

Glasgow City Council Internal Audit Section

Committee Summary

Corporate Review – Mandatory Qualifications, Training and Memberships

Item 8(a)

19th August 2026

1 Introduction

- 1.1 As part of the agreed Internal Audit plan, we have carried out a review of the arrangements in place within the Council to ensure that relevant staff have the required qualifications, training, and memberships.
- 1.2 Certain posts within the Council require officers to have essential qualifications, training, and memberships. Qualifications should be verified as part of the recruitment process and training/memberships monitored locally by the line managers. Depending on the type of qualification, training or membership held there will be a requirement for this to be renewed and updated periodically, or when a change in circumstances occurs. It is therefore important that the Council takes a pro-active approach to ensuring that the essential skills and qualifications are maintained.
- 1.3 The Council also provides mandatory training to staff, including but not limited to, training regarding health and safety and information security. The training that is mandatory may vary by role and it is important that Council Services are aware of the training needs of staff. Completion of mandatory training should be monitored with appropriate actions taken to ensure compliance.
- 1.4 In 2020, a working group was established to review the management of training records across the Council and included officers within HR and Corporate Health and Safety. The group explored options and systems currently available that could be used to track and manage training, including the Tesselio (GOLD Platform) and SAP, however through engagement with Service stakeholders, it was identified that the systems currently available do not meet the 'must have' requirements of a system in order to adequately manage training records. In 2025, an Action Plan was developed that identifies key requirements relating to training, namely the identification of a Corporate Training Owner and resource to take forward the rest of the actions. To date, these actions remain open. The working group is no longer in place, and the actions currently sit with the Head of Corporate Health & Safety, Resilience and Asset Management.
- 1.5 The purpose of the audit was to provide assurance that arrangements are in place to ensure that compliance with mandatory qualifications, training, and memberships are effectively managed and monitored. This included driving licences, and membership of professional bodies. The audit included a review of the key controls in the following areas:
 - Roles and responsibilities.

- Documented policies, procedures, and guidelines.
- Identification of roles that require mandatory training, qualifications, memberships and licences.
- Processes for validating essential qualifications, training, licences and memberships.
- Ongoing monitoring of compliance and validity, and
- Reporting arrangements.

1.6 The audit did not include a review of membership of the Protection of Vulnerable Groups (PVG) scheme.

2 Audit Opinion

- 2.1 Based on the audit work carried out a limited level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and four recommendations which management should address.

3 Main Findings

- 3.1 Although the Corporate Recruitment Toolkit provides guidance on the initial verification of qualifications and memberships, the guidance does not include the arrangements for ongoing monitoring of these. It also does not include the arrangements for the verification of teacher qualifications and memberships which follows a different recruitment process. Through numerous conversations with all Service HR and corporate HR contacts, it was confirmed that it is the responsibility of the line manager to ensure that mandatory training is being completed by staff and that ongoing monitoring of this training, qualifications and memberships is being undertaken, however this is not defined anywhere.
- 3.2 A training matrix for all Services was developed in 2017 that outlines the mandatory and desirable training courses, refresh periods and job titles of staff who should complete the courses, however the document is out of date and its existence is not well known to staff. Due to a lack of up to date information relating to mandatory training, the sample testing in this area was limited. We therefore focused on training known to be mandatory for all staff across the Council
- Information Security. As at the 30th of April 2026, no Service had 100% compliance, with overall Council Services compliance sitting at 83%. Information Security completion rates are currently reported to the Extended Information Security Board and the Information Security and Integrity Board.
- 3.3 A complete record of all mandatory training undertaken by Council staff is not maintained therefore effective monitoring of completion rates is currently not possible.
- 3.4 Service HR contacts advised that recruiting managers, with advice from HR, use the job profiles alongside existing job specifications to establish the mandatory qualifications for a role. We chose a sample of 40 roles across the Council to review and for a sample of 147 employees who held these roles we sought to confirm that they had the required qualifications, memberships and licences as per the job profile/specification for the role. Through review of the available records, we found areas of non-compliance.

- 3.5 There is no corporate policy relating to driving licences and instead each Service should have its own. Although all Services had a document in place that outlines the arrangements for checking licences, we found that all documents had not been reviewed/updated in a number of years and were not well known by staff.
- 3.6 We were advised that there are no specific roles within Chief Executives Department (CED) that require to drive a Council vehicle and therefore require to have a licence to undertake their role. Within Education Services (EDU), certain posts within the Technician Support Service require employees to hold a driving licence. Line managers are responsible for ensuring that annual checks are carried out to verify the ongoing validity of these licences. For Financial Services (FS), we were advised that there are limited roles who require a driving licence and that these all sit within Catering and Facilities Management (CFM). Currently there is no ongoing central monitoring of driving licences within CFM. Ongoing monitoring of driving licences is undertaken centrally within Social Work Services (SWS), and Neighbourhoods, Regeneration and Sustainability (NRS). However, through our sample testing, we found officers within NRS who require driving licences for their role that were not included in the recent check which shows that the control is not operating as expected and current arrangements could be strengthened.
- 3.7 An action plan is provided at section four outlining our observations, risks, and recommendations. We have made four recommendations for improvement. The priority of each recommendation is:

