

#### Status: Approved

#### AUDIT COMMITTEE MEETING

#### MINUTE OF MEETING HELD ON 19 MARCH 2024 AT 16:00 VIA TEAMS

Present:			
Gillian Brydson (Chair)	William Dowson (V	VD) from item 3	Jamie Ross (JR)
Ann Hill (AH)	Sue Irving (SI)		Malcolm MacLeod (MM)
In attendance:			
Caroline Stuart (CS)	Joanna Campbell (	(JC) late	Joe McGraw (JM)
Douglas Dickson (DD)	Karen Hunter (KH)		Michael Gibson – RSM (MG)
Lorraine Grierson (LG)	Alexandra Elkins (r	note taker)	

#### 1. Welcome and Apologies for Absence | Verbal | G. Brydson

1.1. The Chair welcomed everyone to the meeting and the meeting was recorded as quorate.

#### 1.2. Declaration of Interests or Connections | Verbal | G. Brydson

1.3. There were no declarations of interest noted.

#### FOR APPROVAL

#### 2. <u>Minutes of Previous Meetings and Matters Arising</u>

#### 2.1. Minute of the Last Meeting 29 November 2023 | Paper 2.2 | Approval | G. Brydson

2.1.1. The minute of the last meeting was approved as an accurate record of the meeting.

#### 2.2. Action Log | Paper 2.2 | Approval | L. Grierson

2.2.1. The Committee noted one open item relating to the Risk Register (item 1) which would be tabled at the next Board Strategy event. Item 3, Executive capacity will be reviewed in a paper at the next Remuneration Committee meeting and the item relating to the use of personal emails will be discussed at the next Board of Management Committee meeting. All other items were closed.

#### 2.2.2. The Committee approved the Action Log.

#### 3. Strategic Risk Register | Paper 3.1 | Approval | L. Grierson

3.1. The Committee were asked to review Risk 4 - Financial Fraud and Risk 11 - Failure to Achieve and Maintain Systems and Operable and Secure ICT, which sit with the Audit

Committee. Following scrutiny of both risks, it was agreed to make no further changes. During the discussion, the Chair of the Board highlighted the continued cyber-attack risk in light of the recent NHS cyber-attack in Dumfries and Galloway.

3.2. The Committee noted that Risk 3 had been increased to 25 and the narrative updated. Risks 8, 9 and 10 were unchanged.

WD joined the meeting at 16:06 hrs.

- 3.3 The Chair noted the extensive discussion of risk 8 which had taken place at the recent Learning and Teaching Committee and subsequent recommendations.
- 3.4 The Depute Principal recommended a reduction to Risk 8 and 10 in light of supporting data, showing a sustained upward trend in performance and continued student satisfaction which is at 97%. The Committee noted the recommendation and supported the endorsement to reduce the rating of both at the next Learning and Teaching Committee meeting.

#### 3.5 **The Committee approved the risk register.**

JC joined the meeting 16:14 hrs

#### FOR DISCUSSION

- 4 Internal Audit Progress Report | Paper 4.1 | Discussion | M. Gibson/RSMUK
- 4.1 An update towards completion of the annual audit plan was provided showing that of the 9 audits contained, 2 are in progress and 2 in the planning. No major concerns were reported and the Committee noted good progress, clear reportage and timelines.
- 4.1.2 Following a query regarding changes to the timelines for audits, it was confirmed that the amendment to the schedule of the Business Continuity item had been discussed and agreed at the last meeting and any further changes to the plan would be agreed with Audit committee.

#### 4.2 Financial Planning – Budget Monitoring Audit Report || Paper 4.2 | Discussion | M. Gibson

- 4.2.1 The audit had been undertaken to determine if robust systems and processes were in place with regard to financial planning and budget monitoring. Substantial assurance had been provided resulting in 4 low-priority management actions recommended. The Committee commended the positive outcome of the audit report.
- 4.2.2 JC acknowledged the improvements in practices and work undertaken by the finance team and welcomed the endorsement through the audit process.

#### 4.2.3 The Committee noted the Financial Planning – Budget Monitoring Audit Report.

4.3 <u>GDPR Audit Report || Paper 4.3 | Discussion | M. Gibson</u>

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- 4.3.1 An advisory review was provided to ensure that adequate and effective processes were in place to ensure GDPR compliance. The review concluded that processes were in place and recommended 1 medium and 5 low management actions, highlighting that data retention periods required closer inspection.
- 4.3.2 A query was raised on the outcomes in comparison with similarly sized organisations and the college's position was considered favourable in comparison.
- 4.3.3 The Committee enquired about methods to encourage staff ownership and engagement with record keeping and a variety of arrangements and communications with managers and the Data Protection Officer were explained.

#### 4.3.4 The Committee noted the GDPR Audit Report.

- 4.4 Risk Management Audit Report || Paper 4.4 | Discussion | M. Gibson
- 4.4.1 The audit had been undertaken to determine if appropriate systems and processes were in place to identify and track risks and mitigations and Reasonable assurance had been awarded. The review concluded that processes were in place and identified the need for improvements in documentation with 5 medium and 4 low priority management actions recommended.
- 4.4.2 Comments and questions were invited from attendees and the risk management at operational departmental level was discussed. The Executive outlined existing processes facilitating the discussion of risk at an operational level and within the Senior Leadership Team as a standing item at meetings. It was suggested that enhanced documentation to capture emerging risks and improved measures to capture discussion at SLT be explored. The Principal advised that other colleges have a whole team working on risk, however after discussion with ELT, additional scrutiny to the risk process can be captured without requiring additional resources. The definition of 'inherent risk', and 'residual risk' was explained.
- 4.4.3 No delays to the completion of the audit actions were anticipated.

#### 4.4.4 The Committee noted the Risk Management Audit Report.

#### 4.5 Internal Audit Tracker | Paper 4.5 | Discussion | L. Grierson

- 4.5.1 A summary of progress towards the actions within the 5 open reports was provided noting that all previous management actions had been completed. Following publication of the 3 new audit reports a further 15 actions were had been added.
- 4.5.2 The Committee welcomed the layout of the report.
- 4.5.3 **The Committee noted the Internal Audit Tracker.**
- 5 Business Continuity Management Plan | Paper 5.1 | Discussion | J. McGraw

#### OFFICIAL

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- 5.1 JM advised that following work with Zurich, the College's risk management consultant, the Contingency and Disaster Management Procedure was updated and a new Business Continuity Plan was developed. The plan provides clear guidance on what the College will do in the event of an incident which could give rise to business disruption. Training for line managers had been provided and the framework was designed to ensure guidance and flexibility, items had been categorised in levels with appropriate methods of testing developed. Board members were invited to participate in 'desktop' testing exercises.
- 5.2 The Level 3 category was queried regarding the managing of communications in the event of a serious incident. It was recommended to include a communication plan with major stakeholders as well as management of communications with the Board and Chair of the Board of Management, which was supported by the Committee.
- 5.3 JR recommended the inclusion of an item/exercise around extreme financial pressure. It was agreed that an item on financial continuity be added to the plan.
- 5.4 CS welcomed the introduction of the framework and recommended the development of an analogue Business Continuity Plan in the event of no communication lines. The Executive provided assurance, listing a variety of practices employed by College management and staff to support business continuity, all of which were tested in Dec 2023.
- 5.5 One Member queried the transition from level 2 actions to level 3 and the potential for gaps as there is no clear cut-off between them ie level 2 mentions an incident affecting 10% of staff and students whilst level 3 states closure of a location for at least 5 days. The design and modelling of the plan were further explained, however the Committee recommended increased clarity around the escalation of timeframes for some actions and testing in real-time conditions. It was also recommended that the role of the Board should be included.
- 5.6 The Committee welcomed the framework.
- 5.7 It was confirmed that linkage with regional planning groups and partners was in place and it was deemed appropriate to explore collaboration with partners for desktop exercises.

#### 5.8 **The Committee noted the Business Continuity Management Plan.**

#### FOR INFORMATION ONLY

M.Gibson left the meeting 16:59 hrs.

- 6 Internal Audit Tender Update | Paper 6.1 | Approval | K. Hunter
- 6.1 Confidential
- 6.2 Action: KH to communicate.

#### 7 AOCB

7.1 None was raised.

# 8 Date of the Next Meeting

8.1 The date of the next meeting is scheduled for Tuesday 04 June 2024 at 1600hrs.



One step ahead

# AUDIT COMMITTEE ACTION LOG 19.03.24



No	Meeting Date	Action	Lead	Deadline	Status	Commentary
1	13/6/23	To ensure the Risk Register reflected the strategic needs of the College, the item is to be included as part of a future strategy event.	LG	May 24	Ongoing	Bd Secretary to liaise with Chair of the Board to include in Strategy meeting in May 24.
2	13/6/23	Business Continuity Plan and overarching plan will be brought back to the Committee in due course.	BC	<del>Sep 23</del> <del>Nov 23</del> Mar 24	Closed	Zurich are assisting with the contingency plans at present, therefore the BC Plan will be brought to Audit Committee on 29 <sup>th</sup> November, once they are complete. NOV UPDATE: Business Continuity Plans are being progressed currently and will be brought to the meeting in March 2024. MAR 24 UPDATE: BCP presented at Mar 24 meeting.

No	Meeting Date	Action	Lead	Deadline	Status	Commentary
3	19/9/23	Board Secretary to include the item on Executive Capacity risk for discussion at the next Board Development Committee.	LG	Dec 23	Closed	As requested, action has been moved to RemCom meeting for Jan 24.
		<ul> <li>Action from 29/11/23 – move to Rem Com</li> <li>Board Secretary to table the use of personal</li> </ul>			Closed	Moved to BDC Action Log Feb 24
		email addresses at the next BDC				
4	29/11/23	Amend narrative for Risk 3 to reflect external funding agencies as the key risk.	LG	Mar 24	Closed	Risk updated as presented at Mar 24 meeting.
5	29/11/23	Audit Committee Annual ReportAdjust narrative to provide additional context in regard to increases in actions and at point 5 Risk.	КН	Dec 23	Closed	Report updated and sent out to members Nov 23. Tabled at BoM 11Dec23 and approved.
6		Item 7.1 - Annual External Audit ReportPage 6 - additional context around 'funding pressures' be added to the first line. Add "in 2023/24 and beyond" in the final paragraph of page 6.	КН	Dec 23	Closed	Narrative amended and accounts signed in Dec 23
		Item 7.4 - Letter of Representation, Draft Financial Statements				
		Narrative be included to reference the 'external financial environment' ACTION: - KH will strengthen the statement within the accounts.				



#### DUMFRIES AND GALLOWAY COLLEGE

MEETING	
AGENDA ITEM:	3
PAPER NO:	AUD0324-3.1

Date	19 March 2024
Location	MS Teams On-line
Title of Paper	Strategic Risk Register
Presented By	Lorraine Grierson
Recommendation	Approval
Appendix Attached	NO
Disclosable Under FOISA	YES

Read Time: 10 minutes

#### 1. Recommendation

1.1 The Audit Committee are asked to consider, and if so minded, approve the Strategic Risks 4 and 11 and consider any changes to Risks presented by the Committees.

#### 2. Executive Summary

2.1 The purpose of this paper is to provide the Committee with the opportunity to review the College's Strategic Risks assigned to Audit Committee, note changes to risks assigned to other Committees and oversee the full register.

