

Board of Management

Audit & Assurance Committee

Date of Meeting	3 March 2026
Paper No.	AAC3-E
Agenda Item	5.2.2
Subject of Paper	Internal Audit Report: Outreach
FOISA Status	Disclosable
Primary Contact	David Archibald, Henderson Loggie
Date of production	19 February 2025
Action	For Discussion

1. Recommendations

- 1.1. The Committee is asked to consider and discuss the report and the management responses to the Internal Audit Recommendations.

2. Consultation

- 2.1. The Lead Auditor has consulted with the Executive Owner, the College Lead, and the Compliance Auditor.

3. Key Insights

- 3.1. The Internal Audit for Outreach has identified one Priority 2 recommendation and five Priority 3 recommendation from the fieldwork, which have management responses.

4. Impact and Implications

4.1. Internal Audit provides an objective insight into the efficiency of operations, evaluation of risks, and organisational controls.

Appendix 1: Internal Audit Report – Outreach

City of Glasgow College

Outreach (including Lifelong Learning,
Community Engagement, ESOL and King's
Trust)

Internal Audit report No: 2026/02

Draft issued: 28 January 2026

Final issued: 19 February 2026



Contents

		Page
Section 1	Management Summary	
	• Overall Level of Assurance	1
	• Risk Assessment	1
	• Background	1-2
	• Scope, Objectives and Overall Findings	3
	• Audit Approach	3
	• Summary of Main Findings	4-5
	• Acknowledgements	5
Section 2	Main Findings and Action Plan	6 - 15

Level of Assurance

In addition to the grading of individual recommendations in the action plan, audit findings are assessed and graded on an overall basis to denote the level of assurance that can be taken from the report. Risk and materiality levels are considered in the assessment and grading process as well as the general quality of the procedures in place.

Gradings are defined as follows:

Good	System meets control objectives.
Satisfactory	System meets control objectives with some weaknesses present.
Requires improvement	System has weaknesses that could prevent it achieving control objectives.
Unacceptable	System cannot meet control objectives.

Action Grades

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



Management Summary

Overall Level of Assurance

Satisfactory

System meets control objectives with some weaknesses present.

Risk Assessment

This review focused on the controls in place to mitigate the following risks on the City of Glasgow College's Strategic Risk Register (as of November 2025):

- SR1 – Failure to support successful student outcomes and progression (Net score 10, amber)
- SR6 Negative impact upon the College's reputation (Net score 9, amber)
- SR12 – Negative impact of statutory compliance failure (Net score 10, amber)
- SR20 Failure to maximise income via diversification (Net score 12, amber)

Background

As part of the Internal Audit programme at City of Glasgow College for 2025/2026, we carried out a review of the systems in place for Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust). Our Audit Needs Assessment identified this as an area where risk can arise and where Internal Audit can assist in providing assurances to the Audit and Assurance Committee, and management, that the related control environment is operating effectively, ensuring risk is maintained at an acceptable level.

The Scottish Government's widening access strategy is underpinned by the principle that learners from the most deprived communities should have the same opportunity to enter higher education as those from the least deprived. This commitment was formalised through the *Commission on Widening Access* and its 2016 report, *A Blueprint for Fairness*. The national headline target is that by 2030, students from the 20% most deprived areas (SIMD20) will represent 20% of full-time, first-degree entrants to higher education. Interim milestones include 16% by 2021 (achieved) and 18% by 2026.

Colleges play a critical role in achieving these goals. They act as a key access route for disadvantaged learners through articulation agreements with universities, enabling progression from HNC/HND to degree programmes. Colleges also deliver outreach and community engagement initiatives, supporting care-experienced learners, students with disabilities, and those from SIMD20 postcodes. Approximately 46% of SIMD20 entrants to university progress via college pathways, highlighting the importance of Scottish colleges in widening participation.

While there are no separate statutory widening access targets for colleges, their contribution is monitored through Scottish Funding Council (SFC) Outcome Agreements, which include commitments on access, retention, and progression. Colleges report on metrics such as the proportion of SIMD20 students enrolled in higher education courses, care-experienced student participation, and successful outcomes.