Priority	Definition	Total
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	3
Medium	Less critically important controls absent, not being operated as designed or could be improved.	1
Low	Lower level controls absent, not being operated as designed or could be improved.	0
Service Improvement	Opportunities for business improvement and/or efficiencies have been identified.	0

- 3.8 The audit has been undertaken in accordance with the Global Internal Audit Standards in the UK public sector.
- 3.9 We would like to thank officers involved in this audit for their cooperation and assistance.
- 3.10 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

4 Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Mandatory training requirements are documented, and staff have completed training as expected.				
1	Although a Corporate training matrix for all Services was developed in 2017 that outlines the mandatory and desirable training courses, refresh periods and job titles of staff who should complete the courses, the document is out date and still notes Services that no longer exist, e.g. – Development and Regeneration Services. The existence of the document was also not known by most officers who were spoken to during the course of the audit, and it is unclear who has responsibility for reviewing/updating the document. SWS had a separate training matrix, however this document was also out of date and had not been updated since 2022. It was found that FS has a separate agreed list of mandatory courses for all staff that was approved by the Financial Services Leadership Team, however this relates to the Service as a whole and does not include the mandatory courses that would be required for specific roles. As there is no complete and up to date list of mandatory training, we were unable to	A Corporate Training Owner should be established who will be responsible for driving better Council wide compliance and organisation around training. This could include identifying a single source system that can be used to record and manage training records. Thereafter all Services management should identify resource within their Service and in conjunction with the appointed Corporate Training Owner should: • Agree and document the roles and responsibilities in relation to the completion, monitoring and reporting of mandatory training. • Review and update the training matrix to ensure that it is up to date and fully complete for all Services. This should include any refresh periods. Thereafter the training matrix should be communicated to all relevant staff and reviewed regularly to ensure that it remains fit for purpose. • Use the completed training matrix to identify any gaps in completion of mandatory training courses. Thereafter all training completed should be recorded in the training system identified and	High	Response: CED – Accepted FS – Accepted NRS - The Service accepts the recommendation and will work with the Corporate Training Owner, once appointed, to support improved Council-wide compliance, monitoring and reporting of mandatory training. The Service will also identify appropriate resource to support implementation of the agreed actions, including the review of training requirements and local arrangements for recording and monitoring completion. SWS – The SWS training matrix is currently under review to align with role and remit responsibilities as well as changes to practice, policies and legislation, and will be presented to Social Work Professional Governance when complete. Following appointment

No.	Observation and Risk	Recommendation	Priority	Management Response
	undertake detailed sample testing. However, as the Information Security GOLD training is mandatory for all staff within the Council, we sought to confirm the completion rates for this course. As at 30 April 2026, the completion rates were as follows: CED (88%), EDU (78%), FS (93%), SWS (88%) and NRS (77%). Information Security completion rates are currently reported to the Extended Information Security Board. We were advised that line managers are responsible for ensuring that all relevant training is undertaken by staff and that any training completed is sent to Customer and Business Services (CBS) for recording, however this is not defined anywhere. The current arrangements mean that completion of mandatory training cannot be effectively monitored and reported, increasing the risk that staff are not suitably trained to undertake their role.	monitored regularly to ensure that all training remains valid. Ensure that mandatory completion rates are reported to senior management on a regular basis and that steps are taken to improve completion rates where these are lower than expected.		of the Corporate Training Owner role, SWS will work collaboratively to implement the required actions within the Service, including clarifying roles and responsibilities, identifying compliance gaps and supporting reporting arrangements. EDU - Accepted. Once the Corporate Training Owner has been appointed, Education Services will work with them to ensure that all roles and responsibilities are carried out and comply with any system used to record and manage training records. Officer Responsible for Implementation: CED – Head of Corporate Health & Safety, Resilience and Asset Management FS – Head of Executive Compliance NRS - Divisional Director – Finance and Transformation SWS – Service Manager, Learning & Development EDU – Strategic HR Manager

No.	Observation and Risk	Recommendation	Priority	Management Response
				Timescales for Implementation:
				CED – 31 March 2027
				FS – 31 March 2027 - Dependant on Corporate Training owner being appointed
				NRS - 31 July 2027 – Dependant on Corporate Training owner being appointed
				SWS – 30 September 2027 – Dependant on Corporate Training Owner being appointed
				EDU – 31 July 2027 – Dependant on Corporate Training owner being appointed

