sets out our findings in relation to this key issue and also includes a follow-up of issues identified in our previous annual reports.

4. The report is also addressed to the Auditor General for Scotland and will be published on Audit Scotland's website, www.audit-scotland.gov.uk.

Finance

5. This section of the report summarises our findings in relation to the College's financial performance for the year and its position at 31 July 2011. We also discuss any significant issues identified during our audit.

6. It is the responsibility of the College to conduct its financial affairs in a proper manner. It is our responsibility to audit the financial statements and to consider the College's governance arrangements in relation to the College's financial position.

Auditors' opinion

7. We are required to give an opinion as to whether the financial statements present a true and fair view of the financial position of the College as at 31 July 2011 and of its expenditure and income for the financial year. We are also required to include a regularity assertion in our independent auditors' report stating whether, in all material respects, expenditure and income were incurred or applied for their intended purposes and in accordance with guidance issued by the Scottish Ministers and the financial memorandum with the Scottish Funding Council (SFC).

8. Our audit is now complete and we have issued unqualified audit opinions on the truth and fairness of the accounts and on the regularity of transactions.

9. The signed financial statements will now be submitted to Audit Scotland, who will pass them to the Scottish Government for laying before the Scottish Parliament.

Financial position

10. The Consolidated Financial Statements report a surplus for the year to 31 July 2011 of £889,000.

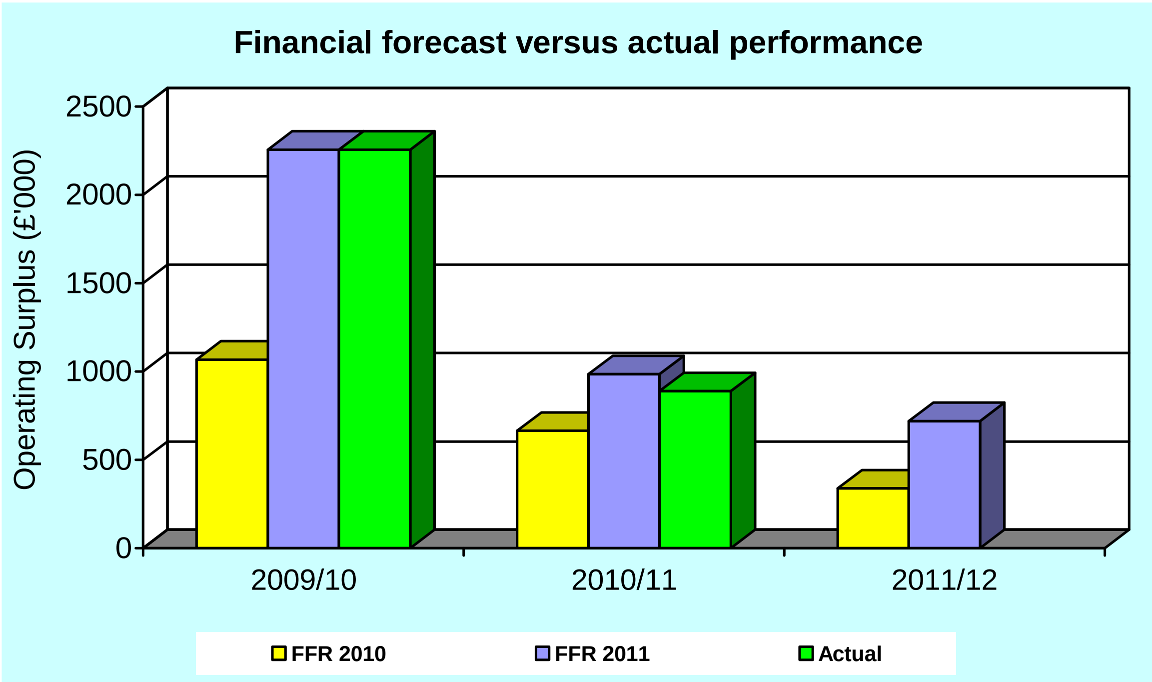
11. The Group's Balance Sheet as at 31 July 2011 is reporting total reserves of £23.097 million, with £24.326 million within the income and expenditure account and a cash balance of £13.711 million.

