

FE Commissioner Intervention Summary: Greater Brighton Metropolitan College (GBMC)

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Background

Name of College	Greater Brighton Metropolitan College (GBMC)
UKPRN	10004736
Type of provision	General further education (FE)
Date of visit	27 to 28 August 2020
Type of visit	Intervention assessment (blended visit: day 1 onsite, day 2 virtual)
Trigger for formal intervention	Request for emergency funding (EF) and subsequent Notice to Improve (NtI)
Further Education Commissioner (FEC)	Richard Atkins - FEC
Team members	Stephen Hutchinson - FEC Deputy
	Frances Wadsworth - FEC Deputy
	Nigel Duncan - FE Adviser
Location	Brighton
Apprenticeship training provider	Yes
Latest Ofsted inspection grade	Requires Improvement (RI) (2019)
Education and Skills Funding Agency (ESFA) Financial Health Grade	Inadequate
Structural history/recent mergers	Formed on 1 April 2017 after merger of Northbrook College and City College Brighton and Hove (CCBH)

Conclusion/Executive summary

Greater Brighton Metropolitan College (GBMC) is facing several serious and deep-seated challenges, relating to both financial and quality issues. The college has been in difficulty for several years, with a deteriorating position following the 2017 merger. Declining recruitment, income and quality, have, year on year, impacted upon the college's operation, performance and sustainability. Progress against recommendations that were made following the December 2019 FEC diagnostic assessment (DA) was limited until the appointment of a new chair in April 2020. From this point onwards, timely and decisive action has been taken to address the significant prevailing challenges. That said, many of the issues that were highlighted by the December 2019 FEC DA still need addressing.

The new chair, who was appointed through an external recruitment process in April 2020, has led a refresh, review and recasting of the board's committee structure and membership. There is now a shared understanding across the board of the issues that the college faces and a clear sense of purpose. Following the chief executive's (CEO) resignation in June 2020, an interim CEO was appointed. His approach and grasp of the challenges is encouraging. Governors and staff whom the FEC team met were positive about the change in leadership and style of engagement.

Refining the college's curriculum structure, strategy, planning and management will be a key development during 2020/21. To stem the significant decline in learner recruitment, the college needs to use accurate market intelligence to ensure that targeted recruitment can be achieved. Market research that has been recently undertaken on behalf of the college will help to inform this process. In addition, further work needs to be implemented to improve curriculum efficiency through better management of the organisation's cost base, combined with effective learner recruitment strategies. Currently, the quality of provision is mixed, with some of the college's classroom-based provision showing signs of general improvement against a backdrop of poor attendance patterns, especially in 16 to 18 entry level provision, higher education (HE) and apprenticeships.

Liquidity is weak, debt levels are high, and the underlying operating performance is poor. Total income is declining, staff costs are too high, and the college is operating across 5 main delivery sites. There are numerous trigger points over the next 2 years that are likely to further increase annual debt servicing costs. It is essential that a long-term, financially sustainable recovery plan is developed that is based on a realistic assessment of the college's future.

Recommendations

Recommendation 1: The college needs to draw up a realistic recovery plan for the ESFA and the bank as a matter of urgency. The plan must recognise the acute difficulties that the college faces and consider all options to secure sustainable FE provision in Brighton and Worthing. A draft of the plan should be agreed by the board and submitted to the ESFA by 30 September 2020.

Recommendation 2: The recovery plan needs to be clear about and address issues relating to the very high levels of debt, high staffing costs and multiple campuses.

Recommendation 3: The board should hold a strategic awayday in the autumn, focussing on strategic options for providing good quality and sustainable FE college provision in Brighton, Worthing and surrounding areas in Sussex. The FEC team recommend inviting a guest speaker from an out-of-area FE group.

Recommendation 4: The board and leadership need to urgently address the multiple inefficiencies in the way that the college is managed.

Recommendation 5: The college needs to significantly reduce the college's cost base as quickly as is practicable, in part to recognise that the college is circa 25% smaller than at the point of the merger in 2017.

Recommendation 6: The college is not sustainable on 5 campuses. The college should urgently develop a new estates strategy.

Recommendation 7: The college must urgently improve information systems within the college so that governors and staff can access appropriate information and dashboards to inform decision making.

Recommendation 8: The college needs to urgently address issues relating to teaching and learning that were raised in the 2019 Ofsted inspection report so that the college improves to a rating of Good.