#### 3. Context

- 3.1 The Principal and Executive Leadership Team routinely review the Strategic Risk Register to reflect the key risks to the College and the mitigations that are applied to each risk.
- 3.2 Currently Audit Committee has 2 risks assigned to it for review and any amendment made to these is noted below:
  - Risk 4 Financial Fraud no changes
  - Risk 11 Failure to achieve and maintain systems and operable and secure ICT no changes
- 3.3 Currently there are 6 risks showing an inherent major risk (red), however after mitigations have been applied, these are reduced to 'significant' risks.
- 3.4 Risk 3: Failure to achieve institutional sustainability the inherent risk has been increased to a **fundamental 25 rating** (purple). After mitigations, the residual rating of 20 still remains a **major risk**. This is in line with the current and continued external financial position which is of concern and needs to be monitored closely.

#### 3.5 **Finance and General Purposes Committee**

- Risk 3 Financial Sustainability The following amendments have been made in line with FGP/Audit Committee recommendations to enhance external funding is the main cause for concern.
  - Descriptor: Failure to achieve institutional sustainability due to sector-level budget allocations in 2024-25
  - Consequences: The college will be unable to operate within the Scottish Public Finance Manual, contravening governance requirements by SG, Section 22, Reputational damage to Board and F&GP.
- Risk 7: Industrial Relations amendment to front line mitigation and monitoring. It has been noted that there is potential for the risk to increase should a local dispute be raised by EIS/FELA if salary deductions are made for participation in ASOS.

#### 3.5 Learning and Teaching Committee

- ➢ Risk 8 Failure to achieve highest academic performance levels no change.
- ▶ Risk 9 Failure to adhere to academic compliance arrangements **no change**.
- > Risk 10 Failure to achieve an effective student experience **no change**

#### 3.6 Board of Management

➤ Risk 12: H&S Compliance – an amendment to frontline monitoring has been added.

#### 4. Strategic Implications

4.1 The risks associated with Audit Committee link into the following strategic priorities:
 Priority 1 – Student Experience, Priority 4 – Growth and Financial Sustainability; Priority 5 – Systems and Infrastructure

#### 5. Risk

Risk	Mitigations
Risks 4, 11	Paperwork attached for reference.

#### 6. Implications

Financial	Yes	Financial loss and reputational damage and impact to financial sustainability.
Legal	Yes	Compliance with UK GDPR and the Data Protection Act 2018 (DPA 2018) and the Privacy and Electronic Communications Regulation 2003 (PECR 2003).ICO implications.
Learning and Teaching	Yes	Serious impact to the college's ability to operate and deliver education to students, financial loss, loss of data and reputation.
Equalities	No	

#### L Grierson

Secretary to the Board 26/2/24

#### STRATEGIC RISK REGISTER

	RISK DEFINITION	ORIGINAL TASK				RESIDUA	AL RISK				
No	Risk	Likelihood	Impact	Total	Risk Level	Likelihood	Impact	Total	Risk Level	Risk Appetite	Trend
Resp	esponsible Person – Principal										
1	Failure of College strategy to	meet the nee	ds of Dumfri	es and Gallo	oway Region a	and/or national	l priorities	(BoM)			
		4	4	16		3	3	9		Open	=
2	Legal actions; serious accider	nt; incident or o	civil/criminal	breach (Bo	M)						
		5	3	15		3	2	6		Cautious	=
Resp	onsible Person – Executive I	Director of Fi	nance and P	lanning							
3	Failure to achieve institutional	sustainability	(FGP)								
		5	5	25		4	5	20		Cautious	=
4	Financial Fraud (AUD)										
		4	3	12		3	2	6		Averse	=
6	Failure to meet regulatory obli	igations (BoM	)								
		3	5	15		5	1	5		Avoid	=
Resp	oonsible Person – Vice Princi										
5	Business Continuity Incident -	- Fire, System	s, Emergenc	y Procedure	es, Health (Bo	oM)					
		4	4	16		4	3	12		Avoid	=
7	Failure to achieve effective Ind	dustrial Relation	ons (FGP)								
		5	4	20		5	3	15		Cautious	=
11	Failure to achieve and mainta	in systems an	d operable a	nd secure I	CT (AUD)						
		4	5	20		3	4	12		Avoid	=
12	Health and Safety (BOM)										
		4	5	20		3	4	12		Avoid	=
Resp	onsible Person - Depute Pri	ncipal Learni	ng, Skills an	d Student	Experience						
8	Failure to achieve highest aca	idemic perform	nance levels	(LT)							
		4	4	16		3	4	12		Cautious	=
9	Failure to adhere to academic	compliance a	rrangements	s (LT)							
		4	3	12		2	2	4		Avoid	=
10	Failure to achieve an effective	e student expe	rience (LT)								
		3	4	12		2	4	8		Cautious	=

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#### KEY: ASSESSMENT OF RISKS

Risks which should be monitored by the Risk Management Group:	Scores: 1 – 8	Minor Risk
Risks to be brought to the attention of SMTand Board of Management:	Scores: 9 - 15	Significant Risk
Risks to be reported to, and monitored by, Board of Management:	Scores: 16 – 20	Major Risk
Risks to be reported to, and monitored by, Board of Management:	Scores: 21 – 25	Fundamental Risk

#### **Risk Score Matrix**

Impact 5 <mark>20</mark> 15 3 2 <mark>10</mark> 5 Likelihood

Strategic Objective:

Risk No: 1 Failure to meet Region/National Priorities

Reference to	Strategic
Departmental Risk	
Registers:	
Owner:	Principal
Description of the	Failure of College strategy to meet the needs of Dumfries and Galloway Region and/or
Risk:	national priorities
What are the possible	Loss of credibility, unable to meet economic and societal needs of region, curriculum not
consequences if the	fit for purpose, College will not meet funding targets and will not remain financially
risk was to emerge?	sustainable

Numerical Scoring of Gross Risk (i.e., without controls in place)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
<b>LIKELIHOOD</b> of the risk occurring?	4/5	of the risk?	4/5	score? (A x B)	16/25
The <b>GROSS</b> risk is therefore: (MIN/SIG/MAJ/FUN)	Major Risk				

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	• Workplans and oversight in line with ROA and Financial targets	<ul> <li>Clear performance metrics for all strategic outcomes and linked to individual performance targets reviewed on regular basis</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>Robust strategic planning</li> <li>Effective environmental scanning</li> <li>Strong and effective partnerships</li> <li>Clear links between strategy and practice</li> <li>Concerted demands for increased activity levels</li> </ul>	<ul> <li>Membership of key strategic groups</li> <li>SLT Systems of Control and Reporting</li> <li>Amendment of strategic direction/plans to government policy and regional economic strategy</li> <li>Robust monitoring of activity targets via ROA and reported quarterly to SFC</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies		<ul> <li>Ongoing engagement and reporting to SFC</li> <li>Ongoing engagement and reporting to SDS</li> <li>External Audit</li> <li>BoM oversight</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont.)						
What is the     (A)     What is the     (B)     What is the       predicted     predicted IMPACT     total risk						
LIKELIHOOD of the risk occurring?	3/5	of the risk?	3/5	score? (A x B)	9/25	

Risk Status	Meeting 1 SIG	Meeting 2	Meeting 3 SIG	Meeting 4
	310	516	310	

MEETING	AMENDMENTS TO RECORD
Q1	Net risk to remain as financial sustainability still an ongoing issue - Owner
Q2	Net risk to remain as financial sustainability still an ongoing issue - Owner
Q3	Net risk to remain as financial sustainability still an ongoing issue - Owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Open	Hungry
1	Failure of College strategy to meet the needs of Dumfries and Galloway Region and/or national priorities						
4	Financial Fraud						
6	Failure to meet regulatory obligations						

# Strategic Objective:

# Risk No: 2 Legal Actions, Serious Incidents

Reference to Departmental Risk Registers:	Strategic
Owner:	Principal
Description of the Risk:	Legal actions; serious accident; incident or civil/criminal breach
What are the possible consequences if the risk was to emerge?	Financial loss to the college, impact on reputation and potential criminal / civil legal proceedings

Numerical Scoring of Gross Risk (i.e., without controls in place)							
What is the predicted LIKELIHOOD of the	(A)	What is the predicted <b>IMPACT</b> of the risk?	(B)	What is the total risk			
risk occurring?	5/5		3/5	score? (A x B)	15/25		
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUND	Significant	Risk					

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Mandatory staff training on regulatory compliance areas</li> <li>Continuous professional development</li> </ul>	<ul> <li>Records of staff training and completion</li> <li>Line Manager oversight</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial	<ul> <li>Adherence to legislative and good practice requirements</li> <li>Positive Union relations and staff communication</li> <li>Ongoing management development programmes</li> <li>Whistleblowing Policy</li> </ul>	<ul> <li>Monitoring and reporting in key areas – e.g., H&amp;S, equalities, employee engagement, post-Covid arrangements</li> <li>Internal audit actions</li> <li>Staff surveys</li> </ul>

controls / Management controls / Project assurance		
INDEPENDENT ASSURANCE Internal Audit / external	External legal advice contract in place and used where appropriate	<ul> <li>Internal and External Audit</li> <li>BoM oversight</li> </ul>
bodies		

Numerical Scoring of NET Risk (i.e., with controls in place)							
What is the predicted LIKELIHOOD of the risk occurring?	(A) 3/5	What is the predicted <b>IMPACT</b> of the risk?	(B) 2/5	What is the total risk score? (A x B)	6/25		

Risk Status	Risk Status Meeting 1		Meeting 3	Meeting 4
	MIN	MIN	MIN	

MEETING	AMENDMENTS TO RECORD
Q1	Risk to remain as per previous score after treatment - Owner
Q2	Net risk to remain as per previous score - Owner
Q3	Net risk after treatment to remain as per previous score - Owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Open	Hungry
2	Legal actions; serious accident; incident or civil/criminal breach						

# Strategic Objective:

# Risk No: 3 Financial Sustainability

Reference to	Financial
Departmental Risk	
Registers:	
Owner:	Executive Director of Finance and Planning
Description of the	Failure to achieve institutional sustainability due to sector-level budget
Risk:	allocations in 2024-25
What are the possible	The college will be unable to operate within the Scottish Public Finance
consequences if the	Manual, contravening governance requirements by SG, Section 22,
risk was to emerge?	Reputational damage to Board and F&GP

Numerical Scoring of Gross Risk (i.e., without controls in place)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
LIKELIHOOD of the risk occurring?	5/5	of the risk?	5/5	score? (A x B)	25/25
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUND	Fundamenta	al Risk			

