

Audit Committee

Wednesday 2 March at 4.30pm Via Zoom

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AUDIT COMMITTEE

The Thirty-second meeting of the Audit Committee will be held on Wednesday 2 March 2022 at 4.30pm by Zoom.

AGENDA

22.01 22.02	Welcome and Apologies Declarations of Interests			D Watt D Watt
Minutes of	Previous Meeting			
22.03	Draft Minute of the Audit Committee meeting 24 November 2021	Р	D	D Watt
22.04	Matters Arising – Action Grid	Р	D	D Watt
Items for E	Discussion/Decision			
Systems o	f Internal Control			
22.05	Internal Audit Plan 2021/22 Progress Report	Р	D	Henderson Loggie
22.06	Internal Audit Report (i) Finance – debtors/income (ii) Staff Development (iii) Student Recruitment and Retention	Р	D	Henderson Loggie
22.07	Cyber Security Update	Р	D	S Renton
22.08	Data Protection Update	P	D	M Wood
Governand	ce and Risk Management			
22.09	Review of Policies	Р	D	K Mavor
22.10	College Strategic Risk Register	Р	D	J Vincent
Items for I	nformation/Noting			
22.11	Internal and External Audit Rolling Action Plan	Р	ND	T Elliott
22.12	Audit Scotland Fees	Р	ND	T Elliott
22.13	Audit Committee Schedule of Work 2021/22	Р	D	K Mavor
22.14	Any Other Business			D Watt

Date of next meeting: 25 May 2022 at 4.30pm. Location TBC

AUDIT COMMITTEE MEETING

Date of Meeting 2 March 2022

Paper Title Internal Audit Plan 2021/22 Progress Report

Action Information

Prepared by Henderson Loggie, Internal Auditors

Agenda Item 22.05

Status Disclosable

1. PURPOSE OF THE REPORT

1.1 The purpose of this report is to provide a summary of the progress against the Internal Audit Plan for 2021/22, as being completed by Henderson Loggie.

2. ACTION FOR THE BOARD

2.1 Members of the Audit Committee are invited to note this paper.

3. BRIEF BACKGROUND INFORMATION

3.1 The attached shows the planned timescales for reporting to the Audit Committee for each of the audit areas within the 2021/22 Internal Audit Plan.

4. SUPPORTING DOCUMENTATION/ FURTHER INFORMATION

4.1 The Internal Audit Plan 2021/22 Progress Report is attached at Annex 22.05A.

RISKS

5.1 There are no specific risks associated with this paper.

6. ANY OTHER SIGNIFICANT IMPACT e.g STUDENT EXPERIENCE/ LEGAL / FINANCIAL / EQUALITY& DIVERSITY.

6.1 The College is required to have an internal audit function undertaken each year as part of the Financial Memorandum.

Glasgow Clyde College

Internal Audit Progress Report

Audit Committee - 2 March 2022

Issued: 22 February 2022





Internal Audit Progress Report March 2022

Progress in delivering the annual plan for 2021/22 is shown below.

Audit Area	Planned reporting date	Report status	Report Number	Overall Conclusion	Audit Committee	Comments
Annual Plan 2021/22	November 2021	Draft 09/11/21 2 nd Draft 10/11/21 3 rd Draft 17/11/21 Final 22/02/22	2022/01	N/A	24/11/21	
Student Recruitment and Retention	March 2022	Draft 18/02/22 Final 21/02/22	2022/02	Good	02/03/22	
Staff Development	March 2022	Draft 20/02/22 Final 22/02/22	2022/03	Satisfactory	02/03/22	
Teaching Staff Utilisation BPR	May 2022					Fieldwork scheduled for week commencing 21/03/22
Space Management / Room Utilisation	May 2022					Fieldwork scheduled for week commencing 21/03/22
Debtors / Income	March 2022	Draft 18/02/22 Final 21/02/22	2022/04	Good	02/03/22	
Business Development	May 2022					Fieldwork scheduled for week commencing 14/03/22



Audit Area	Planned reporting date	Report status	Report Number	Overall Conclusion	Audit Committee	Comments
Follow-Up Reviews	September 2022					Fieldwork scheduled for week commencing 06/06/22
Credits	November 2022					Fieldwork will be conducted in September 2022
Student Support Funds	November 2022					Fieldwork will be conducted in September 2022

Gradings are defined as follows:

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





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AUDIT COMMITTEE MEETING

Date of Meeting 2 March 2022

Paper Title Cyber Security Update - Cyber Essentials Certification

Action Information

Prepared by Scott Renton, Head of ICT

Agenda Item 22.07

Status Disclosable

1 PURPOSE OF THE REPORT

1.1 To provide an update on the progress of the College's certificate status for Cyber Essentials and Cyber Essentials Plus.

2 ACTION FOR THE BOARD

2.1 Members of the Audit Committee are invited to discuss this paper.

3 BRIEF BACKGROUND INFORMATION

3.1 The Scottish Government requires all Public Bodies to have Cyber Essentials Certification and Cyber Essentials Plus Certification or provide similar assurance. To this end, the College previously agreed to pursue Cyber Essentials Plus standard. The certificate process is to first achieve Cyber Essentials (CE) through a self-assessment questionnaire, and then Cyber Essentials Plus (CE+) where an external security company examines and tests your network infrastructure to the required standard. This is an annual re-certification process.

4 CURRENT STATUS

- 4.1 By the date of the Audit Committee on 2 March 2022 we are expecting to have achieved Cyber Essentials Certification. This has taken longer to achieve due to the number of student PCs in the College that have not been in use for a significant period of time, due to the pandemic, and requiring ICT staff to manually turn on all the devices and schedule the required security updates. We are nearing the end of this process and expect to submit our CE self-assessment to our chosen CREST (Council for Registered Ethical Security Tester) accredited supplier by the end of February 2022.
- 4.2 Following on from achieving Cyber Essentials we will be scheduling the next stage with our CREST supplier for the on-site network testing in order to achieve CE+. The College is aiming to achieve CE+ by April 2022 or earlier.

5 RISKS

- In light of the continued progress towards re-certification of CE and CE+, the College has not identified any specific risk implications in respect of this paper.
- 5.2 Furthermore, it is important to highlight that, as an additional risk measure, from December 2021 the College has had Cyber Insurance in place through the insurance mutual UMAL of which it is a member institution.

- 6 ANY OTHER SIGNIFICANT IMPACT e.g. STUDENT EXPERIENCE/ LEGAL / FINANCIAL/ EQUALITY& DIVERSITY
 - N/A



2022

Report for Audit Committee

GLASGOW CLYDE COLLEGE DR MAIREAD WOOD 21/02/22

HEFESTIS | mwood@hefestis.ac.uk

1. Background

Data protection continues to evolve, with changes being affected by Brexit and the publication of new frameworks including the Information Commissioner's Office (ICO) Accountability Framework and Scottish Government's Cyber Resilience Framework.