Recommendation 9: Risk management is underdeveloped and does not sufficiently inform leadership and board decisions. The executive should ensure that the risk register and associated risk management processes are reviewed and strengthened. The audit committee and board should approve such revisions by December 2020.

The FEC team will conduct a stocktake visit to monitor progress in late October 2020.

Governance and leadership

Governance

Since her appointment, the new chair has taken decisive action and has led, at pace, a significant refreshing of the board's membership. The board now has 12 members, including a vacancy for a student governor, with a further 2 co-opted members, both of whom attend audit committee meetings. An experienced chair of audit is now in place, having been secured for 6 months whilst a recruitment campaign is undertaken to fill this position. There are plans to recruit a further 2 governors, one with FE teaching and learning expertise and another with change leadership experience.

The new chair has taken a strong lead in strengthening the board, improved ways of working, and, with the support of 2 National Leaders of Governance (NLGs), the clerk, and the agreement of the board, has moved rapidly to revise its structure, moving from a Carver model to a more traditional committee structure (finance committee, audit committee, remuneration committee and teaching and learning committee) to allow closer scrutiny of these respective aspects. Terms of reference have been agreed and the committees will be in place for the coming academic year. An ad hoc special committee has also been created to allow a tight focus on developing the college's recovery plan, investigating options and addressing the most pressing challenges. It will report appropriately and regularly to the full board.

Upon the resignation of the CEO, the new chair and board took timely action to secure an able and experienced interim CEO, who took up post on 10 August 2020. During his short time in post, the interim CEO has had a high-profile presence, visiting campuses and meeting with staff and managers and, with the chair, addressing staff to explain the college's position and challenges. The interim CEO's and new chair's frank and open communication was appreciated by many of those whom the FEC team met. Whilst there was concern regarding the seriousness of the college's position, there was a recognition that clarity is essential if the challenges that the college faces are to be addressed.

Board members whom the FEC team met – who were a mixture of new and some longer-standing members – were supportive of the chair and now felt clear regarding the college's significant and serious challenges. All remarked upon how quickly the new membership had gelled and their shared determination to address concerns in an open manner. Comments were made to the FEC team that there was now a realisation, which long-standing members had not previously been aware of, that the college had been, "running on empty", "living beyond its means" and with, "financial performance not as central in decision making previously as it needed to be". Whilst there was a recognition that Covid-19 had had some financial impact on the college, there was a realisation that there were more fundamental and significant underlying performance issues that had existed for some time and had not been addressed. Governors spoke of, "a new steel", in the board and their determination to review options to find a sustainable future for the college, addressing inefficiencies and excess capacity with a "great new board".

The new chair and board were well-sighted on the degree of challenge that the college faces and appreciate the need for decisive and timely action to prevent further decline. The chair outlined the board's positive approach to reviewing all strategic means to secure a way forward for learners and learning in the area and a resolve and openness to consider all options that might secure a sustainable provision going forward. The chair and interim CEO informed the FEC team that the previous onerous and time-consuming preparation of reports to the board is now being revised and replaced with a focus on timely, pertinent content to enable effective decision making.

Leadership

The interim CEO has been seconded from a neighbouring Outstanding FE college for an initial 6-month period. At the time of the 2019 DA visit, the CEO led an executive team of 3: the principal, chief operating officer (COO) and human resource (HR) director. The HR director resigned in February 2020 and her post was not replaced. The head of HR, which is an existing post, now reports to the COO. In other respects, the structure is as it was at the 2019 FEC DA. The FEC team's judgement is that the resource that is devoted to the curriculum leadership and management team is unsustainable for the college's size, as is the level of associated abated teaching time. There are 4 tiers (CEO, principal, assistant principals, heads of curriculum) with no teaching requirement and 2 further tiers (curriculum leaders and programme leaders), which have various levels of remission

from teaching. This is unaffordable and, in some instances, there is a lack of clarity regarding roles. A streamlining of responsibilities and refocusing of roles would aid accountability and decision making. This is an urgent requirement going forward.