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Increase commercial income to reduce reliance on SFC funding</li> <li>Effective cost control</li> <li>Active tracking of Credits achieved/forecast vs target</li> <li>Protection of funding through dialogue with SFC</li> </ul>	<ul> <li>Regular review of Financial strategy and non-core income sensitivity</li> <li>Finance business partnering to review budgets /spend with Managers, and timely preparation of Management Accounts and forecasts</li> <li>Continuous monitoring of demand v funding allocation of student funds</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>Strategic plan and Operating Plans approved by BoM and Committee</li> <li>Budgets approved by BoM and Committee</li> <li>Major project business cases approved by BoM and Committee</li> <li>Finance Directors Network</li> </ul>	<ul> <li>Regular internal reporting to SLT, BoM and Committee</li> <li>Regular interaction with Scottish Funding Council Finance Team</li> <li>Knowledge exchange through Finance Directors Network / Colleges Scotland</li> <li>VPs Group and Principals Group</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies	<ul> <li>Internal Audit Programme agreed by BoM/Audit Committee</li> <li>External Auditors appointed through Audit Scotland</li> <li>Regional Outcome Agreement</li> </ul>	<ul> <li>BoM/Committee review and approval of IA reports and action points tracking</li> <li>Audit Committee/BoM oversight</li> <li>Regular returns to Scottish Funding Council (FFR/FES)</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont.)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
LIKELIHOOD of the risk occurring?	4/5	of the risk?	5/5	score? (A x B)	20/25
lisk occurring?				(A x b)	

Risk Status	Meeting 1	Meeting 2	Meeting 3	Meeting 4
	MAJ	MAJ	MAJ	

MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	Timely preparation of Management Accounts and forecasts added to Front Line Monitoring. SLT added to Oversight of Management Activity Monitoring – Owner
	FGP have considered the net rating given the mitigations in place but agree that the funding element of the risk is still significant, therefore the rating will remain the same. Members asked for consideration to be given to the wording in the risk to reflect funding as the major concern.
	Audit - the funding element being the significant risk, the Committee agreed that the narrative should be revised to ensure clarity that the risk was attributed to external funding restrictions Owner to re-word
Q3	Suggest scoring of Gross Risk increased to Fundamental. Description of Risk updated to refer to sector level budget allocations and ability to operate within SPFM
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Open	Hungry
3	Failure to achieve institutional sustainability						

# Strategic Objective:

### **Risk No: 4 Financial Fraud**

Reference to Departmental Risk Registers:	Financial
Owner:	Executive Director of Finance
Description of the	Financial Fraud
Risk:	
What are the possible consequences if the risk was to emerge?	Financial Loss, Loss of reputation, impact to financial sustainability

Numerical Scoring of	Numerical Scoring of Gross Risk (i.e., without controls in place)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk		
LIKELIHOOD of the risk occurring?	4/5	of the risk?	3/5	score? (A x B)	12/25	
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUN	Significant	Risk				

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>No PO / no Pay policy</li> <li>Scheme of financial delegation</li> <li>Segregation of duties and review of transactions</li> <li>Staff training and sharing of good practice for emerging fraud risks</li> </ul>	<ul> <li>Continuous review of financial controls</li> <li>Implementation of Internal Audit recommendations</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>Review of impact of any changes in structure or duties</li> <li>Public Interest Disclosure (Whistleblowing) Policy</li> <li>Review of lessons learned report from COGC</li> </ul>	<ul> <li>Continuous review of financial controls</li> <li>Budget / spend review</li> <li>Monitoring across SLT Directorates</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies	<ul> <li>Internal Audit plan</li> </ul>	<ul> <li>Internal Audit</li> <li>External Audit</li> <li>Counter Fraud Initiative</li> <li>Audit Committee/BoM oversight</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont.)

What is the	(A)	What is the	(B)	What is the	
predicted LIKELIHOOD of the	3/5	predicted <b>IMPACT</b> of the risk?	2/5	total risk score?	6/25
risk occurring?	5/5	Of the fisk?	2/5	(A x B)	0/23

Risk Status		Meeting 1 MIN			Meeting 4
MEETING		NDMENTS TO RECO	ORD		
Q1	Staff t	training and sharing g	good practice added t	o Front Line Mitigatio	ns
Q2	No ch	ange - Owner			
Q3	No ch	ange - Owner			

Q3 No

I	No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Ope n	Hungry
	4	Financial Fraud						

#### Strategic Objective: Risk No: 5 Business Continuity

#### Reference to Organisational **Departmental Risk Registers:** Owner: VP People and Transformation Description of the Business Continuity Incident - Fire, Systems, Emergency Procedures, Health Risk: threats Serious impact to the college's ability to operate and deliver education to What are the possible students, safeguarding of staff and students, impact to financial sustainability of consequences if the college, loss of reputation risk was to emerge?

Numerical Scoring o	Numerical Scoring of Gross Risk (i.e., without controls in place)						
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk			
LIKELIHOOD of the risk occurring?	4/5	of the risk?	4/5	score? (A x B)	16/25		
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUN	Major Risk						

3 LINES OF DEFENCE	MITIGATIONS	MONITORING		
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Documented disaster recovery procedures, regularly reviewed</li> <li>Separate COVID -19 – Risk Register /BCT Plan in place</li> <li>Sound systems of administration</li> <li>Staff CPD on business continuity themes</li> <li>Monitoring Public Health Advice</li> <li>Increased awareness of</li> </ul>	<ul> <li>Adherence to local and national Public Health Guidance</li> <li>SA Climate awareness activities</li> <li>Regular review/reporting on milestones, systems effectiveness etc.</li> <li>Business Continuity Plan including scenario testing</li> <li>Active data protection monitoring and auditing</li> </ul>		

	<ul> <li>climate emergency issues</li> <li>Planning, careful phasing of changes to processes, systems, and equipment</li> <li>Effective management of / Asset Register in place</li> <li>Effective management of systems and GDPR</li> <li>Rolling programme of routine</li> </ul>	<ul> <li>Liaison with SFC and</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	updates to systems and equipment	Colleges Scotland – COVID- 19 response groups • Climate Emergency College Group (includes Student Representatives)
INDEPENDENT ASSURANCE Internal Audit / external bodies	Communication to stakeholders	<ul> <li>Internal Audit on process and statutory compliance</li> <li>BoM oversight</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont.)							
What is the predicted LIKELIHOOD of the	(A) 4/5	What is the predicted <b>IMPACT</b> of the risk?	(B)	What is the total risk score?	12/25		
risk occurring?	4/5	of the fisk?	3/5	(A x B)	12/20		

Risk Status	Meeting 1	Meeting 2	Meeting 3	Meeting 4
	ຣເດັ	SIG	SIC	U
	316	316	316	

MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	No Change by Owner
Q3	No change by owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Open	Hungr y
5	Business Continuity Incident, e.g., Fire, MIS Failure, Failure of Emergency Procedures, Threats to Health						

Risk No: 6 Failure to meet Regulatory Obligations
Organisational
Executive Director of Finance and Planning
Failure to meet regulatory obligations
Loss of reputation, impact to financial sustainability, Government bodies intervention

Numerical Scoring of Gross Risk (i.e., without controls in place)							
What is the	(A)	What is the	(B)	What is the			
predicted		predicted IMPACT		total risk			
LIKELIHOOD of the	3/5	of the risk?	5/5	score?	15/25		
risk occurring?				(A x B)			
The GROSS risk is							
therefore: Significant Risk							
MIN/SIG/MAJ/FUN	_						

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Prevent, Health and Safety and Safeguarding training</li> <li>Staff awareness and contingency planning</li> <li>Engagement/practice sharing with local agencies</li> </ul>	<ul> <li>Business Continuity Plan including scenario testing</li> <li>Information sharing with local agencies</li> <li>HR monitors staff numbers trained</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>Engagement/practice sharing with local agencies</li> <li>Board approval of SFC submissions</li> </ul>	<ul> <li>Information sharing with local agencies</li> <li>SFC obligations</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies		<ul> <li>Internal Audit across all areas</li> <li>Annual external Audit</li> <li>BoM oversight</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont.)							
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk			
LIKELIHOOD of the risk occurring?	5/5	of the risk?	1/5	score? (A x B)	5/25		

Risk Status	Meeting 1 MIN	Meeting 2 MIN	Meeting 3 MIN	Meeting 4
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MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	No change by Owner
Q3	No change by Owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Ope n	Hungry
6	Failure to meet regulatory obligations						

### Strategic Objective: Risk No: 7 Failure to Achieve Effective Industrial Relations

Reference to	Organisational	
Departmental Risk		
Registers:		
Owner:	Vice Principal People and Transformation.	
Description of the	Failure to achieve effective Industrial Relations through local	
Risk:	dialogue/relationships and effect of national campaigns from trade unions	
What are the possible		
consequences if the Financial loss, impact to ability to effectively teach, industrial action, action		
risk was to emerge?	short of strike action (ASOS), loss of reputation.	

Numerical Scoring o	Numerical Scoring of Gross Risk (i.e., without controls in place)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk		
<b>LIKELIHOOD</b> of the risk occurring?	5/5	of the risk?	4/5	score? (A x B)	20/25	
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUN	Major Risk					

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Constructive formal and informal communication channels</li> <li>Regular meetings</li> <li>Staff awareness and contingency planning</li> <li>Consideration of deductions from salary for participation in ASOS</li> </ul>	<ul> <li>LJNC</li> <li>College Employers Scotland advice and updates</li> <li>Regular union/management dialogue</li> <li>Communication issued to teaching staff about possibility of salary deductions for participation in ASOS. Ongoing dialogue with local TU Representatives. Risk could increase if local dispute raised</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>LJNC (Local Joint Negotiation Committee)</li> <li>Representation at Employers Association</li> <li>NRPA (National Recognition and Procedures Agreement)</li> <li>Engagement/practice sharing with local agencies</li> <li>Attendance at Strategic HR Network</li> </ul>	<ul> <li>ELT/SLT/Board</li> <li>Regular employee engagement monitoring</li> <li>Regular union/management dialogue</li> </ul>
INDEPENDENT ASSURANCE	College Employers Scotland	<ul><li>SFC/Scottish Government</li><li>FGP/BoM oversight</li></ul>

Internal Audit / external	
bodies	

Numerical Scoring of	Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont.)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk		
LIKELIHOOD of the risk occurring?	5/5	of the risk?	3/5	score? (A x B)	15/25	

Risk Status	Meeting 1 SIG	Meeting 2 SIG	Meeting 3 SIG	Meeting 4
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MEETING	AMENDMENTS TO RECORD				
Q1	<ul> <li>No changes by Owner.</li> <li>FGP asked for the description and consequences to be amended as below:</li> <li>Failure to achieve effective Industrial Relations through local dialogue/relationships and effect of national campaigns from trade unions.</li> <li>Consequences: Financial loss, impact to ability to effectively teach, industrial action, action short of strike action (ASOS), loss of reputation.</li> </ul>				
Q2	No change by Owner.				
Q3	Owner - Potential for risk to increase should a local dispute be raised by EIS/FELA if salary deductions made for participation in ASOS. Front Line mitigation added - Consideration of deductions from salary for participation in ASOS. Front Line Monitoring added - Communication issued to teaching staff about possibility of salary deductions for participation in ASOS. Ongoing dialogue with local TU Representatives. Risk could increase if local dispute raised				
Q4					

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Ope n	Hungry
7	Failure to achieve effective Industrial Relations						

# Strategic Objective: performance

# Risk No: 8 Failure to achieve highest academic

Reference to	Organisational
Departmental Risk	
Registers:	
Owner:	DP Learning Skills and Student Experience
Description of the	Failure to achieve highest academic performance levels
Risk:	
What are the possible consequences if the risk was to emerge?	Loss of reputation in the region, financial sustainability, ability to attract future students and educational partners
	Note – College performance has been a long term issue that predates COVID