Background (continued)

As Scotland's largest college, CoGC is expected to align its outreach activities with these national priorities, ensuring that learners from disadvantaged backgrounds are supported to access and succeed in further and higher education. It's guiding principle of Let Learning Flourish ensuring that it creates an inclusive environment where individual needs are prioritised and progression routes are clear for all learners. In its Strategy 2021-2030, the College identified its role in social mobility and societal impact (DEEPLIST section of the published Strategy). It also has set the following strategic aims:

- 2.1 Deliver sector leading student attainment for recognised qualification, and
- 2.3 Provide access and progression opportunities for all, through a broad, industry relevant curriculum for work and advanced study.

The College embeds widening access within its values and strategic priorities, focusing on equality, partnership, and innovation. Its objectives include targeted outreach, support for vulnerable groups, and collaboration with community partners to ensure inclusive participation. The outreach programme is led by the Curriculum Head for Widening Access & Community, supported by the COO and Deputy Principal. The College's Widening Access and Community Team deliver a wide range of outreach programmes to learners, working in partnership with organisations such as the King's Trust, Simon Community, Glasgow City Mission, Marie Trust, Maryhill and North Glasgow Integration Networks, Saheliya, Multiply, NHS Greater Glasgow and Clyde and the Nairn Trust.

The Scottish Government, Education Scotland, and the Scottish Funding Council (SFC) also recognise English for Speakers of Other Languages (ESOL) as a key driver for social inclusion, employability, and progression into further and higher education. Their shared aims include: improving access to high-quality ESOL provision; embedding language learning within community and vocational contexts; and ensuring learners can transition effectively into mainstream education or employment. National strategies emphasise flexible delivery models, partnership working, and targeted support for refugees, asylum seekers, and other vulnerable groups. The College also plays a pivotal role in meeting these objectives by offering a wide range of ESOL courses, collaborating with local integration networks and community organisations, and aligning its outreach programmes with regional and national priorities to remove barriers and promote lifelong learning opportunities.

The SFC allocates funding from the Scottish Government to colleges specifically to deliver ESOL provision, in line with the Adult ESOL Strategy for Scotland and New Scot Strategy. This includes both campus-based and community-based ESOL activity, often in partnership with local organisations. The Colleges receives this funding through their annual credit-based funding model and outcome agreement. The Associate Dean for ESOL and Communities, within the Education and Humanities Faculty, leads on ESOL delivery and community engagement initiatives.

While there is not a distinct lifelong learning programme, the College also offers flexible, industry-focused programmes designed to upskill and reskill individuals at all stages of life, alongside community-based initiatives designed to widen participation for those furthest from employment. Delivery is supported through partnerships with employers, local organisations, and regional networks, thus ensuring alignment with SFC priorities. Student demographics are monitored by the Admissions teams via Enquirer.

Scope, Objectives and Overall Findings

The scope of this audit was to consider the key risks in relation to the College's outreach programmes.

The table below notes each separate objective for this review and records the results:

Objective	Findings			
The specific objectives of the audit were to gain reasonable assurance that:	Level of Assurance	1	2	3
		No. of Agreed Actions		
1. Adequate controls are in place over the development of new outreach programmes including the preparation of a business case, costing and pricing.	Satisfactory	-	-	2
2. There is an appropriate process in place to identify funding sources and, where relevant, bid for funding. The sustainability of programmes is considered beyond the initial funding stream.	Satisfactory	-	-	2
3. The College has clear strategic aims with regard to outreach programme student recruitment and retention, and plans have been put in place to meet these aims.	Satisfactory	-	-	1
4. The setting of targeted outreach student numbers and, where relevant, Credits is robust and there is an adequate system in place for monitoring achievement against targets and reporting to senior management.				
5. Where relevant, the College ensures compliance with UKVI Student Route requirements regarding monitoring of outreach student engagement and attendance, with escalation processes in place to identify those students who have failed to meet attendance criteria.	Requires Improvement	-	1	-
Overall Level of Assurance	Satisfactory	-	1	5
		System meets control objectives.		