Trade union representatives whom the FEC team met were surprised that the size of the management team had not been addressed at the point of merger in 2017. They had expected a, "flatter management structure", to be brought in, recognising that it was unwieldy and "unaffordable". They noted that whilst communications had become regular during lockdown, they felt that previously they had not always been given the precise truth and that financial difficulties had not been properly outlined. They welcomed the transparency and motivation to take the college forward that the interim CEO has brought. Their express wish now is for the interim CEO and new chair to lead the college to, "make the right decision, no matter how painful, for the college to go forward".

The FEC team were advised that 2 safeguarding issues had arisen in the recent past, which the board had not been briefed on at an appropriately early stage. The new chair assured the FEC team that appropriate steps had been taken to clarify the need for appropriate communication with the safeguarding lead on the board at an early stage and an expectation of a wider consideration of any issue to encompass all of those who are affected.

The April 2019 staff survey had indicated a number of serious concerns, with only 35.2% feeling that staff were well led and managed and only 31.2% considering communication to be effective; 20% below the benchmark and lowest of the 39 colleges that are using the same survey. Whilst staff focus groups had been employed, with external input, to bring about improvement, it was clear from staff, managers and union representatives whom the FEC team met that there remain significant issues to address.

The recent webinar that was held for staff by the chair and interim CEO was well received. There was a positive response to the frankness and clarity that they brought to explaining the college's position. Staff spoke of the, "honest, transparent communication", and focus on the best ways forward for the college. Those whom the FEC team met spoke of their shock at understanding the extent of the financial difficulties that the college is experiencing, hearing that the college had been issued with a Notice to Improve and also about the recent departure of the CEO. Staff now felt that communications, albeit via webinars and virtual means, had improved significantly, with the opportunity to ask questions. There were positive comments from managers and staff regarding efforts that the interim CEO had made to meet with them and visit the college's various centres. Many also expressed confidence that he brought with him sound leadership experience.

The interim CEO's decision to change the meeting structure from meetings with just the 2 other executive team members (COO and principal) to include the wider senior leadership team in regular senior team meetings had been positively received. Managers

whom the FEC team met already felt much better informed and were encouraged that they would be included and actively engaged in decision making.

Curriculum and quality improvement

Curriculum and provision overview

Since the December 2019 FEC DA, little has changed in the college's curriculum offer, with the college offering a wide range of vocational, technical, and professional courses across its 5 centres in Brighton, Shoreham and Worthing. The interim CEO is committed to a root and branch review of the curriculum alongside the college developing a new strategic plan. Significant declines in recruitment across all provision, combined with marginal performance in several areas of the college's provision, notably apprenticeships and HE, suggest that a radical adjustment to recruitment, curriculum and quality strategies are critical to its long-term sustainability. Analysis of the college's market share suggests that the areas that the college is most successful in are curriculum areas where the market is in decline e.g. art and design. The college's market share of the adult provision is also being eroded by competitors who have adapted their provision more quickly to the prevailing market trends.

The interim CEO has identified the need for high-level external support to bring about the changes that are required to secure the immediate future of the college. It is essential that any changes that are made urgently need to improve the efficiency of the organisation, increase market share and address areas for improvement. Curriculum managers recognise the need for change and are positive about what needs to be done to address the issues that have recently been presented by the chair and interim CEO. Acknowledging that the curriculum management structure is complicated, costly and unwieldy, and lacking clearly defined lines of authority, responsibility and accountability, the interim CEO will be undertaking a review of the management structure to create a structure that will deliver the improvement that is required to secure the college's future.

Curriculum planning and development

The college has an established curriculum and resource planning cycle that plans and processes the following year's curriculum between January and September/October. The 3-phase approach of curriculum set-up, contribution analysis and post-enrolment review is logical and timely, if completed both comprehensively and effectively. The interim CEO recognises the need for effective curriculum planning, including accurate contribution analysis at course level upwards, as an essential process that the college must refine. Progress has been made during 2019/20 to attribute proportional costs to activity but understanding of these processes across management levels is inconsistent and requires further development to achieve the necessary efficiency throughout the delivery of the college's curriculum portfolio. The college currently achieves a financial contribution of circa 35% from curriculum activity, some 10-15% below what it needs to

achieve. This significant and unsustainable inefficiency in the cost base of the college must be addressed during the current academic year (2020/21).

