Audit of 2018/19 annual report and accounts (colleges)

Technical guidance note 2019/7(C)

AUDIT SCOTLAND

Prepared for appointed auditors in the college sector

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Audit Scotland is a statutory body set up in April 2000 under the Public Finance and Accountability (Scotland) Act 2000. We help the Auditor General for Scotland and the Accounts Commission check that organisations spending public money use it properly, efficiently and effectively.

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Foreword

Extract from the code of audit practice

> **Technical support**
>
> 108. Audit Scotland provides technical support and guidance to all appointed auditors. While appointed auditors act independently, and are responsible for their own conclusions and opinions, Audit Scotland has a role in ensuring that those conclusions and opinions are reached on the basis of informed judgement. Audit Scotland will consult with appointed auditors and other interested parties on the preparation of technical guidance and appointed auditors are expected to contribute. Consistency in similar circumstances is important and therefore appointed auditors should consider such guidance.

A key element of the technical support and guidance to appointed auditors referred to in the above extract from the Code of audit practice is technical guidance notes provided by Audit Scotland's Professional Support. It is a condition of the audit appointment that auditors are required to carry out the audit in accordance with guidance issued by Audit Scotland.

The purpose of this technical guidance note is to provide appointed auditors in the further education sector with guidance on performing the audit of the 2018/19 annual report and accounts.

Technical guidance notes are available to appointed auditors from Audit Scotland's *Technical reference library* (on ishare and the Extranet), and are also published on the Audit Scotland website so that audited bodies and other stakeholders can access them.

1 Introduction

Purpose

1. The purpose of this technical guidance note is to provide supplementary guidance on the risks of misstatements in the 2018/19 annual report and accounts that are specific to colleges. Auditors should read this technical guidance note in conjunction with technical guidance note 2019/1(CG) which provides guidance for central government bodies generally.

2. This technical guidance note provides guidance on risks specific to colleges in the following areas:

   - The complete set of financial statements
   - Measurement bases, valuation by internal valuers, impairment losses and disclosure of tangible fixed assets.
   - Calculation of early retirement provisions.
   - Treatment of arms-length foundations in group financial statements.
   - Retirement benefits, including the McCloud judgement.
   - Accrual method of grant recognition.
   - Disclosure of related parties.
   - Disclosure of agency arrangements.
   - Analysis of staff by band.
   - Content of the performance report.
   - Compliance with good governance.
   - Statement of responsibilities.

Contact point for this module

3. The main contact point for this technical guidance note is Helen Cobb, Senior Adviser (Professional Support).

4. Technical enquiries should be sent to TechicalQueries-FurtherEducation@audit-scotland.gov.uk.

2 Application of TGN 2019/1(CG) to colleges

Summary of TGN 2019/1(CG)'s application

5. The following tables summarise the application of TGN 2019/1(CG) to colleges, and either provide supplementary guidance in some areas or indicate the section of this technical guidance note in which it is provided.

Overview module

6. All sections of the overview module of TGN 2019/1(CG) apply to colleges. The following table sets out supplementary guidance in some areas:

Section	Supplementary guidance
Section 1 Introduction	The legislation which requires external auditors to audit the annual report and accounts prepared by colleges is the schedule 2 of the Further and Higher Education (Scotland) Act 1992 (the 1992 Act). The email address for auditors with enquiries on specific issues for the college sector is TechnicalQueries-Further education@audit-scotland.gov.uk.
Section 2 Financial reporting framework	Colleges are required to prepare their annual report and accounts in accordance with a direction issued by the Scottish Funding Council (SFC) under the 1992 Act. The 2018/19 accounts direction requires the financial statements to be prepared in accordance with the 2015 Statement of recommended practice: Accounting for further and higher education (the 2015 SORP) with a 31 July year end. The 2015 SORP requires colleges that follow it to apply all requirements of FRS 102. In certain areas, the SORP provides an interpretation to aid the practical implementation of FRS 102 (e.g. government grants. It also requires a small number of additional disclosures. Guidance notes from the SFC are intended to supplement the accounts direction. Early adoption of the 2019 SORP is permitted in 2018/19 but is not generally expected in practice.

Section	Supplementary guidance
	Colleges are registered charities and are therefore subject to The Charities Accounts (Scotland) Regulations 2006 (as amended). However, regulation 14 requires compliance with the further education SORP rather than the charities SORP.
Section 4 Presentation of financial statements	Supplementary guidance on a complete set of financial statements is provided at section 3.