Numerical Scoring of Gross Risk (i.e., without controls in place)

What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
LIKELIHOOD of the	4/5	of the risk?	4/5	score?	16/25
risk occurring?				(A x B)	
The GROSS risk is					
therefore:	Major Risk				
MIN/SIG/MAJ/FUN					

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Online reports with curriculum areas performance</li> <li>Action planning at curriculum area level</li> <li>Regular curriculum team meetings</li> </ul>	<ul> <li>Managers and Directors monitor course PIs</li> <li>Self-evaluation reporting monitored by Performance</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>College wide enhancement plan developed from self-evaluation</li> <li>Action planning from portfolio reviews</li> </ul>	<ul> <li>College wide enhancement plan monitored annually</li> <li>Annual portfolio review to examine improvement actions</li> <li>Regular reportage on performance to SLT</li> <li>Reportage to L&amp;T Committee on College wide self - evaluation and portfolio reviews</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies	<ul> <li>Annual scrutiny by Education Scotland annually by HMI and STMs</li> <li>Self-evaluation reportage to Scottish Funding Council</li> </ul>	<ul> <li>Reportage by Education Scotland presented to the BoM</li> <li>SFC Outcome Team monitor returns and provide feedback as required</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
LIKELIHOOD of the risk occurring?	3/5	of the risk?	4/5	score? (A x B)	12/25

Risk Status	Meeting 1	Meeting 2	Meeting 3	Meeting 4
	SIG	SIG	SIG	

MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	No change by Owner L&T discussed Risk 8 and whether the impact of the recent industrial action and ASOS has impacted performance levels and increased the risk. As strike action has now ceased, it was agreed that the Risk will be reviewed again in January 2024 when it will be clear whether further industrial action will be taken and the impact this may cause.
Q3	No change by Owner
Q4	

No. Risk a Appeti	nd Risk te A	void	Averse	Cautious	Moderate	Open	Hungry
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8	Failure to achieve highest academic performance levels						
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# Strategic Objective:

# Risk No 9: Failure to adhere to academic compliance

Reference to	Organisational
Departmental Risk	
Registers:	
Owner:	DP Learning Skills and Student Experience
Description of the	Failure to adhere to academic compliance arrangements, eg awarding
Risk:	bodies, Education Scotland
What are the possible	
consequences if the	Loss of reputation, financial loss, loss of ability to deliver and develop new
risk was to emerge:	courses, loss of ability to issue international visas and impact on student
_	certification.

Numerical Scoring of Gross Risk (i.e. without controls in place)						
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk		
<b>LIKELIHOOD</b> of the risk occurring?	4/5	of the risk?	3/5	score? (A x B)	12/25	
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUN	Significant	risk				

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Assessor marks in line with national standards utilising awarding body resources.</li> <li>Action planning at curriculum area level</li> <li>Regular curriculum team meetings</li> </ul>	<ul> <li>Internal verifier appointed for each unit and a cycle of verification is followed.</li> <li>Self-evaluation reporting monitored by Performance</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>Management scrutiny of the cycle of verification and appointment of internal verifiers.</li> <li>Issues from internal verification are identified and action planned to ensure conformity with national standards.</li> <li>College wide enhancement plan developed from self-evaluation</li> </ul>	<ul> <li>Scrutiny of internal verification reports by managers.</li> <li>SLT scrutiny of annual verification activity.</li> <li>College wide enhancement plan monitored annually</li> <li>Reportage to L&amp;T Committee on College wide self - evaluation and portfolio reviews</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies	<ul> <li>External verification by awarding body according to an annual cycle and risk</li> <li>Annual scrutiny by Education Scotland annually by HMI and STMs</li> <li>Self-evaluation reportage to Scottish Funding Council</li> </ul>	<ul> <li>External verifier presents report of visit to curriculum and performance team.</li> <li>Performance directorate monitor external verification and report to SLT and the L&amp;T Committee.</li> <li>Reportage by Education Scotland presented to the BoM</li> <li>SFC Outcome Team monitor</li> </ul>

				returns and provide feedback as required		
Numerical Scoring of NET Risk (i.e. with controls in place) (2 cont)						
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk		
<b>LIKELIHOOD</b> of the risk occurring?	2/5	of the risk?	2/5	score? (A x B)	4/25	

g.			(• •	)	
Risk Status	Meeting 1 MIN	Meeting 2 MIN	Meeting 3 MIN	3	Meeting 4

MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	No change by Owner
Q3	No change by Owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Ope n	Hungry
9	Failure to adhere to academic compliance arrangements						

#### Strategic Objective: experience

### Risk No: 10 Failure to achieve an effective student

Reference to	Organisational
Departmental Risk	
Registers:	
Owner:	DP Learning, Skills and Student Experience (Inc Infrastructure/Marketing/ICT)
Description of the	Failure to achieve an effective student experience
Risk:	
What are the possible	
consequences if the	Loss of reputation in the region, financial sustainability, ability to attract future
risk was to emerge?	students, ability to retain students and potential to limit student progression.

Numerical Scoring of Gross Risk (i.e., without controls in place)									
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk					
LIKELIHOOD of the risk occurring?	3/5	of the risk?	4/5	score? (A x B)	12/25				
The <b>GROSS</b> risk is therefore: MIN/SIG/MAJ/FUND	Significan	t Risk							

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance)	<ul> <li>Clear arrangements for applications, onboarding and retention</li> <li>Student block surveys and Student Satisfaction and Engagement Survey (SSES)</li> </ul>	<ul> <li>Review of early student experience</li> <li>Performance return survey and SSES results to CMs</li> <li>Performance</li> </ul>

Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Student engagement prior to course start and on course</li> <li>Continuous self- evaluation and action planning by support and teaching areas</li> <li>Action planning at curriculum area level</li> <li>Regular curriculum team meetings</li> <li>Students' association officers' meetings with students</li> <li>Student focus groups</li> <li>Student class representatives input to course teams</li> </ul>	<ul> <li>enhancement measure support areas to improve the student experience</li> <li>Self-evaluation reporting monitored by Performance and Directors</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>College wide enhancement plan developed from self-evaluation</li> <li>Action planning from portfolio reviews</li> </ul>	<ul> <li>Monitoring of College wide enhancement plan</li> <li>Portfolio review to examine improvement actions</li> <li>Regular reportage on performance and student satisfaction to SLT</li> <li>Reportage to L&amp;T Committee on College wide self -evaluation, enhancement plan and portfolio reviews</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies	<ul> <li>Annual scrutiny by Education Scotland annually by HMI and STMs</li> <li>Self-evaluation reportage to Scottish Funding Council</li> </ul>	<ul> <li>Reportage by Education Scotland presented to the BoM</li> <li>SFC Outcome Team monitor returns and provide feedback as required</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont)								
What is the	(A)	What is the	(B)	What is the				
predicted		predicted IMPACT		total risk				
LIKELIHOOD of the	2/5	of the risk?	4/5	score?	8/25			
risk occurring?				(A x B)				
Ŭ								

Risk Status	Meeting 1 MIN	Meeting 2 MIN	Meeting 3 MIN	Meeting 4
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MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	No change by Owner
Q3	No change by Owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Ope n	Hungry
10	Failure to achieve an effective student experience						

# Strategic Objective: Risk No: 11 Failure to maintain systems and operable and secure ICT

Reference to	Organisational
Departmental Risk	
Registers:	
Owner:	VP People and Transformation
Description of the	Failure to achieve and maintain systems and operable and secure ICT
Risk:	
What are the possible	Serious impact to the college's ability to operate and deliver education to
consequences if the	students, financial loss, loss of data and reputation
risk was to emerge?	

Numerical Scoring of Gross Risk (i.e., without controls in place)								
What is the predicted	(A)	What is the	(B)	What is the				
LIKELIHOOD of the risk		predicted		total risk				
occurring?	4/5	<b>IMPACT</b> of the	5/5	score?	20/25			
		risk?		(A x B)				
The <b>GROSS</b> risk is								
therefore:(MIN/SIG/MAJ/FUN)	Major							
	_							

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Documented disaster recovery procedures</li> <li>Cyber Incident disaster recovery plan and training</li> <li>Staff CPD on business continuity areas including Cyber security</li> <li>Firewalls and antivirus software in place</li> </ul>	<ul> <li>Cyber exercises</li> <li>Regular planned security monitoring.</li> <li>Desktop DRP exercises carried out and reviewed regularly.</li> <li>Network traffic regularly monitored.</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management controls / Project assurance	<ul> <li>Regular internal review of security measures and action around areas of concern;</li> <li>Regular cyber/phishing exercises;</li> </ul>	<ul> <li>Feedback via SLT/ELT on monitoring statistics;</li> <li>Regular Board reporting around cyber position;</li> </ul>
INDEPENDENT ASSURANCE Internal Audit / external bodies	<ul> <li>CISO (Chief Information Security Officer) service in place through HEFESTIS.</li> </ul>	<ul> <li>Regular reporting and risk assessment.</li> <li>Audit Committee/BoM oversight</li> </ul>

Numerical Scoring of NET Risk (i.e., with controls in place)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
<b>LIKELIHOOD</b> of the risk occurring?	3/5	of the risk?	4/5	score? (A x B)	12/25

Risk Status	Meeting 1 SIG	Meeting 2 SIG	Meeting 3 SIG	Meeting 4

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MEETING	AMENDMENTS
Q1	No change by Owner.
Q2	No change by Owner
Q3	No change by Owner
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Open	Hungry
11	Failure to achieve and maintain systems and operable and secure ICT						

# Strategic Objective: Risk No: 12 Health & Safety Compliance

Reference to Departmental Risk Registers:	Organisational
Owner:	VP People and Transformation
Description of the	Failure to meet regulatory health & safety obligations
Risk:	
What are the possible consequences if the risk was to emerge?	Loss of reputation, financial penalties, criminal liability (corporate and individual)

Numerical Scoring of Gross Risk (i.e., without controls in place)					
What is the predicted	(A)	What is the predicted <b>IMPACT</b>	(B)	What is the total risk	
LIKELIHOOD of the risk occurring?	4/5	of the risk?	5/5	score? (A x B)	20/25
The <b>GROSS</b> risk is therefore: (MIN/SIG/MAJ/FUN)	Major Risk				

3 LINES OF DEFENCE	MITIGATIONS	MONITORING
FRONT LINE (Management Assurance) Operational Delivery /Systems /Quality Assurance /Supervision	<ul> <li>Reporting and review procedure including "near miss"</li> <li>Health and Safety IOSH training for staff</li> <li>Regular communication on responsibilities</li> <li>Specific communication at time of increased risk e.g.Covid, building works, adverse weather</li> </ul>	<ul> <li>Regular, formal Health &amp; Safety Committee</li> <li>New terms of reference agreed by Health &amp; Safety Committee</li> </ul>
OVERSIGHT OF MANAGEMENT ACTIVITY Internal Compliance and quality checks / Legal and Regulatory / Financial controls / Management	<ul> <li>Clear channels of communication regarding issues and preventative actions</li> </ul>	<ul> <li>Regular, formal Health &amp; Safety Committee</li> <li>Reporting to FGP Committee / BoM</li> </ul>

controls / Project	
assurance	
INDEPENDENT	<ul> <li>Internal Audit</li> </ul>
ASSURANCE	Public Health
	<ul> <li>Environmental Health</li> </ul>
Internal Audit / external	
bodies	

Numerical Scoring of NET Risk (i.e., with controls in place) (2 cont)					
What is the	(A)	What is the	(B)	What is the	
predicted		predicted IMPACT		total risk	
LIKELIHOOD of the	3/5	of the risk?	4/5	score?	12/25
risk occurring?				(A x B)	

Risk Status	Meeting 1 SIG	Meeting 2 SIG	Meeting 3 SIG	Meeting 4	
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MEETING	AMENDMENTS TO RECORD
Q1	No change by Owner
Q2	No change by Owner
Q3	No change to rating by owner.
	Front line monitoring: New terms of reference agreed by Health & Safety Committee
Q4	

No.	Risk and Risk Appetite	Avoid	Averse	Cautious	Moderate	Ope n	Hungry
12	Health & Safety compliance						



# **Dumfries and Galloway College**

**Internal Audit Progress Report** 

19 March 2024

This report is solely for the use of the persons to whom it is addressed. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party.