Audit Approach

As there is no dedicated programme for lifelong learning, this area was removed from the audit with the focus being on ESOL and Widening Access & Communities. Interviews were held with the Curriculum Head (CH) for Widening Access and Community, Dean of Humanities and Education, Associate Dean for Communities and ESOL, and the Associate Director Student Registration and Funding, to assist in documenting the systems and processes in place. A detailed assessment of the key internal controls was performed including the review of outreach programme planning, participant recruitment and retention.

Summary of Main Findings

Strengths

- For ESOL programmes, annual faculty portfolio reviews act as a structured self-assessment process, feeding directly into the Student Recruitment Plan (SRP) and ensuring curriculum adjustments and recruitment targets are evidence-based.
- New ESOL programmes are proposed using the same methodology as mainstream new course proposals, with business cases completed and reviewed through the Portfolio Review Process, the Faculty Board and Academic Board.
- ESOL and Widening Access & Community management are passionate and knowledgeable about their subject area, with ambitions to ensure programmes are sustainable for the College and learners.
- Widening Access & Community programmes are also tracked through the SRP, ensuring enrolments can be monitored.
- ESOL and Widening Access & Community programmes demonstrate flexibility to respond to emerging funding opportunities, with collaborative development involving community stakeholders and a clear business case process for new courses.
- The College has previously secured significant funding from reputable organisations (e.g., The King's Trust, Multiply, Nairn Family Trust) to deliver impactful programmes for care-experienced young people and community learners, with commendations for trauma-informed practice and quality delivery.
- Programmes such as Multiply initiatives are designed to embed practical skills into everyday contexts, making learning relevant and accessible while addressing social value, personal development, mental health and wellbeing, as well as potential progression of individuals into further education or employment.
- All external funding opportunities and their status are tracked centrally by the CH Widening Access & Community and the Dean of Humanities & Education.
- All ESOL, Widening Access & Community programme courses and attendance are tracked through the Enquirer system in line with college attendance monitoring and funding SFC requirements.
- Funder reports outline outcomes for Widening Access & Community programmes, with learner achievements for ESOL students tracked through curriculum performance management and portfolio review.

Weaknesses

- The College lacks a single document which clearly articulates the College's ambitions and objectives for ESOL, Widening Access and Community learning, such as within a sub-strategy for outreach.
- Faculty Portfolio Reviews completed in 2024 and 2025 assessed ESOL arrangements but did not include Widening Access & Community review – with only brief references made to arrangements and staff training. This could limit senior management insight into the effectiveness of these programmes (and the benefits they deliver for the community and the College), as well as any sustainability risks for management awareness.
- Widening Access & Community programmes depend on a mix of reactive and proactive efforts, with many opportunities sourced informally. The absence of a formal funding strategy and pipeline, combined with reliance on limited capacity within the Curriculum Head role and funding research tools (such as Grant Finder), may constrain the College's ability to secure a sustainable level of funding to deliver future aspirations.
- There is no dedicated web page or strong internal communication to showcase the College's Widening Access and Community ambitions. This could limit external engagement and internal awareness of the team's role in supporting inclusive, trauma-informed practices.
- No internal measures exist to define or evaluate the success of Widening Access and Community programmes in improving attainment for individuals excluded from traditional education and employment opportunities.

Summary of Main Findings (continued)

Weaknesses (continued)

- Balancing UKVI Student Route sponsorship with SFC-funded ESOL course eligibility remains a challenge. While the 2025/26 checks on UKVI student and residency status, for new and continuing ESOL students, have been completed, key gaps persist. So for example, there is no clear agreement on whether enhanced UKVI checks apply to all ESOL learners, roles and responsibilities for compliance are undefined, and ESOL staff lack training in conducting eligibility checks. Additionally, no process exists for ongoing monitoring of student visa status. We were advised that a meeting was convened in December 2025 to agree compliance processes and assign responsibilities.

Acknowledgments

We would like to take this opportunity to thank the staff at City of Glasgow College who helped us during the course of our review.