Modules 1 to 8

7. Modules 1 to 8 of TGN 2019/1(CG) apply to colleges, although auditors should be alert to differences in terminology used by FRS 102. The following table sets out the subjects on which supplementary guidance is provided in section 4:

Module	Supplementary guidance
1 Property, plant and equipment	The SORP still uses the term tangible fixed assets. Supplementary guidance is provided on measurement bases, valuations by internal valuers, impairment losses, and disclosures.
2 Provisions creditors and accruals	Supplementary guidance is provided on calculating early retirement provisions.
4 Group financial statements	Supplementary guidance is provided on the treatment of arm's-length foundations (ALFs).
6 Grants and other income	Supplementary guidance is provided on the accrual model of grant recognition and disclosures. IFRS 15 in respect of other income does not apply to colleges.
7 Other financial statement areas	Supplementary guidance is provided on retirement benefits, agency arrangements and related parties.

Module 9 Non-financial statements

8. The accounts direction requires colleges to include a performance report and accountability report in their annual report and accounts in accordance with the FReM. Appendix 2 of the direction sets out the additional disclosures required by the FReM that apply to colleges, and Appendix 3 sets out required corporate governance disclosures.

9. Module 9 of TGN 2019/1(CG) applies to colleges. The following table sets out the subjects on which supplementary guidance is provided in section 5:

Section	Supplementary guidance and action
Section 2 Remuneration and staff reports	Supplementary guidance is provided on the analysis of staff by band.
Section 3 Performance report	Supplementary guidance is provided on the required content.
Section 4 Governance statement	Supplementary guidance is provided on compliance with good governance.
Section 5 Other non-financial statements	Supplementary guidance is provided on the statement of responsibilities.

Module 10 Charitable NDPBs

10. The sections on fund accounting and donations and legacies in module 10 of TGN 2019/1(CG) apply to colleges due to their charitable status.

3 Presentation of financial statements

Risks of misstatement

11. The following paragraphs highlight potential risks of misstatement in respect of the presentation financial statements that are specific to colleges, and set out actions for auditors to undertake to assess whether the college has followed the required treatment.

A complete set of financial statements is not properly presented

12. SORP section 3.1 sets out what a complete set of financial statements should comprise for a college. The differences to the FREM requirements for 2018/19 are summarised in the following table:

FReM statements	SORP statements	FRS 102 requirements
Statement of financial position as at 31 March 2019	Balance sheet as at 31 July 2019	FRS 102 section 4 sets out the requirements for a balance sheet as at the end of the period.
Statement of comprehensive net expenditure	Statement of comprehensive income (SoCI)	FRS 102 section 5 sets out the requirements for a SoCI.
Statement of changes in tax-payers' equity	Statement of changes in reserves	FRS 102 section 6 sets out the requirements for a statement of changes in reserves.
Statement of cash flows		FRS 102 section 7 sets out the requirements for a statement of cash flows
Notes to the financial statements		FRS 102 section 8 sets out requirements for the notes.

4 Financial statement areas

Risks of misstatement

13. The following paragraphs highlight potential risks of misstatement in respect of financial statement areas that are specific to colleges, and set out actions for auditors to undertake to assess whether the college has followed the required treatment.

Tangible fixed assets

The correct measurement basis for each asset is not used

14. Colleges are required to account for tangible fixed assets in accordance with section 17 of FRS 102. Specific requirements are set out at SORP section 11.

15. While the SORP allows tangible fixed assets to be measured using either the cost model or the revaluation model, the FReM requires a revaluation model. **Auditor should** therefore confirm that colleges have adopted a revaluation model in 2018/19.

Operational, non-specialised land and buildings are not properly valued

16. The SORP paragraph 11.10 requires assets measured using a revaluation model to be revalued to fair value, usually determined by a qualified valuer appraising market-based evidence.

17. Paragraph 20 of Module 1 of TGN 2019/1(CG) refers to a requirement in the 'red book' for an external valuer to check on a sample basis valuations carried out by an internal valuer. The red book has subsequently been revised so that this requirement no longer applies where the valuation date is on or after 14 January 2019.

Impairment losses are not properly accounted for

18. Impairment losses should be recognised in the revaluation reserve to the extent that there is a credit balance relating to the impaired asset.

19. Auditors should assess whether impairment losses on revalued fixed assets during 2018/19 have been recognised in the statement of changes in reserves and set against any revaluation surplus until the carrying amount of the fixed asset reaches depreciated historical cost and thereafter in the SOCI.