In December 2021, the college made an application for cyber security insurance. The application process highlighted the importance of data protection across the college in relation to cyber security, the IT estate, and the compliance requirements the college needed to meet for cyber security insurance purposes.

In addition to this, the HEFESTIS DPO and Head of IT met with the HEFESTIS CISO to assess the college's security posture. The Accountability Framework and Cyber Resilience Framework were brought strongly into focus, fitting hand-in-glove and alignment with these will be essential in demonstrating college compliance going forward. This again highlighted the importance of a joined-up approach across data protection, security, and IT, where it was agreed that establishing a working group would be a good idea to support college-wide compliance.

HEFESTIS are preparing guidance on alignment of the Accountability Framework and Cyber Resilience Framework which will be shared with its members. The DPO plans to support the college to complete the Accountability Framework this year once the Record of Processing Activity (ROPA) is completed (note data maps are completed).

Good progress has been made with Trade Unions regards processing data on college systems. Principal to provide update.

2. Policies and procedures

All data protection guidance and procedures were reviewed and updated during the Procedure Review in June 2021. The following updates have subsequently been made:

Guidance/Form	Updated
Data Retention Schedule	Yes – to include retention details for complaints -
	cross-referenced with SPSO
Digital Strategy	Data protection input provided (IT-owned)
Information and Data Management Policy	Data protection input provided (IT-owned)
Provision and Use of Digital Resources Policy	Data protection input provided (IT-owned)

3. Data Protection Impact Assessments (DPIA's)

Start date	DPIA Project Title	Summary	Third party involved?
9/09/21	OH Surveillance	New OH provider	Accura
29/09/21	Child Poverty	Building Better Futures –	GKC, Community
	Project	delivering training to local	Partners
		disadvantaged groups in the community	
20/10/21	Report and Support	Online system for the reporting of harassment and bullying, including gender-based violence in academic context, which supports victims.	Culture Shift and Fearless Glasgow (GCU,GU, US, UWS, RCS, GSA, GCC, AC, GKC, CoGC)
23/11/21 (update)	Canvas DPIA	No changes to Canvas (eLearning Platform)	Instructure Global Ltd (procured through APUC, with contract)

23/11/21 (update)	PowerBi (part of	Contractors no longer have	Instructure Global Ltd
	Canvas project)	access to data/systems	(procured through
			APUC, with contract)
16/11/21	Glasgow Young Asylum Social Work access to college bursary	To prevent duplicate awards being made to students	Yes – social work, Glasgow City Council
	information		

4. Privacy Notices

Privacy notices are produced to reflect new data processing activity, are frequently updated and can be found here $-\frac{Privacy\ Notice}{Useful\ Information}$ | Glasgow Clyde College.

5. Data subject requests

Subject Access Requests

REF	Date response due	Date response sent	Notes
SAR 21/05	27/08/21	20/08/21	
SAR 21/06	7/12/21	7/01/22	Response sent by
			teaching department
SAR 22/01	28/02/22		
SAR 22/02	12/03/22		Relates to 21/06

Right to be forgotten requests - NB: lots of these are autogenerated from a website. As a result, it is often difficult to verify the requestor, resulting in the cases being closed without the data being deleted.

REF	Date response due	Date response sent	Notes
RTF 21/07	25/06/21	(case closed – response sent	Additional info requested, no
		25/06/21)	response.
RTF 21/08	7/10/21	17/09/21	Clock stopped as additional info
			requested.
RTF 21/09	8/10/21	14/09/21	Clock stopped as additional info
			requested.
RTF 21/10	18/10/21	(case closed – response sent	Clock stopped as additional info
		19/10/21)	requested. No response.
RTF 21/11	6/11/21	(case closed – response sent	Clock stopped as additional info
		9/11/21)	requested. No response.
RTF 21/12	12/01/22	7/01/22	
RTF 21/13	4/02/22	11/01/22	No records held
RTF 22/01	23/02/22	22/02/22	

Third party requests

REF	Requestor	Date received	Date response	Notes
			sent	
TPR 21/02	Social work dept	23/08/21	30/08/21 -	Data not provided (agreed
			closed	after discussion with their DPO)
TPR 21/03	SAAS Counter Fraud	25/08/21	31/08/21	
TPR 21/04	SAAS Counter Fraud	6/10/21	18/10/21	
TPR 21/05	SAAS Counter Fraud	15/09/21	1/10/21	BAU via MIS

TPR 21/06	Met Police	25/10/21	9/11/21	Clock stopped
TPR 21/07	Police Scotland	26/10/21	3/11/21	Caveat that data is likelylinked
				to individual.

6. Data incidents and breaches

There have been eleven data incidents during 21/22 academic year to-date, with four breaches. None have met the threshold to report to the ICO/data subjects. The main cause of these has been human error.

Incident #	Date identified	Date(s) of Incident	Place of incident
2021-001	14/06/21	11/6/2021	SharePoint
2021-002	23/07/21	23/07/21	Email
2021-003	10/8/2021	10/8/2021	MS Teams
2021-004	16/08/21	16/08/21	Email
2021-005	21/09/21	21/09/21	Email
2021-006	20/10/21	20/10/21	MS Teams
2021-007	11/11/2021	11/11/2021	Email
2021-008	1/12/2021	8/11/2021 (est)	Library Management System (LMS)
2021-009	13/12/2021	TBC	Action for Children
2021-010	15/12/2021	15/12/2021	Email
2021-011	14/02/2022	Nov-21	JANET network

7. Arrangements with external third parties

Data sharing agreements are set-up as required. Data processing agreements (i.e. the data protection elements of contracts) are reviewed when provided to the DPO. The DPO works with Exec Team to record all agreements and contracts.

8. Staff training

The DPO has maintained good contacts with key personnel across the College to support data protection compliance. Staff can contact the DPO for data protection advice at any time, as needed. The DPO has provided details to OD of sessions being run by HEFESTIS as part of Cyber Scotland Week, 28 Feb – 6 March. All sessions are free - Events Archive - Cyber Scotland Week - Events.

Session title	Date/time	Audience
Identifying and responding to a cyber-attack	Thurs 3 March @1-2.30pm	All staff
Organisational security structures, cyber	Thurs 3 March @3.30-4.30pm	IT/security staff
maturity and risk management		
Supplier security (e.g. what to look during	Fri 4 March 2022@1-2.30pm	All staff
procurement or using an external supplier -		
due diligence), preparing for a ransomware		
attack and current trend in data protection		
and cyber security		

AUDIT COMMITTEE MEETING

Date of Meeting: 2 March 2022

Paper Title: Policies for Review

Action: Decision

Prepared by: Kirsty Mavor, Clerk to the Board

Agenda Item: 22.09

Status: Disclosable

1. PURPOSE OF THE REPORT

The purpose of this report is to ask the Committee to review and approve the policies forming Appendices 1-3 as delegated by the Board of Management at its meeting on 15 December 2021.