Main Findings and Action Plan

Objective 1 - Adequate controls are in place over the development of new outreach programmes including the preparation of a business case, costing and pricing.

The annual faculty portfolio review acts as self-assessment process, which is utilised to evaluate which courses and units are performing well and which are not. This informs curriculum adjustments and recruitment targets for the following academic year. Outcomes feed into the Student Recruitment Plan (SRP), with recruitment formally monitored by the Registration & Funding team. This includes the review of ESOL programmes. Staff use the “*New Course Proposal: Early Notification Form*”, which is available on the MyConnect intranet, as a business case for new courses. The form outlines the course rationale, target market, anticipated student intake, and indicative content. Proposals are submitted to the Associate Dean/Dean before Portfolio Review, where additional details such as staffing, costs, and potential funding routes are considered and documented.

The 2025/26 SRP for ESOL and Widening Access and Community programmes listed 153 courses, supporting approximately 1,600 ESOL students and 920 Widening Access and Community students. This equated to around 29,000 lecturing hours and 17,630 credits.

Since 2024/25 academic year, the College has introduced new full-time programmes such as “*ESOL Into...*” courses, which are designed to retain learners and support progression into employment. Credit-bearing examples already underway include *ESOL into Care* and *ESOL into Business & Enterprise*, with further programmes under consideration, such as *ESOL into Teaching*, to combat the challenges experienced of recruiting into the advanced levels ESOL. Looking ahead to 2026/27, the faculty is also piloting a new ESOL teaching qualification, Trinity CertTESOL (Certificate in Teaching English to Speakers of Other Languages). The proposal was agreed during the 2025 portfolio review, overseen by the College Principal. The business case, including 2–3-year projections, is scheduled for Faculty Board review in December 2025, with final approval by the Academic Board in early 2026. If approved, targets will be incorporated into the 2026/27 SRP. In both cases, the business cases were completed. We were also able to trace the governance and approval of the *ESOL into Business and Enterprises* through the 2024 Portfolio Review process.

The Widening Access & Community programmes are tracked on both the SRP and Enquirer systems. The offering is designed to be flexible and is reviewed annually, incorporating feedback from external stakeholders. As a result, the new course approval process differs from standard procedures, as it must accommodate this flexibility. New opportunities are developed collaboratively by CH Widening Access & Community in partnership with community stakeholders and charities and reviewed by the Dean of Humanities and Education and/ or Associate Dean Communities & ESOL. These initiatives typically rely on securing external funding through the funder's application process.

Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 1 - Adequate controls are in place over the development of new outreach programmes including the preparation of a business case, costing and pricing.

An exception to this model is contracted work, such as the 10-year agreement for mental health training provision within the Scottish Prison Service. This contract, valued at approximately £50,000 annually, was secured through a partnership with the College's Commercial Team via Public Procurement Scotland.

We recognise that the approval processes for new mainstream and ESOL courses differ from those for Widening Access & Community programmes. This distinction reflects the need for these programmes to remain agile and responsive to emerging funding opportunities, which could be hindered by traditional approval routes through the Faculty Board and Academic Board. Consequently, there is a strong reliance on the CH Widening Access & Community and the Faculty of Humanities & Education management team to ensure that all programmes remain aligned with the College's strategic objectives.

Our review of the College's strategic aims for outreach programmes, including ESOL and Widening Access & Community learning, however, noted the following observation:

Observation	Risk	Recommendation	Management Response
Our review of the College's Strategy 2021–2030, and its sub-strategies, found no clear articulation of ambitions for ESOL, widening access or community engagement. Consequently, objectives for ESOL, Widening Access and Community learning are not formally documented in one place. For example, targets for potential growth, income diversification, and community impact and social value. In practice, ESOL provision is largely managed through waiting lists, with capacity constrained by staff availability and reliance on additional Scottish Government funding to expand delivery. Community learning programmes are shaped by short-term funding streams, leaving the overall approach to planning and delivery largely reactive.	The College's limits its ability to provide sustainable access and progression opportunities for all, such as vulnerable young people and adults.	R1 - The College should establish clear standards for its outreach programmes by developing a medium- to long-term strategy that sets out its ambitions for ESOL, widening access and community learning over the medium to longer term. This should outline the programmes required to achieve those goals, including social benefits and income diversification, and include a structured approach to partnership engagement and funding (see R3).	The team currently secure grants proactively through contacts and memberships, however this is not fully documented. Therefore, a short- and long-term funding strategy will be documented and will be supported by the Scottish IKE and Innovation team, whilst utilising the grant funding tool to understand further grant opportunities. To be actioned by: CH Widening Access & Community No later than: 30 August 2026
			Grade 3

Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 1 - Adequate controls are in place over the development of new outreach programmes including the preparation of a business case, costing and pricing.

Observation	Risk	Recommendation	Management Response
While the 2024 and 2025 Portfolio Reviews assessed ESOL outcomes, they did not report specifically on widening access and communities' programme, limiting senior management insight into: their effectiveness; any risks to the longer-term sustainability of programmes; and reducing opportunities to integrate these widening access initiatives with the mainstream curriculum.	Community programmes opportunities may be underutilised impacting on the effectiveness to which the College could meet widening access and inclusion, as well as income diversification objectives.	R2 – Consideration should be given to reporting Widening Access and Community programme outcomes as part of the annual Faculty Portfolio Review, with risks and opportunities required to strengthen internal partnership working defined, and describing the innovation and flexible credit options required to meet overall credit targets and deliver social value. Any risks associated with the success of communities and outreach access programmes should also be reported to support strategic planning and delivery.	The Self Evaluation Plan for the faculty will be updated to highlight the actions of the Widening Access and Community Programme. This then feeds into the annual portfolio review process. To be actioned by: AD ESOL & Communities No later than: 30 September 2026
			Grade 3



Objective 2 - There is an appropriate process in place to identify funding sources and, where relevant, bid for funding. The sustainability of programmes is considered beyond the initial funding stream.

ESOL is recognised as a national policy priority under the Adult ESOL Strategy for Scotland and the New Scots Strategy. The Scottish Government provides additional ring-fenced funding to expand ESOL provision, such as the £500,000 awarded for the Glasgow ESOL Partnership to reduce waiting lists (May 2025). Funding provision is made via the SFC.

For Widening Access and Community programmes, funding opportunities are core to teaching provision. Over the last 24 months, funding awards to the College have included:

- The King's Trust-funded Team Programmes over 2024/25, supported by The Promise funding, provided the College with £30,000 to deliver three enhanced programmes. Each programme was designed to guide care-experienced young people through a structured personal development journey. The funding also supported the involvement of social work placement students who provided valuable 1:1 advocacy, mentoring, and guidance throughout the programme, including holiday periods when the college support services are closed. The King's Trust commended the College for the quality of delivery, highlighting the strength of our trauma-informed practice and the depth of support provided to young people.
- Multiply funding of £90,040 over 2024/25. This programme provided numeracy learnings into everyday activities such as budgeting for meals, measuring fabric for sewing, and applying numeracy in mental health and wellbeing. This approach aimed to make maths more relevant and accessible to learners, ensuring they could directly apply these skills to their lives. The programme completed in May 2025.
- The Nairn Family Trust awarded £32,000 for a Personal Development Programme designed to support care-experienced young people who have had negative experiences of education or who, for various reasons, have not fully engaged in school. The programme has been running from May 2025 until March 2026 with an outcomes report provided to the funder in December 2025.

Income is also generated for the College through the Scottish Prison Service contract and placement of Social Work students provided by University of Strathclyde, University of Edinburgh, and University of the West of Scotland (UWS). While the income is utilised to resource class materials, the Social Work students play a vital role in supporting individuals in need, particularly as mainstream student services are not available to community based learners.

All income (and the status of applications) is tracked by the CH of Widening Access and Community on a tracker that is used to inform Faculty reporting by the Dean of Humanities & Education.

Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 2 - There is an appropriate process in place to identify funding sources and, where relevant, bid for funding. The sustainability of programmes is considered beyond the initial funding stream (continued).