Information on tangible fixed assets is not properly disclosed

20. Colleges should comply with the disclosure requirements of FRS 102.

21. The requirements of FRS 102 include (at paragraph 17.31) a reconciliation of the carrying amount at 1 August 2018 and 31 July 2019. There is however no requirement in FRS 102 for a reconciliation in respect of prior periods to be disclosed.

Provisions, creditors and accruals

Provision for early retirements is not properly calculated

22. The SFC will advise of an appropriate discount factor (net interest rate) as at 31 July 2019, and will also issue an accompanying spreadsheet for the calculation of a provision for early retirement costs. A college may use a different net interest rate, if there is reasonable justification for doing so.

23. Professional Support will advise auditors when the information from the SFC becomes available.

24. **Auditors should**:

- confirm that provision has been recognised at 31 July 2019 for the actuarial cost of early retirements
- assess whether an appropriate discount rate has been used
- assess whether the provision is free from misstatement.

Retirement benefits

Retirement benefits are not accounted for on the correct basis

25. Retirement benefits are pensions payable to former employees after the completion of their employment. Retirement benefit plans (more commonly referred to in Scotland as schemes) are classified as either defined contribution or defined benefit. The differences in the accounting for these classifications and the applicability to colleges are set out in the following table:

Classification	Characteristics	Applicability
Defined benefit	Benefits are determined independently of the investments of the scheme. Employers have obligations to make contributions where assets are insufficient to meet those benefits. Liabilities are recognised as benefits are earned or awarded and are matched with the authority's attributable share of the scheme's assets.	Non-teaching employees are members of the *Local government pension scheme* (LGPS) which should be accounted for on a defined benefit basis.
Defined contribution	Applies to defined contribution schemes and defined benefit schemes where an employer is not able to identify its share of the underlying financial position and	Teaching staff are members of the *Teachers pension scheme*, which should be accounted for as if it were a defined contribution scheme.

Classification	Characteristics	Applicability
	performance of the scheme with sufficient reliability for accounting purposes. The employer's obligation is limited to the amount it has agreed to contribute to the pension scheme.	

26. **Auditors should** assess whether retirement benefit has been accounted for on the correct basis in 2018/19.

Teachers pension scheme is not properly accounted for

27. **Auditors should** confirm that the teachers scheme has been properly accounted for. The accounting treatment on a defined contribution basis involves employer contributions being charged to the SOCI as they become payable.

28. **Auditors should** assess whether:

- balances are recognised in the balance sheet only to the extent that there are prepaid or outstanding contributions at 31 July 2019
- employer contributions have been properly calculated and charged to the SOCNE
- amounts are free from misstatement.

LGPS is not properly accounted for

29. For employees that are members of the LGPS, **auditors should** refer to module 4 of technical guidance note 2018/10(LG). **Auditors should** note that the pension reserve regulations referred to in that module do not apply to colleges.

30. Two issues have arisen since the publication of TGN 2018/10(LG) that are relevant to accounting for the LGPS:

- Guaranteed minimum pension (GMP)
- The McCloud judgement.

31. The first issue relates to the requirement for a public sector pension scheme that was ‘contracted out’ of the additional state pension arrangements (before those arrangements ended in April 2016) to provide members with a GMP for service between 6 April 1978 and 5 April 1997. The GMP is broadly equivalent to the amount the members would have received had they not been contracted out.

32. Funding the annual increase in GMP was previously split between the Department for Work and Pensions and each pension scheme. However, the introduction of the new *Single state pension* in April 2016 brought uncertainty over the ongoing indexation of the GMP amount. This led to an interim solution being announced by the UK Government for members reaching statutory pension age (SPA) between 6 April 2016 and 5 December 2018, which involves the pension schemes funding all the increase.

33. The UK Government's preferred permanent solution is to convert GMP to a scheme benefit. However, until a number of complications have been addressed, the Government has extended the interim solution to 5 April 2021.

34. There is a range of approaches being adopted by actuaries to reflect the 'interim solution' which range from allowing for the additional liability for members reaching pension age up to 6 April 2021 to not making any allowance on the grounds of materiality (this is summarised on page 22 of the report from PWC report referred to in TGN 2018/10(LG)).