2. ACTION FOR THE COMMITTEE

The Committee is asked to consider each Policy in Appendices 1-4 and:-

- approve the proposed wording for policies 1.4, 1.6 and 1.7.
- note that policy 1.9 is not due for review until 2023 (a copy is provided for completeness).

3. BRIEF BACKGROUND INFORMATION

- 3.1 The Board has responsibility for a number of College policies which are subject to a programme of regular review.
- 3.2 At its meeting on 15 December 2021, the Board delegated authority to each Committee to review the policies relative to its areas of responsibility. The following policies sit within this Committee's area of responsibility:

1.3	Risk Management	Mar 2025
1.6	Information and Data Management	Mar 2025
1.7	Provision and Use of Digital Resources	Mar 2025
1.9	Information Security	Aug 2023

- 3.3 As this Committee is aware, the Unethical Behaviour and Whistleblowing Policy has recently been reviewed in conjunction with the Organisational Development Committee and the revised Policy was approved by the Board at its meeting on 16 June 2021.
- 3.4 The Board approved a revised programme staggering the dates for the next review of all policies, with the review dates for those falling under this Committee's remit, shown in the table above.

4. SUPPORTING DOCUMENTS/ FURTHER INFORMATION

Appendix 1: Policy 1.3 Risk Management

Appendix 2 Policy 1.6 Information and Data Management **Appendix 3**: Policy 1.7 Provision and Use of Digital Resources

Appendix 4: Policy 1.9 Information Security

5. RISKS

5.1 Failure to review Board polices in a timely manner could mean that the policies fail to reflect changes to legislation or best practice which have occurred in the period since the last renewal.

6. ANY OTHER SIGNIFICANT IMPACT eg STUDENT EXPERIENCE/LEGAL/FINANCIAL/EQUALITY & DIVERSITY

Reviewing policies ensures students' interests are protected and that the College complies will all legal, financial and equality and diversity issues.



Policy 1.3

Policy Area: Board of Management

Policy Title: Risk Management

Revision No.: 2

Review Period: 3 years

Review Due: On or before March 2025

It is the policy of the Board of Management to ensure that the College's system of internal control is effective in managing risks. This system will include consideration of the following factors:

- the nature and extent of the risks facing the College, in light of the College's approved Risk Appetite;
- the extent and categories of risk which the Board regards as acceptable for the College to bear;
- the likelihood of the risks concerned materialising and the impact it would have on the College and the prospect of achieving its strategic objectives;
- the College's ability to reduce the incidence and impact on the business of risks that do materialise; and
- the costs of operating particular controls relative to the benefit thereby obtained in managing the related risks.

The Senior Leadership Team (the designated risk management group) will support, advise on and implement this policy of the Board of Management.

This Policy has been developed in line with all relevant legislation including the Equality Act 2010 and covers all individuals including, but not limited to, those with the following protected characteristics: Age, disability, gender reassignment (including gender identity and expression), marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation.



Policy 1.3

History of changes

Revision	Description	Adopted	Authorised
0	First draft	November 2013	SW
1	Policy updated and renumbered with amendments to the first and third bullet points	March 2017	Board of Management
2	Review period revised from 5 years to 3 years and third bullet point amended to refer to College's strategic objectives. Reference to legislation and Equalities Act updated.	March 2022	Audit Committee

Agenda Item 22.09A

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Policy Area: Board of Management

Policy Title: Information and Data Management

Revision No.: $\frac{23}{2}$

Review Period: 35 years

Review Due: On or before March 202<u>5</u>2

It is the policy of the Board of Management that:

- information and data related to all key College processes is processed lawfully, fairly and transparently for the purpose it was collected, is accurate and up-to-date, securely maintained, auditable and that measures are taken to ensure that only designated staff can access it;
- complete and current backups are maintained for all information systems;
- the College will <u>collect and retain only information</u> and data that is required for ongoing business purposes and that <u>extraneous</u> information is routinely destroyed in line with timescales identified in the retention schedules; and
- information and data <u>processing and retention</u>, including personal data, complies with appropriate legislation, including the Data Protection Act and the <u>UK General Data Protection Regulation and that this can be demonstrated by the College.</u>

This Policy has been developed in line with all relevant legislation including the Equality Act 2010 and covers all individuals including, but not limited to, those with the following protected characteristics: Age, disability, gender reassignment (including gender identity and expression), marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation.

This Policy has been developed with due regard to all relevant legislation.

History of changes

Revision	Description	Adopted	Authorised
0	First draft	November 2013	CMcS
1	Policy Area change from Quality and Performance to Board of Management and Policy Number change from 7.3 to 1.6. Amendment to fourth bullet point.	March 2017	Board of Management
2	Minor update to two elements to highlight General Data Protection Regulation.	May 2018	Chair of Board of Management
3	Review period revised from 5 years to 3 years. Reference to legislation and Equality Act updated.	March 2022	Audit Committee

Policy Area: Board of Management

Policy Title: Provision and Use of Digital Resources

Revision No.: $\underline{2}$ 4

Review Period: 53 years

Review Due: On or before March 202<u>5</u>2

It is the policy of the Board of Management to:

- provide employees with <u>appropriate</u> computing, networking, and information resources for use as business tools to support their efforts to meet employment related objectives;
- provide students with <u>appropriate</u> computing, networking, and information resources for use as learning tools to support their efforts to meet study related objectives;
- ensure that Glasgow Clyde College complies fully with all relevant legislation regarding the use of information technology resources including those relating to data protection;
- require that individuals who use Glasgow Clyde College's information technology resources do so in a responsible manner, abiding by all relevant procedures, laws, and regulations;
- ensure that appropriate procedures are established to enable employees and students to act in a responsible manner when using information technology resources; and
- ensure that procedures are established to revoke access to and use of information technology resources, and if appropriate, take disciplinary action, where an individual fails to comply with relevant procedures, laws, and regulations.

This Policy has been developed in line with all relevant legislation including the Equality Act 2010 and covers all individuals including, but not limited to, those with the following protected characteristics: Age, disability, gender reassignment (including gender identity and expression), marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation.

This Policy has been developed with due regard to all relevant legislation.