Observation	Risk	Recommendation	Management Response		
The funding pipeline for Widening Access & Community programmes combines both reactive and proactive elements, with project implementation often influenced by the availability of funding opportunities and the capacity of the Curriculum Head of Widening Access & Community to identify and pursue them. Our discussions indicated that many funding opportunities have been sourced through informal channels, such as word of mouth, rather than through a structured and strategic approach.	Reliance on ad hoc funding and limited capacity to seek funding opportunities could lead to delays or inconsistent delivery of community and outreach programmes.	R3 - Management should establish a structured, forward-looking funding strategy / pipeline that prioritises sustainability and aligns with outreach strategic objectives and partnerships (see R1). This should include seeking internal resource (people and grant searching tools) to support the CH Widening Access & Community in seeking and applying for new funding opportunities. Grant finding learnings from other College areas, such as Scottish IKE and Innovation could be leveraged.	The team currently secure grants proactively through contacts and memberships, however this is not fully documented. Therefore, a short- and long-term funding strategy will be documented and will be supported by the Scottish IKE and Innovation team, whilst utilising the grant funding tool to understand further grant opportunities. To be actioned by: CH Widening Access & Community No later than: 30 August 2026		
			<table><tr><td>Grade</td><td>3</td></tr></table>	Grade	3
Grade	3				



Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 2 - There is an appropriate process in place to identify funding sources and, where relevant, bid for funding. The sustainability of programmes is considered beyond the initial funding stream (continued).

Observation	Risk	Recommendation	Management Response
There is currently no dedicated landing page for Widening Access and Community on the College's public website, which clearly communicates the College's ambitions in widening access and community-based learning. Such a page could form part of a wider external engagement strategy, providing stakeholders, the general public, and potential funders with a clear understanding of these priorities and including an enquiry form to facilitate queries regarding funding or partnership opportunities. In addition, there is a need to strengthen internal communication and raise the profile of the Widening Access and Community team, highlighting their role in supporting lecturers with trauma-informed learning and teaching strategies within mainstream education.	The College cannot maximise the opportunities brought by the skills and experiences of the Widening Access & Community Team in leveraging potential new income or internal innovation and partnerships.	R4 - Management should take steps to develop a clear communication and engagement strategy for Widening Access and Community, which meets both external and internal stakeholder needs. This should include the creation a dedicated landing page on the College's public facing website so to showcase the College's ambitions, programmes, and impact, and include an enquiry form to attract potential funders and partners. Internally, the profile of the Widening Access and Community team requires to be raised through staff communications and awareness campaigns, emphasising their role in trauma-informed learning and supporting care-experienced learners.	The faculty will liaise with the Comms and Marketing team to develop a website page. An internal comms will be developed and issued to all staff. A section on the faculties MyConnect page will be set up to maintain staff awareness. To be actioned by: CH Widening Access & Community/ Faculty Business Manager / AD Communications No later than: 12 June 2026
			Grade 3



Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 3 - The College has clear strategic aims with regard to outreach programme student recruitment and retention, and plans have been put in place to meet these aims.

Objective 4 - The setting of targeted outreach student numbers and, where relevant, Credits is robust and there is an adequate system in place for monitoring achievement against targets and reporting to senior management.

(continued)

In relation to student recruitment, ESOL student enrolment is tracked through Admissions and faculty via the SRP status reporting and attendance monitoring. There are clear procedures in place for monitoring attendance and performance, with course completion rates and grades monitored by the curriculum via Enquirer and performance reporting. Compliance on admission criteria and engagement is crucial to achieve SFC funding, similar to that of mainstream courses. This is reviewed as part of faculty performance management arrangements and annual Portfolio Review.

For Widening Access and Community programmes, funding is typically secured through an application process. Successful applications set the course objectives and delivery criteria. Measurable outcomes, such as attendance, are tracked in line with the College's attendance standards. However, these programmes often require flexible class provision, with participation being ad hoc due to the profile of learners, including those with complex needs. The primary aim is to provide learning opportunities when students are able to engage and develop life skills. Qualitative outcomes are captured through case study reviews.