35. Where an actuary has provided a college with liability information that reflects GMP, **auditors should** expect the college to recognise that liability at 31 July 2019. The PWC report indicates that the estimated impact of the 'interim solution' is 0.1.% of liabilities. Where the actuary has not provided the information, **auditors should** compare the expected impact with their own materiality levels to determine the appropriate action.

36. There remains uncertainty around the long term solution for members reaching pension age after 6 April 2021, and therefore actuaries are generally not making any allowance in their figures for this aspect. The PWC report states that is expected to be around 0.2% of liabilities. Due to the level of uncertainty, and the consequent difficulties in arriving at a reliable estimate, it is expected that the disclosure of a contingent liability would be the appropriate treatment.

37. The second issue arises from recent rulings (generally referred to as the McCloud judgement) regarding transitional provisions in public sector pension schemes being unlawfully age discriminatory.

38. A liability should be recognised for the requirement to compensate certain members for any discrimination suffered as a result of the transitional protections. Although the nature of the compensation is not yet known, the Government Actuary's Department (GAD) undertook a scheme level review of the LGPS for England and Wales and has provided a report to provide an assessment of the potential financial impact. For example, based on an earnings increase of CPI (2.3%) plus 1.5%, the report estimates a potential impact of 3.2% of active scheme liabilities. Actuaries should be using this report to re-calculate pension liabilities at an employer level.

39. **Auditors should:**

- confirm that a liability for the compensation is recognised, where material, at 31 July 2019
- assess whether the amount estimated for the liability is reasonable
- confirm that an adequate explanation of the estimation uncertainty is disclosed.

Retirement benefits items are not properly presented on the balance sheet

40. **Auditors should** assess whether:

- an asset has been recognised to the extent that the college is able to recover a surplus either through reduced contributions in the future or through refunds from the scheme
- liabilities have been recognised in the balance sheet to the extent that they reflect a legal or constructive obligation.

41. The 2015 SORP does not provide for a separate pension reserve, and there is no concept of a pension reserve under FRS 102. **Auditors should** confirm that a pension reserve has not been presented in the balance sheet.

Information on retirement benefits is not properly disclosed

42. The disclosure requirements for retirement benefits are set out at paragraphs 28.41 and 28.41A of FRS 102.

43. **Auditors should:**
   - confirm that the college has complied with the disclosure requirements for 2018/19
   - confirm that the college has considered whether
     - any of the required disclosures are excessive when applied to their own circumstance
     - additional disclosures are required to meet the disclosure objectives
   - assess whether the disclosures are complete, clear, concise and free from misstatement.

44. Where colleges account for the LGPS on a defined contribution basis, **auditors should** assess whether the college has disclosed:
   - the cost for the period
   - any outstanding or prepaid contributions at 31 July 2019
   - the reason why sufficient information is not available to account for the scheme as a defined benefit scheme
   - the fact that the scheme is a defined benefit scheme but that the college is unable to identify its share of the underlying assets and liabilities
   - any available information about the existence of the surplus or deficit in the scheme and the implications of that surplus or deficit for the college.

Group financial statements

Entities which the college controls are not treated as subsidiaries

45. Paragraph 9.11 of FRS 102 states that consolidation as a subsidiary may be required where the objects of another entity are substantially or exclusively confined to the benefit of the college. This may be the case, for example, where the objects of an ALF are set so narrowly that the benefits cannot be applied to any party other than the college.

46. When considering control, **auditors should** examine the documentation for their college's local ALF and assess whether the objects of the charitable foundation are substantially or exclusively confined to the benefit of the college.

Entities over which the college has significant influence are not treated as associates

47. Where a college does not control an ALF, it may exercise significant influence. Significant influence is defined in FRS 102 as follows:

- If a college holds 20% or more of the voting power of an entity, it is presumed that it has significant influence, unless it can be clearly demonstrated that this is not the case.
- Conversely, if the college holds less than 20%, it is presumed that there is not significant influence, unless such influence can be clearly demonstrated.

48. In addition to voting share, in order to conclude on whether there is significant influence, **auditors should** consider other issues around the operation of the ALF including whether there is evidence that:

- the ALF has approved applications from third parties
- the ALF has rejected applications from the college
- there is a clear applications process which has been applied consistently
- the college's ability to exercise influence is included within the ALF governing documents.

Grants and other income

Financial reporting requirements

49. Colleges are required to account for government grants in accordance with section 24 of FRS 102. Specific requirements are set out in the SORP at paragraphs 17.13 to 17.17.