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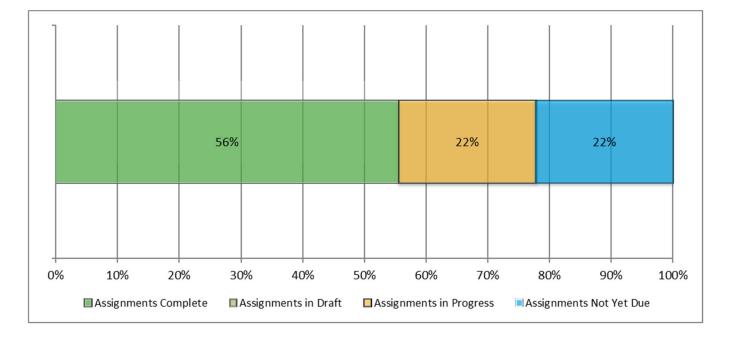
# 1. Key messages

The internal audit plan for 2023/24 was approved by the Audit Committee at the 13 June 2023 meeting.

This report provides an update on progress against that plan and summarises the results of our work to date.



The graph below provides a summary update on progress against the 2023/24 plan.



# 2. Reports

# 2.1 Summary of final reports being presented to this committee

This section summarises the reports that have been finalised since the last meeting.

Assignment	Opinion issued	Actions agreed		
		L	М	н
Financial Planning / Budget Monitoring (3.23.24)	Substantial Assurance	4	0	0
Objective:				
Given the uncertain financial climate and high rates of inflation, robust financial management is critical to good governance, decision-making and future success.				
Risk:	Minimal Assurance Partial Assurance Substantial Assurance Substantial			
Failure to achieve institutional sustainability.				
Conclusion:				
Overall, the College has in place good processes for developing and monitoring the budget, and the action We also note that the College is in the process of procuring a new finance system which may enable the			• •	ses.
Based on the testing we have completed during our this review, we have agreed four low priority mana	gement actions.			
GDPR (4.23.24)	Advisory Review	5	1	0
Objective:				
The College has adequate and effective policies and procedures in place to ensure that it complies with the requirements of the General Data Protection Regulation (GDPR).				

Assignment	Opinion issued	Acti	ions agi	reed
		L	М	н

#### Conclusion:

Our audit identified that, whilst the College has a control framework in place to manage GDPR, we identified areas for improvement where controls are not being complied with. In particular, we noted that whilst the College has recorded the retention periods for different data sets, this is spread out across multiple documents and, in some cases, the retention period is not clear. Whilst basic training has been rolled out for all staff, we noted a small number of exceptions where staff had either not completed training (though this was rectified by the end of our audit) or had not completed training in the required timeframe. Whilst basic training is mandatory for all staff, the College has not yet introduced (though is planning to do so) more advanced training for those with specific roles (such as Information Asset Owners). We also noted that the College's Register of Processing Activities (RoPA) does not clearly state whether a Data Protection Impact Assessment (DPIA) is required for some data sets.

As a result of our audit, we have agreed **one medium** and **five low priority** management actions. Further details of these actions can be found under section two of this report.

Risk Management (5.23.24)	Reasonable Assurance	4	5	0
Objective:	1			
We will consider the arrangements in place to identify, assess and monitor risks to the delivery of the College's objectives to ensure that decisions are made at the appropriate level and on a timely basis regarding mitigating actions.	Minimal assurance Partial assurance Substantial assurance Substantial			

#### Conclusion:

We found that the College has a clear Risk Management Policy in place, supported by a well-defined Risk Appetite statement. We further found that the process of risk management is well understood at a senior management level and risk reporting and discussions were well established and documented at this level, particularly with reference to Board and Audit Committee meetings.

However, we also noted issues with the format of the strategic risk register in that it was difficult to establish a clear distinction between existing controls and future mitigating actions, which could hamper the College's ability to clearly assess levels of residual risk against agreed levels of risk appetite and determine what further mitigating actions may be required, or what assurances need to be sought over controls or future mitigating actions.

As a result of these findings, we have agreed five medium priority and four low priority management actions.

# **2.2 Themes arising from control observations**

	Low	Medium	High
Policies and / or procedures	2	1	0
Other	1	0	0
Poor record keeping	1	0	0
Management or performance information	4	1	0
Governance weakness	2	0	0
Training / awareness for staff	2	2	0
Design of the control framework	1	1	0
Non-compliance with policies / procedures	2	1	0

We do not have any concerns in respect of themes arising to raise with the Committee at this stage.

# **Appendix A – Progress against the internal audit plan 2023/24**

Assignment and Executive Lead	Status / Opinion issued	Acti L	ons ag M	reed H	Target Audit Committee (as per IA plan 31 July 2024 / change control*)	Actual Audit Committee
FES Return	Reasonable Assurance	1	1	0	November 2023	November 2023
Student Support Fund	Substantial Assurance	0	0	0	November 2023	November 2023
Risk Management	Reasonable Assurance	5	5	0	November 2023	March 2024*
Financial Planning / Budget Monitoring	Substantial Assurance	4	0	0	February 2024	March 2024**
Awarding Body Activity	Planning document issued and agreed	-	-	-	June 2024	
	Fieldwork conducted week commencing 11 March 2024				June 2024	-
Student Onboarding	Fieldwork scheduled for week commencing 13 May 2024	-	-	-	September 2024	-
GDPR***	Advisory Review	5	1	0	September 2024	March 2024
Business Continuity Planning***	Planning document issued	-	-	-		
	Fieldwork scheduled for week commencing 10 June 2024				September 2024	-
Follow-Up	Fieldwork scheduled for week commencing 15 July 2024	-	-	-	September 2024	-

\* Delayed owing to Senior Auditor leaving.

\*\* Audit Committee scheduled for March, not February as per plan.

\*\*\* See changes below.

### **Appendix B – Other matters**

### Changes to the audit plan

Detailed below are the changes to the audit plan:

Note	Auditable area	Reason for change
1.	GDPR / Business Continuity Planning	<ul> <li>At the request of management, owing to the ongoing development of a new BCP Framework, we have agreed to swap these two audits from their original dates as follows:</li> <li>GDPR was scheduled for week commencing 6 June 2024 and was performed in week commencing 11 December 2023.</li> <li>BCP was scheduled for week commencing 11 December 2023 and will now be performed in week commencing 6 June 2024.</li> <li>Audit Committee due dates have been adjusted accordingly.</li> </ul>

### **Quality assurance and continual improvement**

To ensure that RSM remains compliant with the IIA standards and the financial services recommendations for Internal Audit we have a dedicated internal Quality Assurance Team who undertake a programme of reviews to ensure the quality of our audit assignments. This is applicable to all Heads of Internal Audit, where a sample of their clients will be reviewed. Any findings from these reviews being used to inform the training needs of our audit teams.

The Quality Assurance Team is made up of; the Head of the Quality Assurance Department (FCA qualified) and an Associate Director (FCCA qualified), with support from other team members across the department.

This is in addition to any feedback we receive from our post assignment surveys, client feedback, appraisal processes and training needs assessments.

### Post assignment surveys

We are committed to delivering an excellent client experience every time we work with you. Your feedback helps us to improve the quality of the service we deliver to you.

Currently, following the completion of each product we deliver we attached a brief survey for the client lead to complete.

We would like to give you the opportunity to consider how frequently you receive these feedback requests; and whether the current format works. Options available are:

- After each review (current option).
- Monthly / quarterly / annual feedback request.
- Executive lead only, or executive lead and key team members.

### **Appendix C - Key performance indicators (KPIs)**

Delivery			Quality				
	Target	Actual	Notes (ref)		Target	Actual	Notes (ref)
Audits commenced in line with original timescales	Yes	Yes	*	Conformance with PSIAS and IIA Standards	Yes	Yes	
Draft reports issued within 10 days of debrief meeting	10 days	15 days**		Liaison with external audit to allow, where appropriate and required, the external auditor to place reliance on the work of internal audit	Yes	Yes	
Management responses received within 10 days of draft report	10 days	19 days		Response time for all general enquiries for assistance	2 working days	2 days	
Final report issued within 3 days of management response	3 days	3 days		Response for emergencies and potential fraud	1 working day	1 day	

Notes

\* This takes into account changes agreed by management and Audit Committee during the year. Through employing an 'agile' or a 'flexible' approach to our service delivery we are able to respond to your assurance needs.

\*\* Risk Management report delayed owing to Senior Auditor leaving.

### For more information contact

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+44 7791 237658

#### rsmuk.com

The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of Dumfries and Galloway College, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM UK Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

This report is released to you on the basis that it shall not be copied, referred to or disclosed, in whole or in part (save as otherwise permitted by agreed written terms), without our prior written consent.

We have no responsibility to update this report for events and circumstances occurring after the date of this report.

RSM UK Risk Assurance Services LLP is a limited liability partnership registered in England and Wales no. OC389499 at 6th floor, 25 Farringdon Street, London EC4A 4AB.



### DUMFRIES AND GALLOWAY COLLEGE

MEETING	
Agenda Item:	5
Paper No:	AUD0324-5.1

Date	19 <sup>th</sup> March 2024
Location	Teams
Title of Paper	Business Continuity Management Plan
Presented By	Joe McGraw / Billy Currie
Recommendation	Discussion
Appendix Attached	YES
Disclosable Under FOISA	YES

Read Time: 29 minutes

### 1. Recommendation

1.1 The Audit Committee are asked to discuss the new Business Continuity Management Plan

### 2. Executive Summary

- 2.1 Following a review of exiting Policies and Procedures internally, and subsequent work with Zurich as the Colleges risk management consultant, the Contingency and Disaster Management Procedure was identified as one need a major upgrade.
- 2.2 In creating this new plan, work has been undertaken with Zurich following their initial review. This includes initial training with a cohort of College Managers.
- 2.3 The purpose of the new plan is to provide a clear guidance on what the College will do in the event of an incident which can give rise to business disruption. The plan provides action checklists, decision logs, meeting arrangements and key responsibilities to be utilised in the event of an incident.
- 2.4 It will be noted that this plan will be a live document, subject to regular review and change due to the nature of the business. The plan must be tested at regular intervals in line with risk management best practice.

### 3. Context

3.1 For full context please refer to the appendix paper which contains the full plan. Please note that this will replace the College existing Contingency and Disaster Management Procedure which will be removed from circulation.