History of changes

Revision	Description	Adopted	Authorised
0	First draft	November 2013	BH
1	Policy 'Management of ICT' retitled 'Provision and Use of Digital Resources', Policy Area change, from ICT to Board of Management and Policy Number change from 8.1 to 1.7.	March 2017	Board of Management
2	Review period revised from 5 years to 3 years. Reference to legislation and Equality Act updated.	<u>March 2022</u>	Audit Committee

Policy Area: Board of Management

Policy Title: Information Security

Revision No.: 0

Review Period: 5 years

Review Due: On or before August 2023

1.0 Introduction

1.1 It is the policy of Glasgow Clyde College that all information it manages shall be appropriately secured to protect against the consequences of breaches of confidentiality, failures of integrity or interruptions to the availability of that information.

2.0 Purpose

- 2.1 This Information Security Policy provides management direction and support for information security across the College.
- 2.2 The College collects, processes, stores and uses information, including personal and special category 'sensitive' data, as part of its academic and business processes.
- 2.3 Information may be managed through electronic formats or manual paper based systems.
- 2.4 In all cases the College needs to ensure that adequate controls are in place so that information is appropriately available as required, is accurate, secure, and complies with legislative requirements.

3.0 Scope

- 3.1 The scope of this Information Security Policy extends to all Glasgow Clyde College's information including but not limited to:
 - Records related to prospective, current and past students and staff including emergency and next of kin contact information;
 - Records related to workers employed through temping agencies, members of the Board, visitors, customers, and external contractors;
 - Teaching and learning data;
 - Financial records and information:
 - HR and Organisational Development data;
 - Operational plans, account records and minutes;
 - Executive level data;
 - Student Association data:
 - Commercial and Business Development data;
 - Quality and Performance data;

- Intellectual Property data; and
- External Funding records.

4.0 Policy Statement

- 4.1 Glasgow Clyde College aims, as far as reasonably practicable, to:
 - Protect the confidentiality, integrity and availability of all data it holds within its systems by implementing appropriate technical and organisational measures to ensure a level of security appropriate to the risk. This includes the protection of any device that can carry data or access data, as well as protecting physical paper copies of data wherever possible;
 - Take a data protection by design and default approach to any new data processing, including the use of new technology, to identify any risks by firstly carrying out a Data Protection Impact Assessment supported by the Data Protection Officer;
 - Meet legislative and contractual obligations as required under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003;
 - Protect the College's intellectual property rights;
 - Produce, maintain and test business continuity plans particularly with respect to data backup and recovery;
 - Prohibit unauthorised use of the College's information and systems;
 - Communicate the requirements of this Information Security Policy and the information security aspect of procedures to all persons potentially accessing data as part of their role as appropriate to the data accessed;
 - Provide information security training to all persons appropriate to their role; and
 - Report any breaches of information security, actual or suspected to the Data Protection Officer (DPO) in a timely manner noting that where a significant breach has occurred, the College has to report this to the Information Commissioner's Office within 72 hours.

5.0 Responsibilities

- 5.1 This policy covers all data access and processing within the College and through remote or mobile working.
- 5.2 All College members (students, staff, and Board members) must be familiar with this policy and any appropriate supporting documentation relevant to their role.

- 5.3 This Policy should be read in conjunction with the College's Information and Data Management Policy, College Guide to Data Protection and Data Security Staff Do's and Don'ts Guidance, and should be communicated to all users and relevant external parties.
- 5.4 The Senior Leadership Team is ultimately responsible for establishing the framework and for issuing and reviewing policy statements and procedures to support Glasgow Clyde College with which members of the College must comply.
- 5.5 The Senior Leadership Team requires the Assistant Principal in each area, in conjunction with their Heads of Curriculum or Unit or Unit Manager, to be accountable for implementing an appropriate level of security control for the information owned by that department and processed by persons accessing that data. This includes undertaking a Data Protection Impact Assessment where a type of processing, in particular using new technologies, is likely to result in a high risk to the rights and freedoms of natural persons.
- 5.6 Each person is accountable to their Head of Curriculum / Unit or Unit Manager as applicable for operating an appropriate level of security control over the information and systems they use to perform their duties.
- 5.7 The Head of ICT is responsible for the overall coordination of the management of information security, maintaining this Information Security Policy and providing advice and guidance on its implementation. All staff have responsibility for adhering to information security requirements within their area. It is noted that failure to adhere to this Policy may result in the College suffering financial loss, operational incapacity, and / or loss of reputation. Data access or processing that fails to observe the provisions of this Policy may result in disciplinary action.
- 5.8 The Data Protection Officer is responsible for monitoring compliance with the GDPR, Data Protection Act 2018 and other relevant legislation, and College policies, and providing advice on data protection impact assessments in relation to the protection of personal data, including the risk associated with processing operations in relation to information security.
- 5.9 Glasgow Clyde College has a responsibility to abide by and adhere to all current UK and EU legislation as well as a variety of regulatory and contractual requirements and agreements.

6.0 Supporting Policies, Codes of Practice, Procedures and Guidelines

- 6.1 Supporting policies have been developed to strengthen and reinforce this Policy statement.
- 6.2 All staff, users, any third parties authorised to access the College's network or computing facilities are required to familiarise themselves with these supporting documents and to adhere to them in the working environment as far as they relate to their role within the College:

Supporting policies:

- 1. Policy 1.6 Information and Data Management
- 2. Policy 1.7 Provision and Use of Digital Resources

Information Security Procedures and Guidelines:

- 3. Staff ICT Acceptable Use Agreement
- 4. Student ICT Acceptable Use Agreement
- 5. Use of ICT Resources Procedure
- 6. ICT Password Guideline
- 7. College ICT Encryption Guideline to be finalised
- 8. Social Media Guideline
- 9. Use of ICT Legal Constraints Guideline to be finalised

Data Protection Procedures and Guidelines:

- 10. Data Protection Guidelines
- 11. College Data Privacy Notice (on website)
- 12. Data Subject Request Procedure
- 13. Data Protection Impact Assessment
- 14. Data Breach Reporting Procedure
- 15. Data Retention Schedule

This Policy has been developed with due regard to all relevant legislation.

History of changes

Revision	Description	Adopted	Authorised
0	First draft prepared with input from HE and FE Shared Technology and Information Services	Board of Managment	August 2018

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AUDIT COMMITTEE

Date of Meeting 2 March 2022

Paper Title College Strategic Risk Register

Action For Noting

Prepared by Jon Vincent, Principal & Chief Executive

Agenda Item 22.10

Status Disclosable

1 PURPOSE OF THE REPORT

1.1 This report considers the College's Strategic Risk Register which is updated regularly and reported to the Audit Committee and the Board of Management on a quarterly basis.

2 ACTION FOR THE BOARD

2.1 Members are invited to note this paper.

3 BRIEF BACKGROUND INFORMATION

3.1 The College's Strategic Risk Register as at 16 February 2022 is attached. The Strategic Risk Register is updated regularly and considered at least quarterly by College senior management. The changes since last reported to the Board in December are highlighted in red.