Quality: self-assessment & effectiveness to manage and improve quality

Student and apprentice attendance declined during 2019/20 by an average of nearly 4%. Acknowledging that attendance during 2019/20 has been disrupted by the COVID-19 pandemic, 2020/21 will be an opportunity for the college to demonstrate its capacity to improve attendance with a marked improvement across all provision types. Retention has generally improved and is above national averages for like provision. Achievement at the college is inconsistent, with a mixture of improvement and decline.

Most of the college's immediate competitors, who recruit from Brighton and Worthing, which is the college's main catchment area, benefit from having Ofsted inspection grades that are higher than GBMC's. This is impacting on the college's reputation and overall recruitment.

Study programme performance is improving, with most learners on programmes that have improved against previous years' performance and current national averages. However, areas where performance is struggling remain, notably 16 to 18-year olds on lower level courses and others on HE courses. Senior managers acknowledged the need to radically improve performance in these areas of classroom-based provision. Interestingly, in 2018/19, the college's all age overall achievement rate was higher than its competitors'. The forecast for 2019/20 is further improvement (circa +0.6%), though the data masks a spiky profile.

The college is the largest apprenticeship provider in the Coast to Capital LEP area. Its performance since merger has been very disappointing with its latest 2019/20 outcomes forecasting further decline. This trend of decline means that the college will have breached minimum levels of performance for 3 consecutive years. The plan that the college is working on to address the poor performance, which was a key issue during the recent Ofsted inspection and a critical benchmark for the ESFA, will result in a change to the assessment resourcing structure which will undoubtedly strengthen the assessment process by achieving a higher level of accountability. The college is also planning to rationalise the breadth of apprenticeships that it offers to streamline provision for greater efficiency and better quality.

Sub-contracted provision is an area for concern, with over half (53%) of learners in 2018/19 taught by sub-contracted provision that was considered poor. The college planned to increase sub-contracted activity in 2019/20, which is contrary to its stated policy to reduce sub-contracted activity. However, based on the R12 data return, the actual outturn has been a reduction against the previous year. The interim CEO is

committed to reducing sub-contracted activity during 2020/21 and making better use of the adult education budget (AEB) funding through directly delivered provision.

At the time of the FEC intervention assessment, the college had not completed the self-assessment cycle for the 2019/20 academic year. The quality improvement process, including the college's post-inspection action plan, is undergoing review to substantially improve the smartness of its targeting of specific areas for improvement, together with better monitoring and reporting. Progress is in line with the quality cycle. The development of an accessible corporate dashboard that provides live key performance data will help governors and leaders to monitor progress, predict underperformance, implement interventions as and when is required and celebrate success.

The college's retention performance in 2019/20 is forecast to improve on the previous year, with apprenticeship retention showing the highest level of improvement at +16.4%.

Based on current applications and historical performance, planned growth is unlikely to be achieved during 2020/21. Since 2017/18, recruitment of 16 to 18-year olds and adults has declined by 14% and 9% respectively. Apprenticeships recruitment has also declined over the same period by 30% and 36% respectively. Classroom-based recruitment will continue to be challenging, due to:

- Historically poor conversion rates of 63% for new entrants and 76% for progressors.
- 2020/21 applications following a similar conversion rate trend.
- GCSE grade inflation potentially creating a further risk to market share.
- Higher market shares in declining school subjects art and design.
- Increasing competition from higher education institutions (HEIs) that are seeking to address under-recruitment from international markets with home students.

Apprenticeship recruitment will be challenging in 2020/21 due to the impact of COVID-19 on the economy and opportunities for apprenticeship and other employment. The college has recognised this by reducing its budgeted targets in both apprenticeships and HE. The board and interim CEO have acknowledged the recruitment issues that the college faces and are considering significantly increasing the marketing resource to raise the profile of the college, and its strengths, across all its markets.

The interim CEO has quickly identified the need to strengthen curriculum, design, development, delivery and quality. He is committed to improving the structures and procedures for addressing the challenges that the college has in relation to the quality of provision. Alongside the important process of self-assessment of performance and allied quality improvement, the college is addressing areas for improvement that were detailed in the October 2019 Ofsted full inspection report. Whilst progress has been made to

maintain improvements to most classroom-based provision, disappointingly, the most significant weaknesses that were identified during the 2019 FEC DA still prevail. Specifically, according to the 2019/20 forecast outcomes that the college provided during the intervention assessment, apprenticeship and HE outcomes continue to decline. The planned changes to the apprenticeship assessment resourcing model will need to be implemented before the end of the autumn term if they are to have an in-year impact.