50. The SORP Section 17 allows revenue and capital (other than for land) government grants to be accounted for by applying the accrual model or performance model. he SFC considers this to be a 'conflict' with the FReM (which requires a methodology which equates to the performance model) and therefore considers that the SORP should take precedence. The SORP requires capital grants for land to follow the performance model.

51. Guidance on SFC funding is provided at paragraphs 7 and 8 of the guidance notes. Annex A of the guidance notes provide a model disclosure note.

Grants under the accrual model are not properly accounted for

52. For grants accounted for under the accrual model, **auditors should** assess whether:

- revenue government grants have been recognised in income on a systematic basis over the periods in which the college recognises the related costs for which the grant is intended to compensate
- capital government grants have been recognised in income on a systematic basis over the expected useful life of the asset to which the grant relates
- grant that has been deferred has been recognised as deferred income within creditors and not deducted from the carrying amount of the asset

- income has been recognised within the statement of comprehensive income under the relevant heading of funding body grants, research grants or other income as appropriate to the nature of the grant.

Information on grants is not properly disclosed

53. Annex A of the guidance notes contains a model note which colleges are required to adopt as far as possible. Any significant one-off or ring-fenced grants should be identified on a separate line. Smaller grants may be grouped together under the ‘other’ heading, but this should not represent a significant portion of the total grants received. **Auditors should**
    - confirm that the college has made the required disclosures
    - assess whether the disclosures are complete, clear, concise and free from misstatement.

Related parties

Related parties are not identified

54. In accordance with paragraph 33.2 of FRS 102, related parties for colleges include:
    - those members of the governing body (and close members of their family) who hold influential posts in public bodies (e.g. local authorities, non-departmental public bodies, etc), private sector organisations with which the college has transactions, and ALFs
    - senior staff, including those who hold influential posts in other bodies with which the college has transactions, e.g. an NHS board
    - associates, collaborations and joint venture entities not fully eliminated on consolidation
    - pension schemes for the benefit of employees of either the college or an entity related to the college.
55. Colleges should have given due consideration as to whether bodies such as students’ unions and separate development trusts are related parties in the context of FRS 102.

Agency arrangements

Agency arrangements are not identified

56. Colleges act as agents when they disburse funds on behalf of a funding body, and have no beneficial interest or risks related to the receipt and subsequent disbursement of the funds.
57. Paragraph 12 of the guidance notes lists the following as being agency arrangements:
    - further education bursary funds
    - discretionary funds
    - educational maintenance allowances.
58. Agency arrangements do not include
    - bursaries or scholarships made from a college's own funds

- childcare funds.

Depreciation budget disclosures

Disclosures on depreciation budget are not properly made

59. Paragraph 8 of Appendix 2 to the accounts direction requires an explanation of the impact of the depreciation budget for government-funded assets to be disclosed in:
    - a statement at the foot of the SOCI; and
    - a note to the accounts.

60. An illustrative form of words for the disclosure is provided at Appendix 6 of the accounts direction. An explanation is required because the combination of the following factors leads to a deficit in the SoCI equivalent to net depreciation:
    - The depreciation budget cannot be recognised as income in the SoCI.
    - Colleges are required to spend the entire cash allocation.

61. **Auditors should:**
    - confirm that the college has made the required disclosures in 2018/19
    - assess whether the disclosures are complete, concise, clear and free from misstatement.

ALF donations

Donations to/grants from arms' length foundations are not properly presented

62. Colleges have generally donated their surpluses to ALFs to bring them outside Scottish Government budgeting limits. Paragraph 21 of the SFC guidance notes recommends that the donation should be included above the operating surplus line in the SoCI and for this to be clearly disclosed.

63. Paragraph 10 of the guidance notes requires colleges to disclose separately any revenue or capital grants received from arms-length foundations.

64. **Auditors should:**
    - confirm that the college has clearly presented the donation/grant for 2018/19 in the SoCI
    - assess whether the donation/grant is free from misstatement.

5 Non-financial statements

Remuneration and staff report

Summary of financial reporting requirements

65. Paragraphs 27 to 32 of the accounts direction's Appendix 2 set out the requirements for the remuneration and staff report, (and an example is set out at Appendix 4.

Remuneration information has not been properly disclosed

66. Paragraphs 37 and 39 of the direction's Appendix 2 allows the option of disclosing the remuneration of the Principal in a note to the financial statements, with a cross reference in the remuneration report (or vice versa).