Financial forecasts

12. The College has returned the 2011 Financial Forecast Return (FFR) to the Scottish Funding Council (SFC). SFC uses the FFR to assess the financial position and performance of individual colleges and the sector as a whole. SFC has confirmed funding for 2011/12, but, unlike previous years, the College has not been asked to provide three year projections given uncertainty over the financial position of the sector as a whole. The result has been that the College has not been able to budget in the same level of detail as before beyond 2011/12. Instead, scenario planning has been undertaken to model the impacts of various funding settlements. Given the College's recent financial performance and strong balance sheet this is not expected to pose a major risk in the

short term, however the College should seek to formalise its medium term plans as soon as it receives clarity on funding from SFC.

13. The following graph compares the actual results for 2010/11 with the FFR forecasts and sets out future projections as contained within the 2011 FFR.



14. As shown above, the College is expecting to report a surplus in 2011/12.

15. The College's original budget for 2010/11 per the 2011 Financial Forecast Return (FFR) showed a surplus of £985,000. A reconciliation between the forecast surplus and the actual surplus is set out below:

	£
Surplus per initial budget	**985,000**
Variance in budgeted results of the subsidiary **(paragraph 16)**	113,000
Reduction in ESF income **(paragraph 17)**	(380,000)
Additional Economic Downturn funding received **(paragraph 18)**	274,000
Reduction in SAAS fees **(paragraph 19)**	(113,000)
Miscellaneous items	10,000
Actual surplus per financial statements	**889,000**
Variance from original budget	**(96,000)**
Variance as percentage of total income	**(0.3%)**

16. The College owns 100% of the share capital of the nursery, Amcol Scotland Limited. At the time the FFR was prepared, it was expected that the subsidiary would generate a surplus of £148,000. The subsidiary's actual surplus for the year was £261,000.

17. The College had budgeted to receive a full year of CPP funding, but only received a nominal £3k. North Lanarkshire Council advised that this project may have been double funded and therefore the College provided in full for this possible outcome.

18. Following the reduction in recurrent grants and fee waiver income in 2010/11, the College received additional economic downturn funding beyond the budgeted amount.

19. Due to the current economic climate, there is reduced funding available for students. This was exacerbated by a lower than budgeted student intake and higher than anticipated withdrawals.

Financial planning and monitoring arrangements

20. As part of our audit, we considered the College's financial standing, including the arrangements in place for financial planning, budgetary control and financial reporting. It is important that such arrangements are adequate in order to properly control the College's operations and use of resources.

21. The College has a rigorous and prudent budgeting process, which is directly linked to the annual curriculum planning process. Performance monitoring and forecasting processes are in place to ensure that available funds remain appropriately directed and controlled.

22. Budgets are devised in advance of the year and approved by the Board of Management, after consideration by the Finance Committee, and forecasts are updated during the year to take account of new information. The Finance Committee meets twice a year, and management accounts showing forecast year end positions against budget are presented to each Finance Committee meeting. In addition, management accounts are circulated monthly to members of the Finance Committee.

23. In our opinion the College has effective financial management arrangements in place, and has taken steps to proactively analyse and respond to the future funding challenges posed by the current economic climate.

Financial reporting framework

24. The principal elements of the College's financial reporting framework are:
    - Accounts Direction issued by the Scottish Funding Council
    - Further Education / Higher Education Statement of Recommended Practice (FE/HE SORP) 2007

25. We are pleased to confirm that the College's 2010/11 financial statements comply fully with the Accounts Direction and FE/HE SORP 2007 in all material aspects.

Financial statements preparation

26. We are grateful to the Associate Director of Finance and to the finance staff for their assistance and support during the course of the audit.

27. In relation to available resources within the Finance Department, this has been a challenging year for the College following the departure of the Director of Finance in March 2011, the Assistant Financial Controller being on maternity leave, and the Credit Controller position being unfilled for a lengthy period of time. We understand that the College is addressing the resource issue in order to ensure that the College's financial management and reporting needs are met.

