# CITY OF GLASGOW COLLEGE

# Board of Management
# Audit and Assurance Committee

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| **Date of Meeting** | **Wednesday 16 September 2020** |
| **Paper No.** | **AAC1-I** |
| **Agenda Item** | **5.3.3** |
| **Subject of Paper** | **Internal Audit Report – External Communications & Marketing** |
| **FOISA Status** | **Disclosable** |
| **Primary Contact** | **Henderson Loggie** |
| **Date of production** | **September 2020** |
| **Action** | **For Discussion and Decision** |

**Recommendations**

The Committee is asked to consider and discuss the report and the management responses to the internal audit recommendations.

1.    **Purpose of report**

The purpose of this review is to provide management and the Audit and Assurance Committee with assurance on key controls relating to the curriculum and financial plans in place for City of Glasgow College and their alignment with the regional plan for Glasgow and the college student number targets.

2.    **Context and Discussion**

This internal audit of External Communications and Marketing provides an outline of the objectives, scope, findings and graded recommendations as appropriate, together with management responses. This constitutes an action plan for improvement.

The Report includes a number of audit findings which are assessed and graded to denote the overall level of assurance that can be taken from the Report. The gradings are defined as follows:

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

3.    **Impact and implications**

Refer to internal audit report.

# City of Glasgow College

## External Communications and Marketing

**Internal Audit Report No: 2020/07**

**Draft issued:  7 September 2020**

**Final issued:  11 September 2020**

**LEVEL OF ASSURANCE**          **Satisfactory**

Now, for tomorrow

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# Contents

## Level of Assurance

In addition to the grading of individual recommendations in the action plan, audit findings are assessed and graded on an overall basis to denote the level of assurance that can be taken from the report.  Risk and materiality levels are considered in the assessment and grading process as well as the general quality of the procedures in place.

Gradings are defined as follows:

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

## Action Grades

| Priority 1 | Issue subjecting the organisation to material risk and which requires to be brought to the attention of management and the Audit Committee. |
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| **Priority 2** | Issue subjecting the organisation to significant risk and which should be addressed by management. |
| **Priority 3** | Matters subjecting the organisation to minor risk or which, if addressed, will enhance efficiency and effectiveness. |

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# Management Summary

## Overall Level of Assurance

| Satisfactory | System meets control objectives with some weaknesses present. |
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## Risk Assessment

This review focused on the controls in place to mitigate the following risks on the City of Glasgow College ('the College') Strategic Risk Register:

- Negative Impact of industrial action;
- Failure to achieve improved business development performance with stakeholders; and
- Negative impact upon college reputation.

## Background

As part of the Internal Audit programme at the College for 2019/20 we carried out a review of the College's External Communications and Marketing arrangements. The Annual Plan, approved by the Audit and Assurance Committee in November 2019, identified this as an area where risk can arise and where Internal Audit can assist in providing assurances to the Board of Management and to the Principal that the related control environment is operating effectively, ensuring risk is maintained at an acceptable level.

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## External Communications and Marketing

## Scope, Objectives and Overall Findings

This audit considered the systems in place within the College for the management of positive and negative publicity externally.

The table below notes the objective for this review and records the results:

| Objective | Findings | | | |
|---|---|---|---|---|
| **The specific objectives of this audit were to obtain reasonable assurance that:** | | **1** | **2** | **3** |
| 1. Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation. | **Satisfactory** | 0 | 0 | 2 |
| | | **0** | **0** | **2** |
| **Overall Level of Assurance** | **Satisfactory** | System meets control objectives with some weaknesses present. | | |

## Audit Approach

The Vice Principal Corporate Development & Innovation, Associate Director Brand & Communications and Director of Student Experience were interviewed to determine current working practices.

The College's internal and external communication strategies, policies and procedures were reviewed, and their content benchmarked against good practice, identifying any areas requiring improvement.

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**External Communications and Marketing**

## Summary of Main Findings

*Strengths*
- A Communications Strategy, Communications Policy and Social Media Policy are in place to provide staff with a framework for external communications;
- Procedures are Guidelines are sent to all staff regarding External Communications to keep them informed and up to date;
- The College uses various channels for External Communication and Marketing and is proactive in maximising the benefits of positive publicity, through the use of a Communications Calendar;
- All members of the Executive Leadership Team have been provided with Media Training and are provided with regular refreshers; and
- There is now increased collaboration across the Glasgow Region in regard to communications, through a Marketing and Communications Steering Group.

*Weaknesses*
- The College's Communications Strategy, Communications Policy and Social Media Policy are past their review date and require to be reviewed and updated; and
- There is no clear Communication Plan for students to ensure that expectations are met and that communication activity is planned by staff to meet these expectations.

## Acknowledgements

We would like to take this opportunity to thank the staff at the College who helped us during our audit.

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# Main Findings and Action Plan

**Objective 1: Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation.**

**Policies and Procedures**
The College has in place a Corporate Communications Strategy and Communications Policy which outlines the framework for the College's internal and external communications. There is also a Social Media Policy in place which provides guidance to staff and students on the use of social media and Editorial Guidelines for those publishing online content for the College. These are currently available on the College intranet. Procedures and other guidance relevant to external communications, such as guidance on corporate email, are circulated to all staff by email.