### 4. Strategic Implications

4.1 This paper is directly linked to all College Strategic Priorities.

### 5. Risk

Risk	Mitigations
Risk 5 – Business Continuity	Effective procedures, back-ups, checks, awareness and CPD covering all processes which could affect the Colleges ability to perform in a business as usual manner.

### 6. Implications

Financial	Yes	There could be financial repercussion in the event of being unable to deliver our business as usual due to a critical incident
Legal	Yes	The College may be unable to meet statutory obligations in the event of a critical incident. The College is legally obliged to have a number of policies and procedures in place which contribute to business continuity
Learning and Teaching	Yes	The Business Continuity Management Plan will positively impact Learning and Teaching as it provides a framework to ensure this can continue in some ways in the event of a critical incident
Equalities	Yes	The plan will ensure all college users are considered in the event of a critical incident.

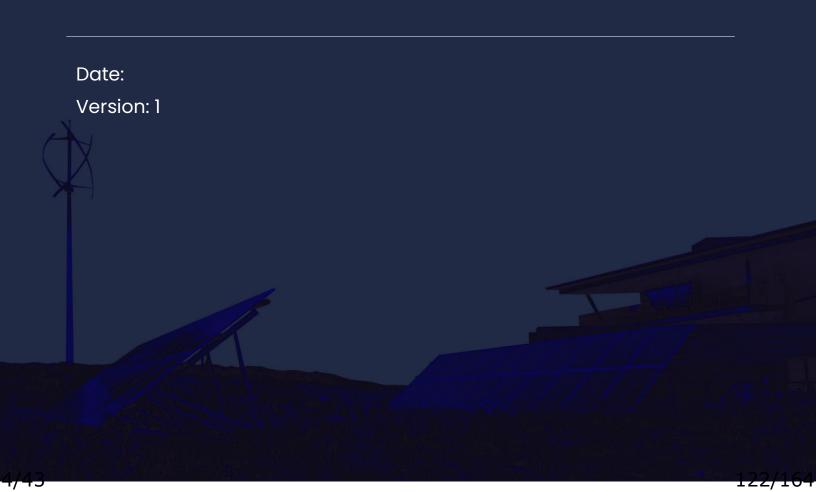
### Billy Currie

Director of Estates & Sustainability

28<sup>th</sup> February 2024



# BUSINESS CONTINUITY MANAGEMENT PLAN



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## **Business Continuity Management Plan**

### Introduction

Business Continuity Management (BCM) is the framework for Dumfries and Galloway College to update, control and deploy an effective process to prepare for, respond to and recover from major disruptive events, which could detrimentally affect College operations.

The source of the disruption may be caused by internal events such as loss of key staff, loss of use of a building, loss of digital systems, cyber attacks or a technological systems failure, or, it might be caused by an external influence such as adverse weather or a loss of utilities.

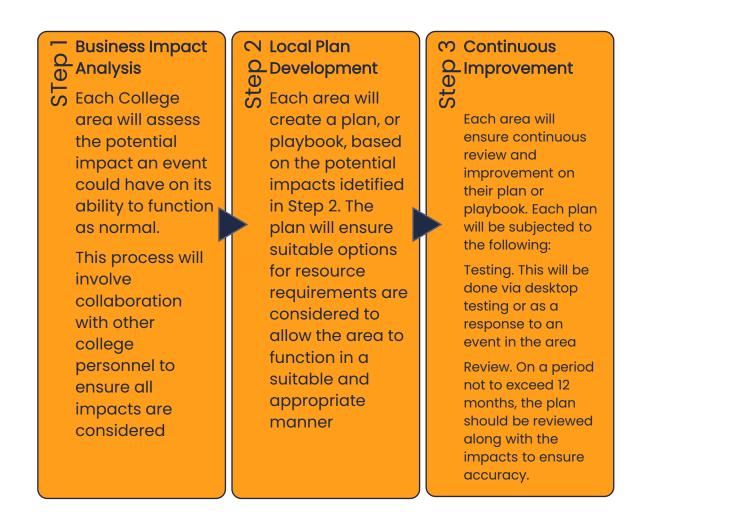
Dumfries and Galloway College has the following BCM objectives:

- To identify the major risk areas which could cause disruption to college business
- To establish defined plans to respond to critical incidents that cause a major disruption
- To establish BCM arrangements to respond to all identified risks
- To conduct regular reviews, audits and table top exercises of BCM plans, to ensure fit for purpose which lends itself to continuous improvement

- To raise the profile of BCM within Dumfries and Galloway College, and raise awareness to staff of BCM plans currently in place
- To work in partnership with other regional and national organisations to improve joint BCM planning, testing and review

### **Framework Statement**

This Framework demonstrates how the College improves its resilience to major disruptions, so that key business systems and processes can be recovered, and business as usual restored as quickly as possible. The Framework identifies three key steps to embedding the BCM plan within the College which should be followed:



### 3. Understanding Business Continuity Management:

Business continuity management is the process of planning for and dealing with potential threats and hazards to an organization's ability to maintain business continuity. This management requires: Evaluating the importance of different business functions in a business impact analysis

Business Continuity Management is, by nature, a reactive task. The Colleges overall methodology will consist of:

- Prepare Ensure all BCPs are in place and up to date
- Prevent Systematic monitoring of risks and avoiding complacency
- Respond Enact any BCPs in the event of an incident
- Return Return to business as usual in a timely manner

It is to be accepted that the College will not be able to control every eventuality, however it can control outcomes by following the methodology above and having all of the correct planning in place.

### **Critical Incidents:**

A Critical Incident is defined as 'a threat to the operation, safety or reputation of an organisation with an element of surprise and unpredictability, necessitating rapid and effective decision-making.

In a College context, this can take many guises and could include, but are not limited to:

- An incident affecting the immediate health and safety of staff or students
- An incident affecting the function of, or part of, the College buildings
- A business function incident preventing access to key operating systems
- External influences such as transport(network and infrastructure) or adverse weather

Critical Incidents should be viewed in 3 categories as follows:

Incident Level	Type and Response
Level 1 •	An inconvenient incident that will be
	dealt with internally, possibly by
	allocating staff and/or students
	alternative work /space within the
	building.
	Principal to be kept informed. Consider
	whether ELT/SMT should be
	put on amber alert for Crisis
	Management duties. Probably no need
	to invoke BCP.
Level 2 •	An incident involving the closure of
	buildings or a significant part of
	a building (e.g. classrooms/workshops,
	reception, entrance), or an incident
	adversely affecting more than 10% of
	staff or students.
	. Emergency
	response procedures insufficient
	beyond initial response. Principal
	to be informed immediately.
	Contact ELT/SLT for Crisis
	Management response and invoke BCP.
	<ul> <li>Managers to allocate priority work to essential staff.</li> </ul>
	ELT/SLT to consider using facilities on
	another unaffected part of
	the College. If appropriate, non-
	essential staff will remain at home
	and maintain contact with the College
	through a range of
	communication channels, including, for
	example, a dedicated part of

	the College's website and/or dedicated
	telephone lines.
Level 3 •	An incident that severely disrupts the
	College, resulting in the
	closure of one or more locations for at
	least 5-days. Emergency
	Response procedures insufficient
	beyond initial response. Principal
	to be informed immediately.
	<ul> <li>Form Crisis Management Team and</li> </ul>
	invoke BCP.
	The ELT/SLT, shall if necessary arrange
	for all critical data and
	other equipment to be removed from
	the affected site and relocated.
	IT services will set up in alternative
	sites. Staff and students will be
	kept informed of developments, with
	regular updates on the
	expected date of full recovery via the
	College's website and/or
	dedicated telephone lines. Alternative
	premises will be secured and
	equipped if the affected site(s) are
	expected to remain out of
	commission for more than 20 working
	days.

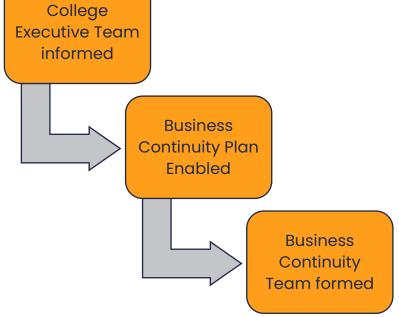
The following flow chart will show the processes to be used in the event of a Critical Incident occurring:



### **Enacting Business Continuity Management**

If an incident has been escalated to require the utilisation of a Business Continuity Plan then this must be escalated to the College Principal, Depute or Vice Principals immediately.

The following process will take effect upon escalation:



The Business Continuity Team(BCT) will take responsibility for monitoring and decision making in the event of an incident. The team will be available and will meet in person, or online, to ensure the College process is followed in a timely manner.

The BCT will consist of the following:

- Executive Team Member to chair
- Director of Estates and Sustainability
- Director of Curriculum
- Director of Finance
- Teaching and support TU members(1 from each TU)

- ICT Manager
- HR representative
- Marketing/Comms representative

The BCT will not be responsible for implementing any Business Continuity Plan, this will be the responsibility of the appropriate line manager or Senior Leadership Team member.

The initial meeting of the BCT will progress Stage 1, 'The Initial Crisis Management', the first meeting of the BCT will have the following key priorities;

• What are the key priorities of the organisation, what will be the key focus for the IMT?

The following agenda should be used to help shape the meeting

ltem	Торіс	Actioned (Yes/No)
1.	<ul> <li>Agree roles and responsibilities of the group</li> <li>Determine if additional members / deputies needed</li> <li>Ensure decision logs in place</li> </ul>	
2.	<ul> <li>Determine current status of incident         <ul> <li>review Incident Assessment forms</li> <li>review additional information sources / consider their reliability</li> <li>identify gaps in knowledge and actions to address gaps</li> <li>identify immediate actions to protection life and minimise damage to assets</li> </ul> </li> <li>Assess best outcome / worst outcome / most likely outcome</li> </ul>	

r		1
3.	<ul> <li>Identify if there are any regulatory requirements that need to be serviced and their prioritisation. Consider frequency of interaction with any external bodies/agencies as required</li> </ul>	
4.	• Determine what Legal action or advice is required	
5.	<ul> <li>Determine communication requirements for key stakeholders including staff, Board and key partners.</li> <li>Determine the media strategy to be implemented</li> </ul>	
6.	<ul> <li>Determine priorities giving consideration to timing / ongoing projects (see Section xx for list of Prioritised Services)</li> <li>Discuss and decide resource management plan</li> </ul>	
7.	<ul> <li>Determine any adjustments needed to facilitate emergency decision making and spending</li> </ul>	
8.	<ul> <li>Summary/AOB         <ul> <li>Ensure clarity on decisions and actions</li> <li>Agree date / time / location of next meeting</li> </ul> </li> </ul>	

### Ongoing meeting agenda

As the incident progresses the BCT will move towards Stage 2 'Recovery to enable business continuity'. This process will help to ensure that if key functions can be restored within an acceptable period, then staff will be notified of this timescale. Should it be considered that the incident is likely to last longer than is deemed acceptable the BCT will then assess what contingency measures need to be put in place. Ongoing meetings and their regularity will depend on the type of incident, but as a guide it should be sufficient to keep information collation, decision making and progress reporting manageable and effective.