Audit adjustments

Actual adjustments

28. During the course of the audit the following adjustments to the financial statements were identified:-

1	Dr Exceptional staff costs	£285,000	
	Cr Wages and salaries		£285,000
	Being the reallocation of the phase 2 voluntary severance costs to exceptional staff costs		
2	Dr Accruals	£25,425	
	Cr Prepayments		£25,425
	Being the correction to accruals and prepayments as a result of an invoice incorrectly posted in the year		
3	Dr Accrued income	£862,774	
	Cr Deferred income		£862,774
	Being reallocation of accrued income to deferred income		
4	Dr Cash at Bank and in hand	£457,142	
	Cr Accruals and deferred income		£457,142
	Being the inclusion of the bursary and hardship funds as at the year-end – Note it was the College's intention to transfer these funds on completion of the student funds audits		

29. None of these adjustments impacted on the college's surplus for the year.

30. All other adjustments related to presentational and disclosure issues.

Potential adjustments

31. Eight potential adjustments were noted as a result of the audit work performed, but have not been adjusted in the financial statements:-

1	Dr Trade Debtors	£29,441	
	Cr Trade Creditors		£29,441
	Being the grossing up of debit balances within the aged creditors listing		
2	Dr Trade Debtors	£127,152	
	Cr Trade Creditors		£127,152
	Being the grossing up of credit balances within the aged debtors listing		
3	Dr Trade Debtors	£20,583	
	Cr Deferred Income		£20,583
	Being amount of cash collected in advance reallocated to deferred income		
4	Dr Accruals	£37,117	
	Cr Exceptional staff costs		£37,117
	Being the over accrual of costs for phase 2 of the voluntary severance scheme		
5	Dr Accrued income	£17,612	
	Cr ESF income		£17,612
	Being under provision of ESF accrued income		
6	Dr ESF income	175,794	
	Cr Deferred income		175,794
	Being adjustment to include a claw-back of ESF income in respect of 2008-09		
7	Dr Prepayments	163,200	
	Dr Lease expense	6,800	
	Cr Land and buildings		170,000
	Dr Accumulated depreciation	4,533	
	Cr Depreciation		4,533
	Dr Deferred capital grant release	4,533	
	Cr Deferred capital grant		4,533
	Being reversal of capitalisation of Ravenscraig Sports Facility lease payment and reversal of associated depreciation and deferred capital grant release – Note College did seek independent professional advice on this matter of capitalisation and amortisation over the length of the lease		
8	Dr Accruals	£124,228	
	Cr Purchases		£124,228
	Being extrapolated error from purchase order accrual testing – (Follow-up of previous external audit recommendations – point 1)		

Affect on Consolidated I&E account of the above noted potential adjustments – decrease in surplus of £3,637.

Review of accounting systems

32. During our audit work we have considered the College's accounting systems and internal controls. Please refer to the action plan for details of control improvements detected during audit fieldwork. In general, the College's systems of internal financial control appear to be adequate, well designed and operating effectively.

Other issues of particular significance for the 2010/11 audit

33. In order to assist College members' understanding of the financial statements and our audit, we have summarised issues below which we believe are of particular significance to the 2010/11 financial statements, which have not already been discussed fully in our report.

Voluntary Severance Agreements

34. Our audit planning identified the accuracy and classification of costs associated with the voluntary severance agreements entered into in the year as a significant audit area. As a result of our audit testing, it was concluded that the amounts had been correctly included (*see potential adjustment 4 – paragraph 31*) and disclosed in the financial statements.

Pension Fund liabilities

35. The College's employees belong to two principal defined benefit pension schemes, the Scottish Teachers' Superannuation Scheme (STSS) and the Strathclyde Pension Fund (SPF).

36. The STSS is a multi-employer, notionally funded scheme and the College is unable to identify its share of the underlying assets and liabilities of the scheme. In line with Financial Reporting Standard 17 – *Retirement Benefits* (FRS 17), the College does not recognise any asset or liability relating to the STSS and the scheme is effectively accounted for as if it was a defined contribution scheme.

37. The SPF is also a multi-employer scheme, but the College can identify its share of underlying assets and liabilities and has therefore recognised a net liability in its balance sheet. In 2010/11, the College reported a liability in respect of the SPF of £1.232m. This was a significant reduction from the balance as at 31 July 2010 of £2.166m.

38. In 2009/10, there was also a one-off pension adjustment of £954k in favour of the College, which was reflected in the Income and Expenditure Account. This transaction was required because on 22 June 2010 the Chancellor of the Exchequer's Budget Statement confirmed that future pension increases were to be linked to the Consumer Prices Index (CPI) rather than Retail Prices Index (RPI).

39. We reviewed the College's accounting for the pension liability and confirmed that it complies with the requirements of FRS 17 and the FE/HE SORP, and that disclosure is consistent with the actuarial valuation report.