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## External Communications and Marketing

| Objective 1: Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation. (Continued) | | | |
|---|---|---|---|
| **Observation** | **Risk** | **Recommendation** | **Management Response** |
| We reviewed The Corporate Communications Strategy and identified that it covered the period 2015 – 2017. It was highlighted for our discussion with staff that the College's Strategic Plan will be reviewed in light of COVID-19 and this will necessitate a further review of the Communications Strategy.<br><br>We noted that there had been a restructuring of the Marketing and Communications function during academic year 2018/19. Our review of the Communications Policy identified that this document was due to be reviewed in Spring 2017 and referenced roles and responsibilities which pre-date the restructuring of Marketing and Communications. We also noted that the Social Media Policy was due to be reviewed in 2017 and is therefore also overdue for review. | Strategies and Policies may not be up to date and staff may not be aware of roles and responsibilities in relation to communications and marketing. | **R1** A formal review of the College's Communications Strategy, Communications Policy and Social Media Policy should be conducted to ensure these documents are up to date; are aligned to the College's Strategic Plan and reflect current working practices. | As part of the Colleges Strategic Planning framework, a refreshed Corporate Development Strategy is planned for the end of September 2020. This will incorporate details of an updated Communications Strategy going forward.<br><br>The Communications Policy and Social Media Policy will be updated to reflect an accurate position on the use of internal & external mediums and our new Intranet by the end of October 2020.<br><br>**To be actioned by:** Vice Principal, Corporate Development & Innovation and Associate Director for Brand & Communications<br><br>**No later than:** 30 November 2020 |

| Grade | 3 |
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## External Communications and Marketing

**Objective 1: Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation. (Continued)**

We noted that External Communications and Marketing procedures are currently circulated to staff via email. We reviewed the most recent email communication and noted that it provided detailed guidance on the College's Communication protocol (covering All Staff communication, Alumni, Students, Website / Social Media, Media (Press) and Stakeholders / Political).

Through discussion with staff, it was highlighted that the current intranet capability is not being fully utilised, and this has prompted an overhaul of the intranet which is in early stages of development. We would suggest that the written Communication procedures should be made available to staff via the new intranet platform.

As part of the ongoing review of online communication platforms, the College are also developing procedures relevant to external audiences (such as procedures for booking events at the College) and these will be posted on the website in due course.

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## External Communications and Marketing

**Objective 1: Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation. (Continued)**

**Positive Publicity**
The College communicates with external stakeholders through a variety of channels such as printed prospectuses / handbooks, leaflets, advertisements, the College Website, open days, media releases and social media.

The College has a Communications Calendar in place, which sets out key events and communications for the College throughout the year. This assists the College to plan ahead in order to take advantage of the opportunities for positive publicity that they are aware of in advance. The College make use of an external digital marketing agency to help promote the courses they offer and also make use of a public affairs agency to help target influential stakeholders.

The College pro-actively contacts media outlets when there are positive news stories to promote, such as the opening of the new Campus or a new initiative.

It was noted that the College has a large number of live Social Media Accounts and these are increasing. This increase in the number of social media platforms had already been identified by the College and a review of these communication channels had been undertaken prior to the Covid-19 pandemic. The outcome of this review, together with relevant action points, will be subject to consideration by the Executive Leadership Team in due course.

**Negative Publicity**
The Associate Director Brand & Communications would be the nominated main spokesperson for the College in the event of any negative press coverage. A press release would be developed and approved by the Executive Leadership Team before being released. The College tries to actively avoid a "no response" in these circumstances and if the media enquiry was in relation to an issue under investigation, then a holding statement would be released until a full statement could be developed. Again, this would be approved by the Executive Leadership Team.

All members of the Executive Leadership Team, as well as the Associate Director Brand & Communications, have been provided with media training and receive regular refresher training.

If negative publicity is generated through social media channels then the College would either give an informed reply or remove the complaint from Social Media and discuss offline with the source of the publicity (where they can be readily identified). Again, all responses would be approved by the Executive Leadership Team before being released.

Responsibility for Incident Management rests with Executive Leadership Team and is set out in the Business Continuity Plan. There is also a Duty Manager for evenings and Saturday mornings when the College is open. This provides a contact should anything major occur who can then inform Estates and Facilities staff and managers, the Vice Principal Corporate Services or the Principal if required.

There is now increased collaboration across the Glasgow Region in relation to communications. A Marketing and Communications Steering Group is now in place with representation from GCRB and all three Glasgow Colleges. The GCRB representative sets the agenda and the three Colleges add to this as required. Also, network meetings are undertaken with the College Development Network to share intelligence and set statements have been prepared for a range of different scenarios to create improved consistency in the tone and content of communications across Scottish Colleges.

## External Communications and Marketing

**Objective 1: Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation. (Continued)**

| Observation | Risk | Recommendation | Management Response |
|---|---|---|---|
| It was noted through discussion with staff that there is no clear plan for communication with students throughout the full duration of their studies at the College. It was noted that there have been variable levels of expectations from students on the frequency and method of communication they should receive and this has led to some dissatisfaction from students in the past. Therefore, going forward we would suggest that it would be useful to document the standard communication that can be expected at each stage of the student journey, from application through to graduation. This would be useful to both students and staff within the College in terms of managing expectations and in planning communication activity. | Students may not have a clear idea of the frequency or type of communication they will receive at each stage of their studies. | **R2** Consideration should be given to the development of a specific Communications Plan for students which will set out the key communication milestones from application to graduation. | A full plan will be established which will set out both the timings and methods of communications to students throughout their studies. <br> Work will also take place with the Student Association 'CitySA' to fully engage in the student experience from application to graduation. <br><br> This communications plan will take into consideration areas such as guidance, timetable arrangements, blended learning, block changes, local and national surveys, career/progression advice and Alumni enrolment. <br><br> **To be actioned by:** Student Experience Director and Associate Director for Brand & Communications <br><br> **No later than:** 30 November 2020 |

| | Grade | 3 |
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