4 SUPPORTING DOCUMENTATION/ FURTHER INFORMATION

- 4.1 The College's Risk Appetite as last reviewed by the Board in October 2020 is Open where open is defined as being willing as an organisation to consider all potential delivery options and choose the one that is most likely to result in successful delivery while also providing an acceptable level of reward. The risk appetite process is based on the HM Treasury of Management method.
- 4.2 There is a column now included in the Risk Register which shows the comparison of the residual risk score for each risk against the risk appetite scoring mapping, and indicates where the risk score is higher than, equal to or lower than the College Risk Appetite of Open (which is the score range of 15 to 19 for the residual risk).
- 4.3 Overall, there are three risks where the risk score has increased following the latest review, they are:



F1 – Failure to achieve contracted overall teaching delivery targets for any partner (SFC/SDS/ESF)

The College is now forecasting underachieving its SFC credit target by circa 2% however it is unclear if the SFC will operate its clawback mechanism at the end of 2021/22. The College (and sector) have been significantly impacted by restrictions imposed on its operations because of the Covid-19 pandemic. These restrictions have had a limited impact on recruitment but a more profound impact on student retention, this is a common picture across the Scottish college sector. The College had a very positive January 2022 recruitment campaign which has contributed to an improving situation in comparison to that report to the Board of Management in December 2022. Discussions are ongoing between the sector, SFC and Scottish Government regarding the financial impact on colleges of under-performance against contracted delivery targets and consequences for financial sustainability. At a local level the College is in regular contact with GCRB.

F4 - Adverse funding changes in 2021/22 (SFC/SDS/ESF) and future years

Due to a reduction in UK Government Covid-19 consequential funding to the Scottish Government the flexibilities on college funding contracts employed in 2019/20 and 2020/21 have not yet been confirmed for 2021/22. Discussions are on-going between the sector, SFC and Scottish Government about the potential impact on the college sectors financial stability. At a local level the College is in regular contact with GCRB. The Scottish Government has published its draft budget for 2022/23 and have planned for a 'flat-cash' settlement for the college sector. Colleges Scotland have calculated that the settlement will resulted in a circa £52m 'real-terms' cut to college sector income due to inflationary pressures, pay settlement increases, National Insurance rises and the end of Covid-related funding initiatives. Based on these calculations the income reduction for Glasgow Clyde College would be circa -£2m in 2022/23. The 5yr financial forecast is currently being updated and will be presented to the next meeting of the Board's Finance & Resources Committee on 9 March 2022.

O2a – Negative impact on employee relations at a national level (e.g. national bargaining, industrial action

EIS-FELA have formally notified the Employer Association that they are in dispute because the employers' have failed to '...make a reasonable pay offer in the 2021-22 NJNC National Pay Negotiations.' EIS-FELA have enacted a consultative industrial action ballot that opened on Friday 11 February 2022. Traditionally, support for national industrial action at the College has been high.



The national pay negotiations with the support staff trade unions for the 2021/22 period is currently on-going. A final offer has been made by the employers and the unions are currently considering it.

4. The Board's approach to Risk Appetite was discussed at the October Audit Committee who were comfortable with the approach adopted at this stage however there was a discussion at that Audit Committee on whether it was the most appropriate to use the same risk appetite level across each risk area.

A workshop was held on 14 January 2022 involving College senior managers and Board members. The workshop considered how risk scoring and the risk appetite could be re-considered including the possibility of introducing different risk appetite levels across the different risk areas. In addition, the workshop reviewed the Risk Register in detail against the Strategic Plan themes and it was agreed that the key risks should be mapped against the objectives contained in the Plan. Finally, because of the detailed discussion it was agreed that a comprehensive review of the current risks was required with the likelihood that some risks will be removed, and new risks added. A further workshop was planned for February 2022 to further consider matters however it was deferred due to staff absence. The workshop will be rescheduled in March 2022.

5 RISKS

- 5.1 The College Strategic Risk Register is a key part of the College's risk management framework.
- 5.2 The College is required to have a risk register as part of the Financial Memorandum and the financial implications are detailed within the financial risks section of the College Strategic Risk Register.
- 6 ANY OTHER SIGNIFICANT IMPACT e.g. STUDENT EXPERIENCE/ LEGAL / FINANCIAL/ EQUALITY& DIVERSITY
- 6.1 Each of the risks in the College Strategic Risk Register reflect the current assessment of the key areas of College activity across the financial, organisational and governance risks, which include student experience, legal, financial, and equality and diversity matters.