Item	Торіс	Actioned (Yes/No)
1.	Current status of incident	
2.	Staff welfare issues	
3.	Actions from previous meeting	
4.	<ul> <li>Resource requirements for         <ul> <li>continuing incident response</li> <li>recovery of prioritised Services</li> </ul> </li> </ul>	
5.	<ul> <li>Communication requirements and resourcing         <ul> <li>new stakeholders</li> <li>impact of / feedback on messaging</li> <li>changed / new messaging</li> </ul> </li> </ul>	
6.	Changed legal / regulatory requirements	
7.	• Summary/AOB	

<ul> <li>Ensure clarity on decisions and actions</li> </ul>	
$\circ$ Agree date / time / location of next	
meeting	

### Stand Down and Post Incident Assessment

Following the restoration of the function(s) to allow service resumption a full review of the incident and the response will be required to take place. The aim of this is to highlight the strengths and weaknesses of the BCP which will be amended following the experience gained from the incident. A post incident checklist can be found in section

The final meeting agenda shown below should be used

Item	Торіс	Actioned (Yes/No)
1.	<ul> <li>Communication to stakeholders covering return to "business as usual"</li> </ul>	
2.	<ul> <li>Assign responsibility for final reporting to external agencies/bodies</li> </ul>	
3.	<ul> <li>Decision logs - finalised, collated, stored</li> </ul>	
4.		

	<ul> <li>Arrangements for incident debrief - to identify opportunities for improvement and any lessons learned</li> </ul>	
5.	• Arrangements to review the Business Continuity Plan in the light of the lessons learned	

### **Prioritised Services**

Included here a prioritised services map showing the timescales within which a minimum acceptable level of service must be provided;

	Timescale within which a minimum acceptable level of service must be provided				
Service / Business Activity	< 24hrs	1 day	2-3 days	1 week	2 weeks +
Learning Spaces					
Key Staff					
Estates					
Cleaning/Janitorial					
Service					
Telephone					
Systems					
ICT Systems					
Decant &					
rehousing					
Payroll					
Finance Services					
Premises					
Availability					

Supplier Payment			
(Plus)			
Procurement of			
Goods and			
services			
Treasury			
Management			
Office			
Accomodation			Key

### service Area Plans

See Appendix 1 for the key service area plan template which should be complete for all areas listed in the above table:

### Testing Business Continuity Arrangements

Testing of the business continuity arrangements are critical to ensuring the College remains prepared for any potential incidents. The following table will outline the Colleges preferred approach to testing its arrangements:

Approach	How we do it	What it does	How often its
			done
Component Test	Confirming that a key	Benefits: Provides a	Frequency: As
	procedure or piece of	more focused method	required - scheduled
	equipment that is	of testing key	compliance testing,
	relied on in an	procedures and	review after
	incident works. Could	equipment that are	component failure or
	be as simple as	central to a plan are	if recommended after
	checking that contact	sound. Limited	walkthrough,
	procedures work (e.g.	resources and time	rehearsal or real life
	checking phone	needed to implement	incident. Responsible:
	numbers on an	this option. Enhances	Component owner/s.

		formed the sector of the sector	
	emergency contact	familiarity with the	
	list).	plan and encourages	
		key people to question	
		and challenge the	
		assumptions made by	
		getting them to think	
		about real life	
		scenarios.	
Walkthrough	A structured	Enhances familiarity	Frequency: One
	discussion involving	with the plan and	Corporate BCM Plan
	key people	encourages key	per calendar year.
	responsible for	people to question	Department BCM Plan
	responding to service	and challenge the	rehearsals completed
	disruptions. Involves	assumptions made by	if/ as required or
	discussion of how the	getting them to think	requested by
	team would respond	about real life	SLT/Executive team
	in the event of	scenarios.	but not less than
	different types of		every 12 months.
	incident		, Responsible: Plan
			owner
Rehearsal / Table Top	Key people who you	A very realistic	Frequency: One
	rely on to respond to	exercise type which	Corporate BCM Plan
	College disruptions	provides a reliable	, per calendar year.
	rehearse their	test of the plan. It is	Department BCM Plan
	recovery, in real time	dynamic, which	rehearsals completed
	to an incident. People	ensures that lessons	if/ as required or
	play set roles either as	learnt and the value of	requested by
	participants or as	business continuity is	SMT/Executive team.
	facilitators. The	strongly reinforced.	Responsible: SMT/
	scenario is highly	Highly effective form	Executive team.
	controlled, with use of		
		of training as this	
	a script to prompt interactions to strict	allows people to	
		practice how they	
	timescales.	would respond to an	
		incident in a way	
		which is very	
		memorable.	

Following on from any real life incident or testing process a lessons learned exercise should be held and actions documented and communicated.

This could be a debrief with fire marshals after an evacuation or with key staff after major IT service loss but the approach should be the same in that open communication to understand any challenges faced should be allowed and documented afterwards.

Any updates required to polices and procedure would then be issued on to College committees or groups as required in line with Corporate Governance.

### **Corporate Governance**

College Management Team	Responsible for overseeing all BIAs,
	Operational BCM plans,
	implementation and validation
	activities at departmental level.
	Responsible for discussing and review
	the departmental approach quarterly
	at management team meetings.
Risk Management and Assurance	Responsible for the corporate
Group	management and review of all BCM
	framework and policy matters within
	the College. Responsible for linking the
	BCM framework to the risk
	management arrangements within the
	College. Responsible for testing and
	validating Corporate BCM Plans.
Senior Leadership Team (SLT) &	Responsible for the BCM Framework.
Executive Leadership Team (ELT)	Provide reports to Audit and Risk
	Assurance Committee / Board of
	Management. Coordinating internal
	and external audit activity with regard
	to BCM. Responsible for leadership in

	respect of critical incident
	management and invoking BCM plans.
Audit and Risk Assurance committee +	Responsible for strategic scrutiny and
Board of Management	assurance of the BCM framework and
	policy, and ensuring internal controls
	are in place.
Internal Auditors	Responsible for providing an objective
	analysis and evaluation of the BCM
	framework and policy, BIAs and BCM
	plans, and proposing any consequent
	improvement actions.

### Appendix 1 – Key Area Service Plans

This document is to be used for all key areas to determine immediate, medium and long term actions to follow during a service disruption. For guidance, the following should be adhered to for timeframe measuring: Immediate – Not to exceed 24 hours Medium – Not to exceed 1 week

Long – Not less than 1 week

Sign off will be done by the responsible owner and the form will be held in the central business continuity file log.

Action	Timeframe (immediate, medium or long)	Responsible Owner	Notes	Sign off
1				
2				
3				
4				
5				

### Appendix 2 – Key Contacts Staff

Name	Position	Phone	Email
Joanna	Principal and	Home:	
Campbell	CEO	Mobile	
Douglas	Depute	Home:	
Dickson	Principal	Mobile:	
Joe McGraw	Vice Principal	Home:	
		Mobile:	
Billy Currie	Director	Home:	
		Mobile	
Phil Storrier	Director	Home:	
		Mobile	
Karen Hunter	Director	Home:	
		Mobile:	
Billy McMillan	Director	Home:	
		Mobile:	
Kate Glendye	Director	Home:	
		Mobile:	
Calum Rodgers	Digital Services	Home:	
	Manager	Mobile:	
Lorraine	Secretary to the	Home:	
Grierson	Board	Mobile:	
Mary	Pa to Principal	Home:	
Cheetham		Mobile	
Alex Elkins	Executive	Home:	
	Assistant	Mobile	

Company	Service	Account Number	Phone number
Scottish Power	Electricity Supply		08000929290
Scottish Water	Water Supply		0800 077 8778
Scottish Gas	Gas Supply		0800 111 999
Moffat Fire and	Fire and		01461 339900
Security	Security Alarms		07774 000300
Croma Vigilant	Security Guarding		01387 247842
Kirsty Forsyth	Insurance		07767 225537
Zurich	Services		
Municipal			
Scottish Fire	Fire Service		01387 252222
and Rescue			
Service			
lan Morris	Emergency Joiner		07880936037
JC Martin	Emergency		07921 318556
	Electrician		
Jim Dalziel	Emergency		01387 265543
	Plumber		
Glass and	Emergency		01387 253029
Glazing	Glaziers		

### Appendix 3 – Emergency Action Task Lists

Fire Evacuation		
Responsible	Action	Action Taken
All on Discovery	Raise the alarm by activating the fire alarm call point. Most of these are close to exits on each floor.	
All on Discovery	Notify Reception/ Fire Wardens as to location and extent of the fire.	
	The fire alarm will be a continuous sounder	
Reception	Notify the Fire Brigade.	
Duty Manager/BCT Lead	Evacuate the premises to external assembly points.	
Receptionist	Remove visitors and contractors book.	
Fire Wardens	Assist in clearing the building if safe to do so	
Fire Wardens	Ensure staff members do not stop to collect personal belongings.	
Duty Manager/BCT Lead	Liaise with Emergency Services advising as to location and severity of fire and evacuation status.	
Fire Wardens	Ensure each Department is content that all members of staff and visitors are accounted for. If not the Emergency Response Team Leader/ Emergency Services must be informed immediately.	
All	Follow advice of Emergency Services.	
Duty Manager/BCT Lead	Advise staff to return to the building on the advice of the Emergency Services.	

### Gas Leak

Responsible	Action	n Action Taken	
All on Discovery	Notify Reception.		
Reception	Notify Duty Manager and Estates Team Leader/Director of Estates		
Duty Manager	Assess if evacuation is required		
Duty Manager	Consider if emergency services should be informed.		
Reception	Notify Emergency Services if required		
Estates Personnel	Notify Scottish Gas Networks: 0800 111 999		
Trained Staff	Turn off the meter at the control valve or gas slam valve if safe to do so.		
Fire Wardens	Open doors and windows to vent gas if safe to do so		
Duty Manager/BCT Lead	Evacuate the premises using Fire Wardens to notify everybody of evacuation.		
Fire Wardens	Ensure everyone knows it is a gas leak and smoking is not under any circumstances permitted.		
All Staff	<b>DO NOT</b> smoke in or near the premises.		
All Staff	<b>DO NOT</b> turn electrical switches on or off.		
Duty Manager/Estates Personnel	Consider evacuation point and move further away from the building if appropriate.		
Emergency Response Team Leader	Consider requirement to notify neighbours.		
Fire Wardens	Ensure everyone notified of change of assembly point.		
Duty Manager/Estates Personnel	Liaise with Scottish Gas Networks: 0800 111 999 and Emergency Services.		
Duty Manager/Estates Personnel	Advise on any additional action to be taken.		

Duty Manager/BCT Lead	Once all clear given return to the building.	

### Water Damage

Responsible	Action	Action Taken
All on Discovery	Notify Reception and manager in affected area who in turn will notify Estates.	
Designated Staff	If safe to do so move computers and other portable electrical equipment, files and furniture out of harm's way.	
Duty Manager/BCT Lead	Consider requirement to evacuate premises. Evacuation would be co-ordinated by Fire Wardens.	
Designed Trained Staff or Plumber	Where appropriate turn off the water supply at the stopcock. Contact plumber if required. Telephone:	
Designated T r a i n e d Staff	Turn off/ isolate gas and electrical supplies if a causefor concern and only if safe to do so.	
Duty Manager.Estates Personnel	Await plumber and follow any advice given by phone in the interim.	
Duty Manager/BCT Leade	Once under control notify building users.	
Duty Manager/Estates Personnel	Consider requirements to partition off affected areas for safety using high visibility tape.	
Estates Personnel	Obtain dehumidifiers. Telephone local suppliers including HSS or Hire and Supplies	
Plumber	Repair fault and reinstate water supply.	