Where credits are used to fund the programme, (such as DPG18 classes and mental health classes via the Rowanbank Education and Levensdale and Rowanbank Education programmes), recruitment, enrolment, and attendance is tracked through the College's Enquirer system. Attendance and outcome reports are developed and embedded, such as noted within the quarterly return submitted for the Multiply Project and the final report of the Kings Trust Funding / The Promise 2024/25.

As noted above, Widening Access & Community outcomes are not currently formally reported through the annual Portfolio Review (see **R2**) to ensure delivery is in line with College objectives for outreach programmes (see **R1**).

Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 3 - The College has clear strategic aims with regard to outreach programme student recruitment and retention, and plans have been put in place to meet these aims.

Objective 4 - The setting of targeted outreach student numbers and, where relevant, Credits is robust and there is an adequate system in place for monitoring achievement against targets and reporting to senior management.

Observation	Risk	Recommendation	Management Response
We were unable to evidence of internal measures set by the College which define the success of Widening Access and Community programmes or evaluate their contribution to improving attainment for individuals who might otherwise be excluded (through will or design) from traditional college education and/or employment.	The absence of defined success measures and evaluation criteria for Widening Access and Community programmes may limit management's ability to demonstrate impact of work done, with potential loss of engagement and potential new funding opportunities for the College.	R5 - Management should consider developing internal measures to evaluate the wider impact of outreach programmes. For example, number of learners enrolled from priority groups, geographic reach within Glasgow communities, surveys or focus groups measuring confidence, social integration, and employability or partnerships formed and income generated. These measures should factor into management reporting, such as the Annual Portfolio Review.	KPIs will be developed for the Outreach programmes to measure success. To be actioned by: CH Widening Access & Community / Faculty Business Manager No later than: 30 August 2026
			Grade 3



Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 5 - Where relevant, the College ensures compliance with UKVI Student Route requirements regarding monitoring of outreach student engagement and attendance, with escalation processes in place to identify those students who have failed to meet attendance criteria.

UKVI (UK Visas and Immigration) is the government department responsible for managing the UK's immigration system, including visa applications, settlement, asylum claims, and citizenship requests. UKVI student visa compliance checks, such as maintaining a Confirmation of Acceptance for Studies (CAS), monitoring attendance, and reporting to UKVI, apply to institutions sponsoring students under the Student Route visa.

International student checks are stratified based on whether they are short term students (less than 11 months) or long-term students.

As a licensed student sponsor, the College must comply with meet criteria, such as enrolment and attainment rates and financial thresholds set by the UKVI Student Route visa requirements. There must also be accurate record keeping of student attendance, student status changes, and comply with awarding body requirements.

Students themselves must also meet visa criteria to study in Scotland, which is available on the gov.uk pages.

The College, acting as a UKVI sponsor, must implement robust checks before enrolling international students including visa status verification (Student Route or Short-Term Visa) and monitor visa conditions, such as English proficiency, financial evidence, and course length, against the programme offered. Only after these checks are completed that a CAS is issued by the College. At enrolment, students must then provide evidence of their passport, any previous academic transcripts, offer letter and CAS confirmation and accommodation details. The fee status is also checked by the College. Ongoing compliance with UKVI Student Route is managed through international student attendance monitoring and course attainment, tracked through the College's reporting tools on Enquirer.

The SFC sets out eligibility for funding of ESOL learners in its Further Education Residency Guide (August 2025) and Fee Waiver Policy (available on the SFC website). ESOL participants include international dependents, New Scots, asylum seekers and their families, refugees, and others granted residency in Scotland. These learners are not sponsored under the UKVI Student Route. Colleges are responsible for confirming eligibility for SFC funding by verifying identity and immigration status in line with SFC guidance, using documentation issued by the Home Office or Local Authorities (e.g., ARC card, Bail 201 letter).

The eligibility status of ESOL students is a complicated matter and is compounded by the College being a UKVI student sponsor. For example, how the College should balance administrative checks on students at the College e.g. meet UKVI Student Sponsor compliance and SFC funding requirements.