GLA	SGOW CLYDE CO	LLEGE - STR	ATEGIC RISK	REGISTER				Key of abbreviations: SFC = Scottish Funding Council, GCRB = Glasgow Colleges Regional Board, GCG = Glasgow Colleges Group, SDS = Skills Development Scotland, ESF = European Social Fund, JISC = Joint Information Steering Committee, FWDF = Flexible Workforce Development Fund, VLE = Virtual Learning Environment, DELTA project = Delivering Excellence in Learning, Teaching and Assessment, VPN = Virtual Private Network			Averse, 7	Risk Appetite Residual Score 9 =Minimalist, 10-14 = Caut 20-25 = Hungry			as at 16th	February 202
					Score	e Before M Actions				Score Af	fter Mitigati	ng Actions		•		
Risk Ref	Risk Description	Risk Category	Link to Strategic Plan Themes	Risk Owner	Proba bility	Impact	Risk Score	Mitigating Actions	Probabi ty	li Impact	Risk Score	Score compared to College risk appetite (see key above)	Risk Ranking after mitigating actions	Short / Medium/	Risk Score at last report to the Board	Risk Increasin Decreasing/ N Change
Fina	Incial Risks															
F1	Failure to achieve surplus targets for commercial activity/Failure to achieve/maintain planned levels of non-SFC income	Financial / COVID impacts	Theme 2 and 5 - Partner of Choice and Financial Resilience through Operational Excellence	Assistant Principal International and Business Development	5	ţ	5 25	Short term i) Revised commercial income/surplus plan now for 2021/22 and plan to rebuild for future years by each sector area based on medium and long term impacts following COVID 19 virus. ii) FWDF key element of total activity and increased level during 2021/22 utlisiing CBI support to promote FWDF to larger companies. iii) Greater use of digital marketing to promote course areas as effectively as possible Long Term iv) Regular monitoring between Business Development Unit, External Funding Unit and Faculty Management of commercial activity/non-SFC activity and future replacement activity will be identified as far as can be estimated however significant impacts from COVID through 2020/21 at least. v) Pipeline of activity being re-established as much as possible based on on-line or on-site delivery vi) Costing templates completed for all commercial activity. In year staff costs transfers of permanent staff costs. vii) Increased engagement and marketing effort during COVID to try to maintain as much of business as possible and to open and grow new income streams e.g. for retraining. viii) Spread of activity across a range of activity areas to reduce risk of one large contract failure to overall surplus. ix) Review and develop market opportunities through business development strategy and growing new markets. x) Keep informed of constitutional change implications of Brexit and impact on non-SFC activity for the College. Involvement in College sector Brexit forum.		4 :	5 2	0 Higher than risk appetite (Hungry)	F1	Short	20	No change
F2	Failure to achieve contracted overall teaching delivery targets for any key partner (SFC/SDS/ESF)	Financial/ Organisationa I/ COVID impacts	Theme 2 and 3 - Partner of choice and Unrivalled Student Experience	Deputy Principal	5	2	20	as possible. Short Term i) Regular analysis and reporting of progress against SFC credits target for teaching delivery which is discussed at each Senior Leadership Team and Curriculum Assistant Principals meetings. ii) Continue to seek clarity on different SFC credits streams for 2021/22 & impacts for College iii) Focussed support for students to deliver student experience and to ensure stated teaching activity targets are met. iv) Closely monitor tuition fees income to assess potential COVID impacts on income Long Term iv) Annually plan and deliver portfolio to required quality standards, ensuring appropriate recruitment, and improved retention of students. v) Discussions within Glasgow Colleges Group and with other partners to plan curriculum and make changes annually to meet market needs and Government and SFC guidance vi) Work closely with relevant partners to ensure programmes implemented as planned vii) Aim to ensure annually all relevant agency (e.g. SDS) milestones and documentation requirements achieved viii) College undertake effective competitor analysis, clear branding and focused marketing to maintain effective student recruitment. Again significant COVID impacts on ongoing basis.		5	5 2	5 Higher than risk appetite (Hungry)	F2	Short	20	Increasing
F3	Failure to reduce College cost base on managed basis to meet requirements of the three year financial forecast	Financial/ Organisationa I/ COVID impacts	Theme 5 - Financial Resilience through Operational Excellence	Principal/ Deputy Principal & Vice Principal	5		5 25	Short Term i) Revenue budget approved for 2021/22 ii) Cost reduction plan implemented in 2020/21 with reduction in staff levels and significant cuts in non-staff budgets across the College. VS Reductions and academic management restructure implemented. Long Term iii) Process of review of all areas to seek cost reductions, as well as seeking further efficiency through improved business processes. iv) First staff restructure from October 2019 through use of VS scheme with required agreement with GCRB and SFC. v) Successful bid to GCEF for additional funding support from November 2020. vi) Discussion on future potential changes being taken forward. vii) Zero based budgeting from 19/20 onwards for non-staff costs. viii)Three year Financial Forecast Return approved by the Board of Management and submitted to SFC		33	5 1	5 As per Risk Appetite (Open)	F3	Medium	15	No chang

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Risk Ref	Risk Description	Risk Category	Link to Strategic Plan Themes	Risk Owner	Proba bility	Impact	Risk Score	Mitigating Actions	Probabili ty	i Impact	Risk Score	Score compared to College risk appetite (see key above)	Risk Ranking after mitigating actions	Short / Medium/ Long Term	Score at last	Risk Increasing Decreasing/ No Change
F4	Adverse Funding changes in 2021/22 (SFC/SDS/ ESF) and future years	Financial / COVID Impacts	Theme 5 - Financial Resilience through Operational Excellence	Principal/ Deputy Principal & Vice Principal	4	4 .	5 20	Short Term i) Financial plans developed by College Senior Leadership Team and monitored within framework of available activity through Glasgow Regional funding for teaching, student support funds and capital. Portfolio planning key element of cost base and monitored on ongoing basis. Portfolio for 2020/21 being monitored with blended/ on line activity where possible. ii) College working to achieve Flexible Workforce Development Fund target levels however this was impacted by COVID 19 arrangements and number of the related areas now moved to on line delivery. iii) SFC Funding allocations for 2021/22 now finalised. Long Term iv) Continue to aim to inform and influence funding allocations through Principals' Forum, Glasgow Colleges Regional Board, MSPs, and other appropriate bodies. v) Work with Colleges Scotland and Scotland's Colleges Partnership on lobbying regarding impact on ESF funding and development of future alternative resources. Closely monitor ESF delivery levels and suitable record keeping. vi) Projects progressed to address priority items as per College Capital masterplan based on affordability.	4		5 21	Higher than Risk Appetite (Cautious)	F4	Medium	12	Increasing