Governance

40. It is the College's responsibility to ensure that it has adequate governance arrangements in place. It is our responsibility to review and report on these arrangements as they relate to:
    - the College's review of its systems of internal control, including reporting arrangements;
    - the prevention and detection of fraud and other irregularities;
    - standards of conduct and arrangements for the prevention and detection of corruption;
    - the College's financial position.

41. We reported on the corporate governance arrangements in relation to its financial position in the Finance section of this report. This section includes our comments on other aspects of the College's arrangements.

Corporate Governance

Current governance arrangements

42. Colleges are required to include in their financial statements a statement covering the responsibilities of their Board of Management in relation to corporate governance arrangements. The statement should describe the ways in which the College has complied with good practice in corporate governance, including the arrangements for risk management, and report on the College's compliance with the UK Corporate Governance Code

43. The College's Corporate Governance Statement for 2010/11 states that the College was fully compliant with the UK Corporate Governance Code throughout the period.

44. We reviewed the Corporate Governance Statement by:
    - checking the statement against Scottish Funding Council guidance;
    - considering the adequacy of the process put in place by the Principal and Board of Management to obtain assurances on systems of internal control;
    - assessing whether disclosures in the statement are consistent with our knowledge of the College.

45. We are satisfied that the statement is consistent with the Scottish Funding Council's guidance and that the contents are not inconsistent with information gathered during the course of our normal audit work.

Risk management

46. Risk management is important to the establishment and regular review of systems of internal control. The College's annual accounts outline the principal risks and uncertainties of the College and confirm that mitigating controls are in place in response to these risks.

47. The College has a Risk Management Policy and Risk Management Procedures in place. The College has a risk register which is maintained by the Senior Executive Team (SET) and reviewed and updated on an annual basis. The Audit Committee and Board of Management will review the risk register annually. However any significant changes in the risk register are notified immediately to both the audit committee and the full board.

48. We have concluded that the College has robust risk management systems in place.

Internal audit

49. Internal audit is a key component of the College's corporate governance arrangements. The College's internal audit service is provided by Deloitte.

50. To avoid duplication of effort and ensure an efficient audit process, we have made use of internal audit work where appropriate.

Internal audit's annual opinion statement

51. Internal audit has concluded in its annual report that management has an adequate framework of control over the systems examined.

52. We are grateful to Deloitte for their assistance during the course of our audit work.

Prevention and detection of fraud and irregularity

53. As part of our audit we consider how the College ensures compliance with all relevant guidance and regulations. This includes a consideration of the College's arrangements for the prevention and detection of fraud and irregularity.

54. The College has a fraud and corruption policy and a code of practice on whistle blowing in place. There were no frauds identified during the year.

55. All SFC and other guidance and circulars are received by the Executive Assistant to the Principal. All relevant regulatory information is distributed to the appropriate members of staff. A database is held of all SFC circulars and responsible officers. All relevant guidance is presented to the Board of Management meetings ensuring that all those concerned have access to adequate and relevant information.

56. We identified no issues of concern in relation to the arrangements for the prevention and detection of fraud, with regard to the legality of transactions or in relation to compliance with relevant guidance and regulations.

Standards of conduct

57. We are required to consider the arrangements made by management in relation to standards of conduct and prevention and detection of corruption.

58. Propriety requires that public business is conducted with fairness and integrity. This includes avoiding personal gain from public business, being even-handed in the appointment of staff, letting contracts based on open competition and avoiding waste and extravagance. Guidance on standards of conduct, accountability and openness has been issued by the Scottish Government.

59. Our work in this area included a review of the arrangements for adopting and reviewing standing orders, financial instructions, registers of interest and schemes of delegation and complying with national and local Codes of Conduct. We also considered controls over ordering and procurement and disposal of assets.

60. We are pleased to report that our audit identified no issues of concern in this area.

Looking Forward

Financial position

61. There is increasing uncertainty over the level of future funding that will be provided to the sector. Indications from the Scottish Government are that the reductions in funding experienced in 2010/11 is a trend which is expected to be reflected in funding settlements over the next few years. Coupled with increasing cost pressures this will result in significant financial challenges for the College and the sector as a whole.

62. SFC has confirmed funding for 2011/12, but, unlike previous years, the College has not been asked to provide three year FFR projections given uncertainty over the financial position of the FE and public sector as a whole. This puts pressure on the College's ability to plan its medium term financial future. It is undoubtedly a significant variable which complicates strategic decision making. However, the history of strong financial performance has shown that the College operates on a firm financial footing and it is well placed to meet these future financial challenges when compared to many other FE bodies.