For the start of the 2025/26 academic year, and triggered by enhanced compliance requirements for UKVI sponsors, the ESOL team completed an exercise to check the UKVI status of all enrolling and continuing ESOL students. This was a considerable administrative task, requiring the student to obtain a UKVI student visa code, with checks made online by ESOL teaching staff. The College's Compliance Officer also provided resource to support this assurance task.



Outreach (including Lifelong Learning, Community Engagement, ESOL and King's Trust)

Objective 5 - Where relevant, the College ensures compliance with UKVI Student Route requirements regarding monitoring of outreach student engagement and attendance, with escalation processes in place to identify those students who have failed to meet attendance criteria (continued).

Observation	Risk	Recommendation	Management Response		
The 2025/26 exercise to ascertain the UKVI and residential status of ESOL participants was completed for new and progressing ESOL students, with students no longer eligible for funding being removed from the programme. However, there remains no clear agreement between senior management and the ESOL team on whether enhanced UKVI student route checks apply to all ESOL students. The roles and responsibilities of teams involved in completing the checks is also not defined. Managers reported highlighted that the ESOL team are not trained in residency / eligibility checks needed to be performed. Additionally, the process for any ongoing checks on participants who continue on through the ESOL courses has also not been defined. A meeting between the ESOL team, the Faculty of Humanities and Education curriculum management, Admissions, is to take place during December 2025 to agree the processes to monitor compliance and the roles and responsibilities of staff involved.	Uncertainty over UKVI student sponsor compliance responsibilities on ESOL learners may result in inconsistencies in the assessment of learner eligibility for course enrolment and increased administrative burden on teaching staff for learners who do not require these checks to be performed, such as New Scots, asylum seekers or refugees.	R6 – Management should develop a formal UKVI compliance policy for International Students and learners on the ESOL programmes, which clarifies which learners require Student Route checks, SFC FE residency checks, SFC fee waiver checks, and which do not. This should be published for public awareness. Clear roles should be established for enrolment and ongoing checks across Admissions, ESOL team, and Curriculum Management for initial and ongoing checks. This should include escalation routes for individuals who do not meet eligibility or who are UKVI non-compliant. Those involved in residency and UKVI student Route checks should be appropriately trained to ensure consistency in the quality of checks made. A process for continuous eligibility checks for learners progressing through ESOL courses, including attendance monitoring aligned with SFC and UKVI sponsor requirements. Integrate these checks into existing mainstream monitoring arrangements. The risk associated with UKVI compliance should also be captured on the risk register.	An ESOL procedure is currently being developed which will cover roles and responsibilities. Continuous checks for residency status will be undertaken to make sure students are eligible to complete the course throughout the term. Currently we do not sponsor students to complete an ESOL course, if we do this in the future attendance monitoring will be completed in line with all Tier 4 category students. The UKVI Compliance risk will be considered and added as appropriate to the risk register. To be actioned by: Operational Effectiveness & Market Research Manager / E&H Faculty Business Manager / AD Student Registration & Funding / AD Governance & Risk No later than: 30 June 2026 <table><tr><td>Grade</td><td>2</td></tr></table>	Grade	2
Grade	2				



Aberdeen: 1 Marischal Square, Broad Street, AB10 1BL
Dundee: The Vision Building, 20 Greenmarket, DD1 4QB
Edinburgh: Level 5, Stamp Office, 10-14 Waterloo Place, EH1 3EG
Glasgow: Suite 5.3, Kirkstane House, 139 St Vincent Street, G2 5JF

T: 01224 322 100
T: 01382 200 055
T: 0131 226 0200
T: 0141 471 9870

Henderson Loggie LLP is a limited liability partnership registered in Scotland with registered number SO301630 and is a member of PrimeGlobal, a global association of independent accounting firms, the members of which are separate and independent legal entities. Registered office is: The Vision Building, 20 Greenmarket, Dundee, DD1 4QB. All correspondence signed by an individual is signed for on behalf of Henderson Loggie LLP. Reference to a 'partner' is a member of Henderson Loggie LLP. A list of members' names is available for inspection at each of these addresses.