GLA	SGOW CLYDE CO	LLEGE - STR	ATEGIC RISI	K REGISTER	Score	e Before Mi	tigating	Key of abbreviations: SFC = Scottish Funding Council, GCRB = Glasgow Colleges Regional Board, GCG = Glasgow Colleges Group, SDS = Skills Development Scotland, ESF European Social Fund, JISC = Joint Information Steering Committee, FWDF = Flexible Workforce Development Fund, VLE = Virtual Learning Environment, DELTA project = Delivering Excellence in Learning, Teaching and Assessment, VPN = Virtual Private Network	=	Score Afr	Averse, 7	r Risk Appetite Residual Score (7-9 = Minimalist, 10-14 = Cauti 20-25 = Hungry			as at 16th	h February 2022
Risk Ref	Risk Description	Risk Category	Link to Strategic Plan Themes	Risk Owner		Actions		Mitigating Actions	Probabil ty	ii Impact	Risk Score		Risk Ranking after mitigating actions	Risk Timing Short / Medium/ Long Term	Score at last	Risk Increasing Decreasing/ No Change
Orga	nisational Risks															
01	Failure of College operational processes/ systems/ ICT infrastructure including risk of cyber attack or fraud	Organisationa I/ COVID impacts	Theme 5 - Financial Resilience through Operational Excellence	Vice Principal Resources & College Development & Deputy Principal	4	5	20	Short Term i) Monitoring systems in place across College and feedback from relevant staff. Any issues addressed as necessary and action taken. Plans ensure key systems security / performance not impacted during periods of financially challenging budget. Many systems/services cloud based and using VPN/remote desktop for staff to access systems while home working. Delivered laptops and wireless devices to staff and students who need them within the available resources levels. Long Term ii) Business system improvement process in place iii) Infrastructure designed not to have single points of failure with all campuses operating a sophisticated dual-core network topology. iv) Virtualisation infrastructure which improves server resilience with two main data centres at different campuses with tape/offsite and cloud backups of critical systems. v) Member of HE/FE Shared Technology and Information Services (HEFESTIS) which provides support to secure against cyber attack and regular ICT network penetration testing undertaken by external bodies. vi) ICT backup procedures and Disaster Recovery planning. Cyber essentials+ status maintained. vii) Enterprise Malware detection and Web filtering technology and room based uninterruptable power supply in place with ICT climate monitoring facilities.		4	4 1	16 As per Risk Appetite (Open)	01	Medium	16	No Change
O2a	Negative impact on employee relations at a National level (e.g. national bargaining, industrial action)	1/	Theme 4 - Employer of Choice	Principal/ Assistant Principal HR	4	5	20	Short Term i) Focussed work with Trade Unions, specific and regular meetings with senior management, ensuring good flow of information, and ongoing communications on any national matters. Long Term ii) Representation made through Employers Association Group, Colleges Scotland, Principals Forum, and GCRB, within national bargaining process. iii) Emphasis being made nationally on imperative of financial sustainability and affordability issues particularly given increase staffing costs and challenges of the Glasgow Regional context. iv) Business continuity planning used to ensure all stakeholders appropriately communicated with in any potential industrial action.	d		5 2	As per Risk Appetite (Open)	O2a	Short	15	Increasing
O2b	Negative impact on employee relations at a local College level (e.g. local consultation)	1/	Theme 4 - Employer of Choice	Principal/ Assistant Principal HR	4	5	20	Short Term i) Focused work with Trade Unions, specific and regular meetings with senior management, ensuring good flow of information, and ongoing communications. ii) Regular direct communication with staff e.g. staff briefings, focus groups. iii) COVID 19 related communication sent regularly to all staff from the Principal and union involvement in risk assessment discussions Long Term iv) Discussion with unions on impact on College financial sustainability and organisational impacts. v) Business continuity planning used to ensure all stakeholders appropriately communicated with in any potential industrial action. vi) Ensure transparency of College consultation process to maximise opportunities for enhanced communications with Trade Unions		3	4 1	12 Lower than Risk Appetite (Cautious)	O2b	Short	12	No change
О3	Failure to achieve acceptably high standard quality of teaching delivery and support for students and suitable student experience	I/ Financial/	Theme 1 & 3 - Inspirational Learning & Teaching & Unrivalled Student Experience	Deputy Principal	5	5	25	Short Term i) Regular monitoring of teaching KPIs across relevant curriculum measures and actions implemented to develop improvement strategies: ii) Quality Assurance processes undertaken through annual cycle of activities including self evaluation, verification, feedback and audit. iii) Heads of Curriculum and Unit Managers monitor quality and delivery of service and implement actions for improvement. Extensive training on Teaching, Assessment and E learning ensure staff are updated and enabled to deliver a high quality learning experience. iv) Faculty staff work with students association, class reps and student feedback mechanisms to monitor feedback on quality and follow up on any issues v) Monitor feedback from student focus groups on student experience Long Term vi) Significant deployment of digital resources to learners and staff in areas of need to enhance delivery of blended learning approaches as well as the enhanced use of the VLE vii) A range of student feedback mechanisms are used to gather and inform improvement activities to improve the wider student experience. Development of classroom observation protocol as intimated in national bargaining. viii) Collaboration between teaching and support teams to ensure improvements and efficiencies are delivered where possible across College business processes and to deliver quality of services. ix) The DELTA E-Learning project and Research & Development Programme support a significant number of staff through capacity building, training and mentoring focused on delivering effective learning & teaching.		33	4	12 Lower than Risk Appetite (Cautious)	03	Medium	12	No change

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Risk Ref	Risk Description	Risk Category	Link to Strategic Plan Themes	Risk Owner	Proba bility	Impact	Risk Score	Mitigating Actions	Probabi ty	li Impact	Risk Score	Score compared to College risk appetite (see key above)	Risk Ranking after mitigating actions	Risk Timing Short / Medium/ Long Term	Score at last	Risk Increasing/ Decreasing/ No Change
O4	Failure in any area of College data management processes	Organisational/ I/ Reputational/ COVID impacts	Theme 5 - Financial Resilience through Operational Excellence	Vice Principal Resources & College Development & Deputy Principal	4	5	5 20	Short Term i) Ongoing monitoring by ICT of any potential systems being targetted ii) Multi Factor Authentication being rolled out across College staff Long Term iii) Key business systems and processes contain range of controls with agreed practices and staff training and communication on practices/guidelines. Role based user access restrictions in place. ii) Procedures and guidance in place including guide for staff on information and data security with a list of key do's and don'ts v) Data protection officer works closely with managers on any data protection matters. Clear procedures and guidelines in place including process for any potential data breaches. vi) Data privacy notices for the College in place and published and data sharing agreements with other organisations are established. vii) Document retention scheme in place for all key record types viii) Member of HE/FE Shared Technology and Information Services (HEFESTIS) which provides information on data management and any sectoral updates. ix) Homeworking guidance in place for staff x) External agencies assurance & audit processes review areas of data management and any recommendations followed up.		3 4	12	Lower than Risk Appetite (Cautious)	04	Medium	12	No change
O5	High Impact Disaster for College e.g. fire, long term power loss	Organisatio nal/ COVID impacts	Theme 5 - Financial Resilience through Operational Excellence	Vice Principal Resources & College Development	- 3	5		Long Term i) Health and safety risk assessments in place and required testing and audits completed on an annual cycle ii) Business Continuity Plan for College in place. iii) Estates condition survey completed and prioritising projects through estates based on affordability. iv) Business interruption insurance in place.		3 4	12	Lower than Risk Appetite (Cautious)	O5	Medium	12	No change
O6	Failure to achieve a sustainable fit for purpose College estate	Organisationa I/ Financial	Theme 1 & 5 - Inspirational Learning & Teaching& Financial Resilience through Operational Excellence	Vice Principal Resources & College Development	- 4	4	16	Short Term i) Need to plan within College tight resources due to financially challenging budget and items rephased as required. ii) Monitor use of College estate as result of COVID impacts and updated cleaning regime in place. iii) Plans for projects for use of the estates high priority maintenance funding Long Term iv) Capital masterplan in place and related to need/estates condition survey. Funding for very high priority items allocated by GCRB to College. v) Work with GCRB and SFC to ensure fully informed of estates requirements. vi) Estates Strategy Review completed		3	3	D Lower than Risk Appetite (Minimalist)	O6	Long	9	No change
07	Failure to recruit and retain an appropriately skilled and effective workforce	Organisationa I/ Reputational	Theme 1 & 4 - Inspirational Learning & Teaching & Employer of Choice	Assistant Principal HR	3	5	5 15	Short Term i) Maintain open channels of communication with trade unions, college managers and their staff, and effective attendance management process in place. ii) Cover arranged as required for absence of key staff members. iii) Need to manage to retain appropriate staff through challenge of restructures Long Term iv) College Strategic Theme of Employer of choice with attractive overall terms and conditions e.g. pension schemes, flexible working. v) All new staff have an induction process and annual training programme undertaken. vi) Appropriate CPD provided for staff to meet identified skills gaps vii) Managers work with their staff to consider any enhancements to skillsets and access to training e.g. webinars. General risk across staff in new levels of home working. viii) Recruitment and retention of staff for a few skills areas remains challenging and College continues to use a range of approaches as appropriate.		2 4		B Lower than Risk Appetite (Minimalist)	07	Medium	8	No change