International financial reporting standards

63. The College's financial statements are still prepared on the basis of UK accounting standards (UK GAAP) which the Statement of Recommended Practice: Accounting for Further and Higher Education (SORP) Board believes continues to be appropriate for Colleges.

64. Colleges will continue to converge with international financial reporting standards (IFRS) as UK GAAP converges with IFRS. It appears likely that full implementation of IFRS will not take place before 2013/14.

65. The conversion process requires sufficient and appropriate information to be available to support the production of comparator balances. Effectively, this means work to produce full IFRS-compliant financial statements will begin at least one year before the actual implementation date. In some areas, such as in relation to fixed assets and component accounting, the earlier the work begins the more straightforward the conversion process may be and we endorse any moves the College may make to work towards IFRS transition in a structured and well-planned way.

Appendix 1 – Action Plan

Our annual report action plan details the financial control weaknesses and opportunities for improvement that we have identified during our audit visit in addition to any reportable matters arising from our review of performance and governance systems.

The action plan details the officers responsible for implementing the recommendations and implementation dates. The College should assess these recommendations for their wider implications before approving the action plan. Following submission of this report to the Audit Committee, we will send a copy to the Auditor General.

It should be noted that the weaknesses identified in this report are only those that have come to our attention during the course of our normal audit work. The audit cannot be expected to detect all errors, weaknesses or opportunities for improvements in management arrangements that may exist.

Grading

To assist the College in assessing the significance of the issues raised and prioritising the action required to address them, the recommendations have been graded. The grading structure is summarised as follows:

Grade 5	Very high risk exposure – Major concerns requiring Board attention.
Grade 4	High risk exposure – Material observations requiring management attention.
Grade 3	Moderate risk exposure – Significant observations requiring management attention.
Grade 2	Limited risk exposure – Minor observations requiring management attention.
Grade 1	Efficiency / housekeeping point.

Issues arising from our 2010/11 audit

Action point	Issue identified and recommendation	Management response
1 **Purchases cut off**	During our purchases testing, it was noted that an invoice which was dated July 2011 was posted into year end 2012 and therefore not included in the year end 31 July 2011 financial statements. There is a risk that the creditors, VAT and purchases balances in the financial statements are understated. We recommend that all invoices are posted to the nominal ledger according to the date on the invoice. This should ensure that all invoices are posted to the correct period. **Grade 2**	A high volume of invoices are received during the months of June and July, and this invoice slipped through. Accepted. **To be actioned by:** Assistant Financial Controller & Management Accountant **No later than:** January 2012
2 **Level of bad debts**	During our testing of debtors, it was noted that the level of older debts has increased significantly in the year from £93k to £408k. We appreciate from finance staff that this is mainly due to international student debt which is very difficult to recover if the students have absconded. There is a risk that these debts are not recoverable and will have to be written off in the future by the College. We recommend that debts are chased as soon as they become due and that the policy for payment of student fees in advance be reconsidered, to reduce debt exposure. **Grade 3**	The College has addressed the issue of collection of fees, reinstating the policy to charge overseas students fully in advance, rather than the deposit system which was in operation. It should also be noted that the Credit Controller and their Line Manager were absent for lengthy periods of time during 2010/11. **To be actioned by:** Assistant Financial Controller & Credit Controller **No later than:** Immediate effect

Action point	Issue identified and recommendation	Management response
3 **Reconciliation of income per management accounts to income disclosed in the VAT returns**	During the year, bank interest received totalling £173,053 and a CPP invoice for £123,750 were disclosed within box 6 of the VAT returns in error. These types of income are not VATable. There is a risk that incorrect figures are disclosed to HMRC and if there was a VAT visit, HMRC would question the amount of VAT paid given the level of income disclosed in the VAT return. We do recognise that HMRC have reviewed the system for recording VAT through the Lennartz claim and were happy with the system. We recommend that a reconciliation is performed quarterly, where income per the management accounts is reconciled to income disclosed within box 6 of the VAT returns, to ensure that such issues are identified on a timely basis. **Grade 1**	This is currently performed as part of the annual review of the partial exemption calculations, however the College agrees with the recommendation of quarterly reconciliations. **To be actioned by:** Assistant Financial Controller **No later than:** February 2012