67. Professional Support recommends that the remuneration of the Principal should be included in the remuneration and staff report with the other senior officers.

Audited information in the staff report is not properly disclosed

68. Paragraph 31 of Appendix 2 requires the number of senior staff by band to be disclosed in the staff report. This disclosure should be audited.

69. However, paragraph 38 requires colleges to disclose in the notes:

- the total number of higher paid staff in bands of £10,000 earning over £60,000
- the number of senior post-holders within each band.

70. To avoid duplication, paragraph 39 of Appendix 2 allows the information to be disclosed in one place cross-referred to the other. Professional Support recommends that the information be disclosed in the staff report.

Performance report

Performance report is not in accordance with the accounts direction

71. The accounts direction sets out requirements for the performance report at paragraphs 3 to 15 of Appendix 2. In addition to the applicable requirements of the FReM explained in module 9 of TGN 2019/1(CG), the accounts direction also requires colleges to include the following in the performance report:

- A statement from the Chief Executive providing their perspective on performance
- A short summary explaining the purpose of the overview section.

72. In addition to FReM requirements, the accounts direction requires:

- a statement describing the payment practice code or policy adopted regarding the payment of suppliers and the performance achieved, together with disclosure of any interest paid under the Late Payment of Commercial Debts (Interest) Act 1998, or a statement that there were no matters to disclose

- an analysis of how the cash budget allocation previously earmarked for depreciation was spent. This is referred to as the 'cash budget for priorities' in the direction and the analysis should take the form of a table showing the expenditure under each heading and the impact on the operating position. An illustrative form of wording is provided at Appendix 5 of the accounts direction
- details of the adjusted operating position. The adjusted operating position reflects the financial performance of a college after allowing for non-cash adjustments and other one-off or distorting items. A template for calculating the underlying operating position is provided at Appendix 7 of the accounts direction. Paragraph 15 of Appendix 2 introduces a new requirement for 2018/19 for colleges to submit their annual operating position calculation to the SFC prior to being signed off.

73. As a result of the different requirements, a checklist specific for colleges is provided at appendix 1 to this technical guidance note. In order to assess whether required information has been omitted in 2018/19, **auditors should** assess whether the performance report includes the items summarised in the checklist.

74. The requirement in previous years to disclose details of a college's financial year resource position including a statement of the financial year end outturn against both resource and capital budgets, together with an explanation of any variances has been removed from the 2018/19 accounts direction.

Governance statement

Governance statement is not in accordance with the accounts direction

75. The accounts direction requires colleges to include with their financial statements a statement covering the responsibilities of their board of management in relation to corporate governance. Paragraph 4 of the direction's Appendix 3 requires colleges to refer to the good practice note on governance statements published by Professional Support.

76. The SFC requires the governance statement to indicate how the college has complied with good practice in this area, including the Code of good governance for Scottish colleges, which colleges are required to comply with as a condition of grant. Colleges are required to include either a statement confirming compliance with the code or explanations for any non-compliance. The template to be used for the compliance statement is provided at Appendix 3(a) of the direction.

Statement of responsibilities

Statement of responsibilities is not in accordance with accounts direction

77. Paragraph 21 of the accounts direction's Appendix 2 explains that, due to governance arrangements in the sector, colleges are required to provide a statement of responsibilities of the board of management rather than the accountable officer.

Appendix 1

Checklist - required content of performance report

Required item	Yes/No/N/A
1 A short summary explaining the purpose of the overview section.	
2 A statement from the college Principal setting out their perspective on performance	
3 A statement of the purpose and activities of the college including a brief description of the business model and environment, organisational structure, objectives and strategies	
4 Key issues and risks that could affect the college in delivering its objectives	
5 Explanation of the adoption of the going concern basis where this might be called into doubt	
6 Performance summary	
7 Information on how the college measures performance i.e. what the college sees as its key performance measures, how it checks performance against those measures and narrative to explain the link between KPIs, risk and uncertainty	
8 Detailed analysis and explanation of the development and performance of the college during the year and an explanation of the relationships and linkages between different pieces of information	
9 Information on social matters, respect for human rights anti-corruption and anti-bribery matters	
10 Information on environmental matters including the impact of the college's business on the environment	
11 Confirmation of compliance with Scottish Government sustainability reporting requirements.	
12 A statement describing performance against the prompt payment code.	
13 A breakdown of the spend on the cash budget for priorities.	
14 Details of the adjusted operating position	