Student and staff views

Due to the time of year that the FEC intervention assessment took place, access to student views was limited. The learners whom the FEC team spoke to thought highly of the college, their teachers, tutors and assessors and were generally complimentary about how the college had managed their learning and assessment during the COVID-19 pandemic. There was some criticism relating to tutor engagement during lockdown. Other criticisms related to underinvestment in equipment (digital), and late cancellation of level 4 progression routes, resulting in students looking to progress to other providers' courses. Opportunities for enrichment were considered to be limited.

As previously noted, most of the comments that the FEC received from staff, managers and union representatives were related to the leadership and management of the college and communications. Staff were generally positive about the style and approach of the new chair and interim CEO, especially about the frankness and openness of their communication. Comment was made that communications had improved significantly through the lockdown period and they were encouraged by the interim CEO's efforts to visit centres and meet people. That said, they were concerned by the many serious challenges that the college faces and worried for the college's future and their own jobs.

Finance and audit

Recent financial history and forecasts for coming years

The college has struggled with underlying operating performance since the 2017 merger. In the first full financial year of activity post-merger in 2017/18, it recorded a significant operating deficit. In the following year (2018/19), under performance continued and, in 2019/20, a further deficit is forecast for the year. Over the last 3 years, the board and the senior team have been unable to address these performance issues. Overall income has declined, 16 to 18 learner numbers have been falling, AEB was lower than target last year, apprenticeships performed poorly, HE income has reduced by a third since the merger and commercial income targets have not been met. Staff costs as a percentage of income remain too high. All of this has weakened liquidity and left the college in a position where it required EF in the summer of 2020 in order to provide sufficient cash to maintain operations. The college has set a base budget for 2020/21 as an interim measure, pending the preparation of a financial recovery plan, as required by the NtI that was issued in June 2020.

Financial performance 2019/20

In 2019/20, the projected final position for the year as per the July management accounts is a significant operating deficit, with a negative education earnings before interest, taxes, depreciation, and amortization (EBITDA). Whilst some of this poor trading performance can be attributed to the impact of COVID-19, the college was struggling to meet key income targets long before the associated lockdown. During the December 2019 FEC DA, the FEC team noted that HE, apprenticeships and 16 to 18 were all significantly below target for the year. The 16 to 18 learner numbers finished the year below the funding allocation target.

Staff costs finished the year 2019/20 significantly above the FEC benchmark of 65%. All but one of the other 5 FEC benchmarks were not met in 2019/20. The only one that was met (as per the college management accounts) was current ratio. However, the college received EF prior to year-end, without which there would have been a significant negative cash position. The college has also breached a loan covenant and, without a formal letter of waiver from the bank, the full amount of the outstanding bank loan will probably be shown in short-term creditors when the financial statements are finalised, meaning that all 6 benchmarks will not be met.

Financial health will be Inadequate in 2019/20, with 0 points for EBITDA and borrowing under the ESFA financial health scoring model. If the bank loans are reclassified into creditors of less than one year, it is likely that the current ratio will score 0 points as well, resulting in the lowest possible financial health score of 0 in all 3 categories. This clearly demonstrates the college's very weak financial position.

Financial forecast 2020/21

The college is currently working on preparing a financial recovery plan, the first draft of which is due to be submitted to the ESFA by the end of September 2020. The interim base budget is for an operating deficit; however, this will be superseded by the financial recovery plan, which will include a range of actions to reduce the operating deficit. There are clear opportunities to reduce the cost base to bring it more in line with the realistic size of the college. During the December 2019 DA, the FEC team noted the apparent excess number of management posts, low levels of teaching staff utilisation and high levels of remission in some areas. The new interim CEO and the refreshed board recognise that there are significant inefficiencies and are committed to addressing these in the recovery plan. There are also likely to be further challenges with falling income. The current enrolment projections for 2020/21 suggest that there is a high risk of falling short again this year, which will bring a further reduction in 2021/22. Other key income assumptions could also prove to be optimistic given recent track record and the risk of further impacts of COVID-19.

Cashflow / liquidity (including overdraft details and usage if appropriate)

The college would have run out of cash by the end of June 2020 had it not received EF. The 12-month cashflow that was prepared on the basis of the base budget for 2020/21 shows that the college will not require any further EF. However, as noted above, some key income assumptions may be at risk. No staff restructuring costs are included in the cashflow and there is a critical timing issue on the receipt of a final disposal receipt that is due in early 2020.