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: The arrangements in place for verifying and monitoring qualifications and memberships are documented.				
2	Although the Corporate Recruitment Toolkit provides guidance on the initial verification of qualifications and memberships, the guidance does not include the arrangements for the ongoing monitoring of these. We also found that although CBS is involved in the recruitment process undertaken for teachers, including the verification of qualifications and memberships, the roles and responsibilities of both EDU and CBS are not clearly documented. Where processes are not documented or procedures are incomplete, there is an increased risk that staff are unclear on the processes they should follow which may lead to steps being missed.	Management should ensure that the Corporate Recruitment Toolkit is updated to include officers' roles and responsibilities for the recruitment of teachers and the arrangements for the ongoing monitoring of qualifications and memberships. Thereafter, the Toolkit should be reviewed regularly, updated as necessary, and be communicated to all relevant staff.	Medium	Response: Accepted Officer Responsible for Implementation: Director of Communication and Corporate Governance Timescales for Implementation: 31 March 2027

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Staff have the required qualifications and professional memberships to undertake their role.				
3	Service HR contacts advised that recruiting managers, with advice from HR, use the job profiles alongside existing job specifications to establish the mandatory qualifications for a role. Through review of a sample of 147 employees, we sought to confirm that the employee had the required qualifications and membership to undertake their role. We found the following: From a review of the employees EDRMS HR file, we confirmed that evidence of the employees qualification had been obtained by the recruiting manager in 81(55%) instances. However, it was noted through discussion that EDRMS was implemented during a period of 2014-2016 and as such, some historic cases have not been uploaded to EDRMS. For 60 of the employees within the sample, their start date was before the end of 2016 therefore it is possible that these records are held locally. The auditor investigated the cases where there was non-compliance for staff who joined after 2016. For five of the six cases, evidence of the qualification was	All Services: In conjunction with recommendation 2, management should establish processes to ensure that all staff have the required qualifications and professional memberships to undertake their role. Evidence of these should be retained for future reference and any expiry dates/recurring memberships monitored to ensure that the qualification/membership remains valid. Management should consider uploading all hard copy files relating to qualifications and professional memberships to the employees EDRMS HR file to ensure that a central record is held for future reference.	High	Response: CED – Accepted FS – Accepted NRS - The Service accepts the recommendation and will establish clear processes to ensure that staff hold the required qualifications and professional memberships for their roles. Evidence will be retained centrally where appropriate, with expiry dates and recurring memberships monitored to ensure ongoing compliance. The Service will also review existing hard copy records and consider uploading relevant documentation to EDRMS to support a consistent central record for future reference. SWS – When recruiting to posts with essential qualifications, the Social Work Recruitment Team filters out candidates who do not hold the required qualification, ensuring that Recruiting Managers only progress suitably qualified candidates who meet the essential criteria to interview. The Social Work Recruitment Team uses recruitment

provided. For the remaining case (SWS), evidence of the relevant qualification could not be provided.

Of the 147 employees within the sample, 124 of these required to have a professional membership. We confirmed that 121 employees had valid memberships. For the remaining three, one employee was on long term sick, and their membership had expired during their absence (NRS - Electrician). One employee was an affiliate member rather than a certified member and we were advised that the staff member would be rectifying this (CED – Senior Health and Safety Advisor). For the remaining employee, no response was received by their line manager in relation to the employees membership status (NRS - Planner).

There is therefore an increased risk that staff may not be appropriately qualified and hold the relevant membership for the role they are undertaking.

trackers for successful candidates, which include a record of essential qualifications. This enables the team to ensure that all required pre-employment checks, including qualification verification, are completed before a start date is arranged. Qualification certificates are saved to EDRMS. We are not aware of any qualifications that require ongoing renewal or have expiry dates.

In relation to professional memberships, managers are responsible for monitoring these within their own services. HR play a role in SSSC registration. As part of pre-employment checks, the Social Work Recruitment Team checks successful candidates against the SSSC Register to ensure they are not barred from registration. Once employees are in post, they are required to apply for registration within three months and achieve full registration within six months. There is currently no formal process in place to monitor this, however The Social Work Recruitment Team will implement a process to monitor SSSC registration and ensure that employees achieve full registration within the required six month period. The Employee Relations HR Team

endorses applications through the employer portal on the SSSC website and receives notifications from SSSC where there are issues with an individual's registration, including where they may be removed from the register, which are followed up with the relevant service. The team also carry out audits of SSSC registration. This has not been done to a set timetable in recent months. Audits will be carried out every six weeks, next one will be due w/b 24 August, with any issues identified followed up with the relevant service/employees. We are unable to save SSSC registrations to EDRMS. However, once the Social Work Recruitment Team implements the six month registration monitoring process, SSSC registration numbers will also be provided to CBS for recording on SAP.