Follow-up of previous external audit recommendations

Follow-up point	Original recommendation	Update at December 2011
1 **Commitment accounting** **2007/08 audit**	Part of the year end accrual figure is derived from outstanding purchase orders commitments. For many of the items selected for testing, goods and services had not been received by the 31 July 2008 and thus the accrual should have been reversed. The estimated over-statement of accruals totals approximately £273,100 (2007: £304,200). If adjusted the net effect on the 2008 accounts would have been a reduction in surplus of £31,100. We recommend that year end procedures are implemented to ensure that all purchase order accruals are reviewed to confirm whether or not goods and services have been received by the year end. Where this is not the case the accrual must be reversed. **Management Response:** The treatment of purchase order commitments is explicit in the College's financial policies and procedures. This treatment is consistent with that applied in previous accounting periods. The College endeavours to look at this area in advance of next year's audit. **Responsible Officer:** Assistant Financial Controller **Implementation Date**: July 2009	There were purchase order commitments totalling £174,943 at 31 July 2011 which were tested during the audit and the goods or services, for a sample of items tested, were found to not have been received by the year-end. Extrapolated across the population the net effect on the 2011 accounts would have been an increase in surplus of £124,228. **Management response:** This treatment is consistent with that applied in previous accounting periods. The College has tightened up in this area. In addition a mid-year exercise reviewing all outstanding and incomplete purchase orders took place as part of the implementation of the new e-procurement system. **To be actioned by:** Finance/Budget holders **No later than:** July 2012

Follow-up point	Original recommendation	Update at December 2011
2 **Bank reconciliation - capital investment account** **2009/10 audit**	During our bank testing, it was noted that in respect of the capital investment account, bank statements are not used during the preparation of the bank reconciliation. Interest received on this account is being posted to the accrued income code rather than to the appropriate bank account nominal code. There is a risk that the bank balance in the financial statements is misstated as the interest has not been included in the nominal ledger. We recommend that bank statements be used to prepare all bank reconciliations and this will result in the interest being posted to the bank nominal codes. **Responsible Officer:** Financial Controller/Cashier **Implementation Date:** November 2010	Issue addressed. **Action taken as agreed**
3 **Nominal Accounts** **2009/10 audit**	Within the nominal ledger there are certain balance sheet codes that include a mix of both debtor and creditor balances. For example the deferred income account includes accrued income balances which have been offset. This issue gave rise to potential adjustment 4 noted within paragraph 32 of the 2009/10 report, with a value of £539,777. We recommend that each class of debtor and creditor is allocated its own unique nominal code within the nominal ledger, as this will assist with the preparation of month end reconciliations and the year end accounts production process. **Responsible Officer:** Management Accountant **Implementation Date:** January/February 2011	This is still the case and an actual adjustment for £862,774 has been raised to gross up accrued income due to it being a material amount in respect of the 2010/11 financial statements. **Management response:** The coding structures will be reviewed as part of the implementation of the new systems. **To be actioned by:** Management Accountant **No later than:** January/February 2012

Follow-up point	Original recommendation	Update at December 2011
4 **Fixed Asset Register** **2009/10 audit**	Our audit planning identified the accuracy of the fixed asset register as a key audit area following the completion during the year of a component accounting exercise. Limited detailed asset information is held within the register in respect of fixtures, fittings, plant and equipment to assist College Management with the physical tracking of assets. We recommend that the information held within the register in respect of fixtures, fittings, plant and equipment is expanded, in order to aid the internal process of ensuring continued existence of assets. **Responsible Officer:** Financial Controller **Implementation Date:** July 2011	No further action has been taken by the College in respect of this issue. **Management response:** Management will consider this in light of having more detailed information available held by the Estates Manager. **To be actioned by:** Management Accountant **No later than:** July 2012
5 **Corporate Governance Code** **2009/10 audit**	The UK Corporate Governance Code, formerly known as the Combined Code, sets out standards of governance, against which publicly funded bodies are required to prepare a corporate governance statement. This replaces the 2008 Combined Code. To mitigate against the risk of non-compliance, we recommend that the College reviews its corporate governance arrangements against the new Code in preparation for making its Corporate Governance Statement in its 2010/11 financial statements. We have undertaken an analysis of the key changes applicable to education bodies and will be sharing this guidance with College management to help inform this assessment. **Responsible Officer:** SET **Implementation Date:** December 2010/January 2011	Issue addressed. **Action taken as agreed**

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