GLA	SGOW CLYDE CO	LLEGE - STI	RATEGIC RISK	REGISTER	1			Key of abbreviations: SFC = Scottish Funding Council, GCRB = Glasgow Colleges Regional Board, GCG = Glasgow Colleges Group, SDS = Skills Development Scotland, ESF European Social Fund, JISC = Joint Information Steering Committee, FWDF = Flexible Workforce Development Fund, VLE = Virtual Learning Environment, DELTA project = Delivering Excellence in Learning, Teaching and Assessment, VPN = Virtual Private Network	=			tisk Appetite Residual Score 9 =Minimalist, 10-14 = Cau 20-25 = Hungry			as at 16t	h February 2022
Risk Ref	Risk Description	Risk Category	Link to Strategic Plan Themes	Risk Owner	Proba bility	Actions Impact		Mitigating Actions	Probabil ty		Risk Score	Score compared to College risk appetite (see key above)	Risk Ranking after mitigating actions	Risk Timing Short / Medium/ Long Term	Score at last	Risk Increasing/ Decreasing/ No Change
												,		3	the Board	
Gove	ernance Risks															
G1	Failure to comply with Health and Safety and Safeguarding requirements	Organisationa I/ COVID Impacts	Theme 1 & 5 - Inspirational Learning & Teaching& Financial Resilience through Operational Excellence	Assistant Principal HR	4		6 20	Short Term i) COVID related operating arrangements discussed at SLT. ii) Full review of Health and Safety Policy and Procedures being undertaken Long Term iii) Glasgow Clyde College Health and Safety and Safeguarding Committee and Campus Forums meet regularly to monitor health and safety arrangements and any issues are raised. iv) Safeguarding officers and safeguarding forum on each campus v) Health and Safety Officers working across the three campuses and ensure annual cycle of health and safety audits are completed vi) Regular reporting on Health and Safety to Organisational Development Committee as part of their remit requirements	2	2 .	5 10	Lower than Risk Appetite (Cautious)	G1	Short	10	No change
G2	Failure to meet all legislative and regulatory requirements and/or recommended guidance	Governance/ Reputational/ COVID Impacts	Theme 2, 4 & 5 - Partner of choice, Employer of Choice, & Financial Resilience through Operational Excellence	Principal/ Clerk to the Board	4		6 20	Short Term i) Close involvement in ongoing discussions on COVID 19 implications with SFC and representative forums to contribute towards sector input to seek support for current and future resultant challenges ii) Ongoing engagement at Board and Senior Leadership Team level with the SFC Review Long Term iii) Work within roles, responsibilities and legal implications of Legislation and associated related guidance. iv) Liaison with and maintaining ongoing dialogue with relevant bodies e.g. SFC, GCRB and Scottish Government. College ensure full knowledge and implementation of legislative, regulatory and guidance requirements including requirements of Financial Memorandum with GCRB. v) Individual managers required to keep up to date with legislation relating to their areas and implement appropriate controls vi) Ensure Board have appropriate training on key guidance and legislation and take proactive role in ensuring meet all requirements. vii) Modern Slavery statement in place viii) Quality audit process in place and DELTA project delivering greater levels of blended learning with staff. Internal audit review process considers range of areas annually. ix) Seek legal advice as required. x) Data Protection Officer in place to advise on General Data Protection Regulation/ Data Protection matters.		3	3 5	D Lower than Risk Appetite (Minimalist)	G2	Medium	9	No change
G3	Failure to recruit, train and retain an appropriately experienced Board of Management	Governance	Theme 1, 2, 3, 4 & 5 - inspirational Learning & Teaching, Partner of Choice, Unrivalled Student Experience, Employer of Choice, & Financial Resilience through Operational Excellence	Clerk to the Board	3	4	12	Long Term i) Continue to maintain membership of Board of Management at suitable level with the correct level and mix of skills. Succession planning taking place with the Nominations Committee considering future vacancies well in advance. ii) Recruitment of new Board members to consider diversity of membership (e.g. gender and ethnic background) iii) Annual self assessment for Board members and training provided as required. iv) Board effectiveness review completed. v) Induction provided for all new Board members. vi) Ensure Board undertake an ongoing programme of training to meet CPD needs. vii) Board member handbook in place and an annual review/update to be undertaken. viii) New Clerk to the Board has commenced in post.		2 3	3	Cover than Risk Appetite (Averse)	G3	Medium	6	No change

Glasgow Clyde College Audit Committee Schedule of Work 2021/22

Four meetings in each annual academic session

For Discussion / Decision Audit Committee Schedule of Work Internal Audit Reports as per Plan Internal Audit 2020/21 Plan Progress and Plan for 2021/22 College Assurance Framework Update College Strategic Risk Register Data Protection Update For Information/ Noting Internal & External Audit Rolling Action Plan Audit Scotland Report: Scotland's Colleges 2021 (as available) Updates from SFC (if available) 24th November 2021 For Discussion / Decision Audit Committee Schedule of Work Report on Going Concern Draft Annual Financial Statements for year ending 31 July 2021 External Audit Annual Report for year ending 31 July 2021 Final Internal Audit Annual Report 2020/21 Internal Audit Plan for 2021/22 and beyond Draft Annual Report from Audit Committee to Board of Management Student Activity Data Audit Annual Report 2020/21 Student Support Funds Audit Annual Report 2020/21 Cyber Security Update For Information/ Noting Internal and External Audit Rolling Action Plan Strathclyde Pension Fund Actuarial Valuation Report — Accounting Assumptions National Fraud Initiative 2020/21 Exercise College Strategic Risk Register Private meeting with internal and external auditors Updates from SFC (if available) 2nd March 2022 For Discussion/ Decision Audit Committee Schedule of Work Internal Audit Reports as per Plan	29 September 2021
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Data Protection Update
For Information/Noting
Internal & External Audit Rolling Action Plan
SFC Update (if available)
25 th May 2022
For Discussion/Decision
Audit Committee Schedule of Work
Internal Audit Reports – as per Plan
Internal Audit Plan 2021/22 Plan Progress and Plan for 2022/23
External Audit Planning Memorandum for 2021/22
Certificate of Assurance
College Strategic Risk Register
College Assurance Framework
Cyber Security Update
Fraud Response Plan
Approval of Accounting Policies
Internal & External Audit Rolling Action Plan