EDU – Accepted. Education do not appoint people unless they hold the necessary qualifications and professional memberships.

Teachers are checked on an ongoing basis for GTCS registration.

A process will be put in place to ensure that people continue to be

members of the professional body if it is a requirement for their role.

Officer Responsible for Implementation:

CED – Head of Corporate Health & Safety, Resilience and Asset Management

FS – Head of Executive Compliance

NRS - Divisional Director – Finance and Transformation

SWS – Senior HR Officer and Principal Officer

EDU – Strategic HR Manager

Timescales for Implementation:

CED – 31 March 2027

FS – 31 March 2027

NRS – 31 July 2027

SWS – 05 February 2027

EDU – 31 July 2027

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Relevant staff hold valid driving licences.				
4	Although all Services had a document in place that outlines the arrangements for checking driving licences, we found that all documents had not been reviewed/updated in a number of years and were not well known by staff. The requirement to hold a driving licence is detailed within the relevant job profile/specification. As part of the sample testing, there were 41 employees who required a driving licence for their role. For 23 employees, evidence that the driving licence was verified as part of the recruitment process was provided. Of the 18 remaining, (14 NRS and four CFM), 17 of the employees joined prior to the move to EDRMS therefore it is possible that these records are held locally. NRS centrally monitor driving licences using the DVLA driving licence check facility. It is the line managers responsibility to ensure that as part of the recruitment process, a D906 form is completed by the required staff member and sent to the DVLA licence check mailbox. The completion of these forms, allow for a central list to be held. A quarterly check is undertaken against the DVLA database using a purchased tool to identify any licences that are no longer	All Services: Management should ensure that the document containing driving licence guidance is reviewed and updated to ensure that it reflects current practice and fully details the associated roles and responsibilities. The document should be communicated to all relevant staff and reviewed regularly. NRS management should ensure that: - The staff identified as part of the sample testing have a valid driving licence and that they are included in the ongoing driving licence check. - Line management is reminded of the importance of ensuring D906 forms are completed and submitted for all relevant staff. - Additional checks are introduced to ensure that all staff who require a driving licence have completed the D906 form to ensure that they are included in the quarterly DVLA check. CFM management should introduce central ongoing monitoring of driving licences to ensure that staff who are required to drive as part of their role continue to hold a valid driving licence.	High	Response: CED - Accepted FS – Accepted CFM - CFM will develop a process for the ongoing monitoring of driving licences to ensure staff required to drive for their role continue to hold a valid licence. NRS – The Service accepts the recommendation and will strengthen the current arrangements and controls for driving licence and D906 monitoring. A formal action plan will be implemented to ensure that all staff required to drive as part of their role, including those identified within the sample have a valid driving licence, have completed a D906 form, and are included in the ongoing quarterly DVLA checks. We will review and update the NRS driving licence guidance to clearly define the roles and responsibilities of employees, line managers, CBS administration and the central monitoring team, including the

valid or who have been subject to bans or suspensions. To confirm the strength of this control, we compared the sample of drivers selected as part of our review against the January DVLA check spreadsheet to confirm that they were included in the quarterly check. From this, we found that although evidence of the driving licence check had not been retained in the NRS employees EDRMS HR file in the 14 instances, these officers were included in the January return which means a D906 form had been completed by the employee. However, we did find 11 officers who despite having evidence of the driving licence check in their file, were not included in the January return therefore a D906 form had not been completed. As a result of this finding, management requested that these officers complete and return the D906 form, to date, eight of these officers have returned the form.

Currently there is no ongoing central monitoring of driving licences within CFM, it is the responsibility of the manager to do this annually in line with the Health and Safety management standard.

SWS undertake a similar process to NRS, however this is done six monthly as it is undertaken manually as they have not procured the same tool to integrate with the DVLA database. For the most recent

requirement for D906 completion and renewal monitoring.

SWS – Transport Management Standard will be updated.

EDU – Accepted. The driving licence document will be reviewed and reissued to all staff.

Officer Responsible for Implementation:-

CED – Head of Corporate Health & Safety, Resilience and Asset Management

FS - Head of Executive Compliance

CFM - Operations Support Manager

NRS - Head of Fleet Asset Management

SWS - Transport Coordinator and Area Operations Manager

EDU – Strategic HR Manager

Timescales for Implementation:

CED - 31 March 2027

FS – 31 January 2027

check at the time of the audit (August 2025), all staff sampled were included in the check spreadsheet.

The current arrangements increase the risk that officers do not have a valid driving licence, despite driving as part of their role.

CFM – 31 January 2027

NRS - Immediate action to resolve the audit sample findings. 31st October 2026 for remaining actions.

SWS - 30 September 2026

EDU – 31 July 2027