### **Power Failure**

Responsible	Action	Action Taken
All	Notify Reception on discovery	
Reception	Notify Duty Manager and Estates team immediately	
Estates	Establish if failure is internal or external	
Estates	If power loss is established due to internal fault Estates personnel will check RCDs and contact electrician if required.	
Estates	Call electrician JC Martin, Derek Mitchell, Lotus.	
Estates Personnel	If external ring Power Supply Company and determine problem and likely duration of power loss.	
Estates Personnel	Power loss phone number. Telephone 0800 092 9290 or 105	
Affected Departments	UPS will kick in and maintain power supply to allow safe shutdown of ICT systems and provide Central Lift. Battery unit will allow for 3 hour emergency lighting to allow safe evacuation	
Affected Departments	Begin safe shutdown of equipment and backup of data.	
Duty Manager/BCT Lead	Evacuate building if power loss presents a safety hazard.	
Estates and ICT Departments	If an emergency generator is in use, check generator running conditions and fuel levels.	
Estates	Order additional fuel if necessary.	
Duty Manager/BCT Lead	Brief department managers on estimated outage and agree an appropriate course of action	
Dept. Managers	Brief staff	

### Loss of Water

Responsible	Action	Action Taken
All	Notify reception on discovery	
Reception	Notify Estates Team	
Estates	Determine if water loss is internal or external	
Estates	If water loss determined to be internal – contact plumber. Jim Dalziel/S&D	
Estates	If water loss external find out from the Water Supplier how long water is likely to be off. Telephone: Scottish Water 0800 077 8778	
Estates	Consider requirement to shut down boilers, including pumps and other associated water devices which could cause damage	
Duty Manager/BCT Lead	If the water is to be off for a long period of time, find out whether any nearby occupancy still has water and establish if their facilities can be used.	
Duty Manager/BCT Lead	Consider requirements for purchase of additional bottled drinking water	
Duty Manager/BCT Lead	Consider requirement for hire of portaloos	
Duty Manager/BCT Lead	Brief managers on short term alternate arrangements	

# Loss of Gas Supply

Responsible	Action	Action Taken
All	On discovery notify reception and Duty Manager who in turn will notify Estates Team	
Estates	Turn gas off at meter (to prevent dangerous build up on restart) – use qualified staff or contact GAS SAFE registered plumber. Contact Jim Dalziel or S&D for local plumber	
Estates Personnel	Find out how long supply likely to be out. Contact Scottish Gas Networks 0800 111 999	
Duty Manager	Notify affected departments and update as required	
Duty Manager/Estates Team/BCT Lead	In winter or colder periods consider the use of temporary heaters.	
Estates Team	If safe to do so, and network provider confirm all ok, re- instate gas supply and check all gas reliant equipment is functional including boilers and kitchen equipment.	

### **Denial of Access**

If access to organisation offices is denied by an outside event staff:

Action	Action Taken
Should follow directions of emergency services.	
Should <b>not attempt</b> to access the building.	
Liaise with duty manager or estates personnel concerning personal belongings.	
College communications process should be used to advise staff whether to attend work once situation is determined.	
The ELT/SLT/BCT will determine next course of action.	
Should follow directions of emergency services.	

### **Building Lockdown**

There are important differences between the lockdown and shelter arrangements. Lockdown is necessary when students, visitors and staff need to be **locked** within buildings for their own safety i.e. in an emergency situation such as a hostile intruder, terrorist attack or other criminal activity.

### Signals

Alarm or signal for lockdown shelter	
Signal for stand down / all-clear	

### **Incident Control Officers & Response Team**

Role	Name	Emergency Contact Number
Incident Control Officer	Senior Leadership Team	
Deputies	College Management Team	
Communications Officer	Marketing Team Leader	

It is important to remember that it is very much **the exception** to evacuate a building in the event of a hostile intruder. Unless the location of the intruders is known, a "blind" evacuation may be putting people in more danger (e.g. from an intruder or device at one of the entrances/exits) than if they had remained within the building.

#### Rooms most suitable for lockdown

1 Classrooms 2 Hall 3 Sports hall

4 Offices

It is important to make sure that items that could be used as weapons (kitchen implements, sports equipment, tools, cleaning products) are securely locked away when not in use.

#### **Communication arrangements**

Wherever possible use silent communications and keep noise to a minimum especially if the intruders are close by. Make sure any communications devices are secure and cannot be intercepted.

Two-way radios

Classroom telephones

Mobile phones

Instant messaging / email

pg. 30

Alternative place of safety in the event that it is considered necessary to leave site (for example, partner school/college / leisure centre) <u>must be pre-arranged.</u>		
Name of venue	Easterbrook Hall	
Type of venue	Event space/Secure Hall	
Contact name	Gordon Clark	
Contact telephone number		
Venue is located 0.6mi from College campus, suitable transport distance for persons of all physical abilities due to road network. Event space up to 1000 persons with 4 side rooms available for a further 720 persons		

#### Other useful contacts:

Name	Emergency Contact Number
Police Scotland	101/999
Croma Vigilant	01387 247842

Action Plan	Completed by (sign and time)
Sound Alert - Activate lock-down procedures immediately	
Dial 999	
Direct all students, staff and signed in visitors to the nearest safe place (this may be dependent on what and where the risk is)	
Secure rooms and take action to increase protection from attack - Lock and barricade doors and windows	
Close windows / blinds	
Turn off the lights, fans or mobile air conditioning units (this will reduce noise and the risk of exposure to any chemical/biological attack)	
Hide, sit on the floor under desks, and away from windows	
Stay as silent as possible - put any mobile devises to silent (consider writing / displaying instructions on whiteboards / TV's etc as long as it can't be seen by the intruder)	
Ensure that students, staff and visitors are aware of an exit point in case the intruder does manage to gain access	
If possible, check for missing / injured students, staff and visitors	
Keep doors and windows locked shut and remain inside until an all-clear has been given, or unless told to evacuate by the emergency services	

### **Severe Weather**

### Action

#### Advance actions to be taken upon forecast of severe weather:

- Check windows, close shutters, nail down and brace loose frames.
- Board up openings if necessary.
- Secure loose objects in the open.
- Move drums of chemicals/ fuels to safety.
- Inspect and secure roof and loose coverings.
- Ensure gutters, drains etc. are cleared.
- Obtain sandbags/ barriers and utilise as appropriate.
- Evaluate requirements to isolate utilities.
- Move stored goods out of reach of water damage.
- Move or cover machinery and plant.
- Consider personal protective equipment requirements for staff.
- Determine if staff should be asked not to attend work/be sent home (refer to Adverse Weather Procedure)
- Ensure adequate stock of food/ water etc.
- Check adequacy of current fuel stock for standby generators.

#### Actions to be taken during severe weather:

- Ensure staff are located in a place of safety.
- Monitor weather forecasts/ local radio/local resilience partnership.
- Liaise with Emergency Services and wider regional partners concerning recommended course of action.
- Ensure staff do not put themselves at risk.
- Keep staff informed.

#### Actions to be taken post event:

- Make arrangement to secure dangerous areas physical barriers/ high visibility tape etc.
- Consider short-term security issues.
- Assess initial damage.
- Begin salvage limit access to appropriate staff and ensure appropriate PPE in use.
- Restore utilities.
- Review effectiveness of preparations.
- Restock any emergency supplies utilised.

### BOMB THREATS CHECKLIST

#### ACTIONS TO BE TAKEN ON RECEIPT OF A BOMB THREAT

- 1. Remain calm and talk to the caller
- 2. Note the caller's number if displayed on your phone
- If the threat had been sent via email or social media, see appropriate section below
- 4. If you are able to, record the call
- 5. Write down the exact wording of the threat:

### ASK THESE QUESTIONS AND RECORD ANSWERS AS ACCURATELY AS POSSIBLE:

1. Where exactly is the bomb right now?	7. What is your name?		
2. When is it going to explode?	8. What is your address?		
3. What does it look like?	9. What is your telephone number?		
4. What does the bomb contain?	10. Do you represent a group or are you acting alone?		

5. How will it be detonated?	11. Why have you placed the bomb?			
6. Did you place the bomb? If not you, who did?	12. Record time completed:			

#### INFORM BUILDING SECURITY OR COORDINATING MANAGER

### DIAL 999 AND INFORM POLICE

Name and telephone number of person informed:

Time informed:

This part should be completed once the caller has hung up and police / building security / coordinating manager have all been informed.

Date and time of call:	Duration of call:	The telephone number that received the call:
About the caller:		
Male	Female	Age
Nationality		
Threat language:		
Well spoken	Irrational	Tape d
Foul	Incoherent	
Caller's voice:		

	Calm	Slurred	Lisp	Familiar (if so, v	who did it sound like?)
	Crying	Excited	Rapid		
	Clearing throat	Stutter	Deep	Accent (If so wh	nat accent?)
	Angry	Disguised	Laughter		
	Nasal	Slow	Hoarse		
Oth	ner (please specify)				
Ot	her sounds:				
	Street noises	Motor	P	Asystem	Office machinery
	House noises	Clear	В	ooth	Other (please
	- Animal noises	Voice	м	usic	specify)
	Crockery	Static	Fa	actory machinery	
Po	marks				
Re					
Ad	ditional notes				

Signature:	
Print name:	
Date:	

# ACTIONS TO BE TAKEN ON RECEIPT OF A BOMB THREAT SENT VIA EMAIL OR SOCIAL MEDIA

- 1 Do not reply to, forward or delete the message
- 2 If sent via email, note the address
- 3 If sent via social media, what application has been used and what is the username/ID?
- 4 Dial 999 and follow police guidance
- 5 Preserve all web log files for your organisation to help the police investigation (as a guide, 7 days prior to the threat message and 48 hours after)

# SAVE AND PRINT - HAND COPY TO POLICE AND SECURITY OR COORDINATING MANAGER

Retention period: 7 years

Appendix 4 – Incident Report Form					
Incident detail					
Time and date of report					
Name of person making the report					
Questions	Noted By	Record Information here			
What has happened, e.g. fire, explosion, theft, malicious damage, water damage, power failure, denied access?					
<ul> <li>Who is involved – any casualties:</li> <li>Any injury reports?</li> <li>Any staff, visitor or contractor injuries or fatalities?</li> <li>Where are staff now? – evacuated, or not</li> <li>Have incident services (fire, police, ambulance)/ local authority been called?</li> </ul>					
When did it occur?					
Where is the problem?					

Why did it happen? If known at this stage.	
Who is in charge of the situation?	

### Appendix 2 – Incident Logs

The progress of the individual tasks during an incident must be recorded in order to maintain a reliable picture of the current circumstances and for any post incident investigations. A copy of this form should be retained in the Business Continuity Folder within the College Management Teams file

Incident Description				
Location Affected				
Date / Time Incident Com	nmenced			
Loggist name				
Sheet No.		Sheet	total	
Circumstance / Issue / Do	ecision Taken		Date Time	Responsible Person
			I	