Financial liabilities / loans

Total borrowings, including outstanding amounts that are owed on finance leases, represented 72% of total income for the year as of 31 July 2020. These liabilities include a bank loan, a revolving credit facility (RCF), and a long-term loan with the council. In addition, the college has a restructuring fund loan from the Department for Education (DfE), much of which remains outstanding. These debts and the associated servicing points will put an enormous pressure on cash over the next 2 years.

Audit and risk

The main issue for external audit is being able to sign off the accounts as a 'going concern'. For the 2018/19 financial statements, the external auditors were of the opinion that there was material uncertainty and provided an emphasis of matter paragraph in their audit report. The assessment of 'going concern' for the 2019/20 accounts will once again be very challenging.

The college's risk management process requires further development. The current key risk schedule and risk registers provide an overview of the college's prevailing risks and red, amber, green (RAG) rate them against impact and probability. However, too many risks retain a very high residual score, which, in some cases, is the maximum available. This suggests that:

- a. the college has a risk appetite that is too high to effectively manage; and/or
- b. key control measures are failing to mitigate the risk sufficiently to reduce the residual risk to a manageable level.

The chair and interim CEO are aware that this, aligned with an effective corporate dashboard, is an urgent process that needs reviewing and development to ensure that senior managers and the board maintain a well-informed oversight of the college's complex risk profile.

Long-term sustainability

The financial recovery plan that the college is currently preparing will attempt to show how the college can be financially sustainable. However, given some of the fundamental weaknesses in the college's finances, this will be very difficult to achieve. It is therefore essential that the recovery plan is prepared on a realistic basis. It is the FEC team's opinion that the college is unlikely to be able to demonstrate long-term financial sustainability without radical change, which could include structural change. The underlying operating position probably needs to be significantly improved to generate sufficient cash, which will be required to service the large debt burden, ongoing capital investment and strengthen liquidity. It is difficult to see how the college can deliver this on the current operating model of delivering across 5 sites.

Estates and capital plans

Use and maximisation of college estates and assets

As noted above, the college operates across 5 main delivery sites from East Brighton across to West Worthing: a range of nearly 20 miles. Three of those sites are owned and 2 are leased. Space utilisation across the sites is currently low. There are specialist facilities on all sites. Opportunities for partial disposal have already been delivered at the 3 owned sites. There is currently further work in progress to sell one site. The college are of the view that there are no other significant partial disposal opportunities.

Property management and investment

The current major capital investment project at the Pelham site in Brighton city centre will provide an overall reduction in space, create an area of newbuild, refurbish half of the 10 floors in the Pelham Tower, and dispose of the poor quality city centre buildings. This still leaves a significant investment that is required in the remaining areas of the Pelham site. The college has considered some initial options to review the remaining estate. These include disposing of either of the Worthing sites and consolidating onto the other one or disposing both and acquiring a new site. These options either have significant funding gaps and/or logistical issues around having sufficient space to complete a consolidation. The overhead cost of running 5 sites is expensive and efficiency opportunities for curriculum rationalisation are diluted by falling learner numbers. The resolution of the estate infrastructure will be a key feature of improving financial operating efficiencies and further work on an estate solution is required. The college should develop the work on the contribution analysis by curriculum area to identify the financial contribution that each site provides.

Appendix A – Interviewees

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Chair
CEO
COO
Principal
Assistant principals
Deputy COO
Heads of curriculum
Head of management information systems
Head of quality
HR manager
Head of learning and development
Financial controller
Group of students
Group of staff
Trade unions representatives
Group of governors

Appendix B - Documents reviewed

Board structure, membership and CVs

Management organisation chart

Annual college calendar

Senior leadership team CVs

Self-assessment report (2018/19)

QIP and progress against it

Risk registers

Ofsted FES online education review

2020 matrix report

College performance table

Financial information template

Strategic plan

Finance record 2019 and audited financial statements

July 20 management accounts

IFM February 2020 and financial plan

2020/21 financial plan, cashflow and commentary

Latest audit findings report from external and internal auditors

Summary of loans

Contribution analysis summary

CEO report to board - July 2020

Updated FEC action plan



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