

Board of Management Audit & Assurance Committee

Date of Meeting	Tuesday 6 September 2022
Paper No.	AAC1-G
Agenda Item	5.2.2
Subject of Paper	Internal Audit Report – Business Continuity
FOISA Status	Disclosable
Primary Contact	Henderson Loggie
Date of production	29 June 2022
Action	For Discussion and Decision

1. Recommendations

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

2. 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.

3. Key Insights

This internal audit of Business Continuity 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.

4. Impact and implications

Refer to internal audit report.

LEVEL OF ASSURANCE

Good

City of Glasgow College

Business Continuity

Internal Audit report No: 2022/03

Draft issued: 13 May 2022

Final issued: 29 June 2022



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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 and Assurance Committee.
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.



Management Summary

Overall Level of Assurance

Good	System meets control objectives.
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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') Risk Register as at 24 February 2022:

- Risk 12 – Failure of Business Continuity (Net Risk Score 12, Amber)

Background

As part of the Internal Audit programme at the College for 2021/22 we carried out a review of the College's business continuity arrangements. The Audit Needs Assessment, agreed with management and the Audit and Assurance Committee in March 2022, identified this as an area where risk can arise and where Internal Audit can assist in providing assurances to the Board of Management and the Principal that the related control environment is operating effectively, ensuring risk is maintained at an acceptable level.

An effective Business Continuity Plan (Incident Management Plan) is essential to ensure that the College can, in response to a disaster or threat, continue to operate key activities and ensure that the interests of key stakeholders continue to be met.

A Strategic Review of Business Continuity Management was undertaken by Ashton Resilience in March 2018, for the College insurers UMAL. The review looked at the activities and operations of the College, its recovery capability and the degree to which Business Continuity Management had been implemented. A draft report was forwarded to the College on 16 April 2018, with detailed findings and recommendations. In summary the report found that the College had a 'well-developed operational response to incidents, however there was a need for all departments to develop, implement and maintain a functional recovery process'. This involved firstly conducting a business impact analysis then documentation of Business Recovery Plans for each area, based upon coherent recovery strategies. In January 2019 Ashton Resilience was engaged to conduct a full cross-College Business Impact Analysis, to inform the development of detailed Business Recovery Planning across all College teaching and support functions. This work was completed in September 2019.

At the outset of the COVID-19 pandemic in February / March 2020 the Covid-19 Advisory Group met daily, chaired by the Depute Principal, and considered a wide range of precautionary and business continuity issues. Business Recovery Plan owners were asked to review their plans with reference to the possibility of closure of College buildings, and the continuance of key functions, including student support and delivery of learning and teaching utilising alternative methods and technology. The Board and Senior Management Team oversaw a migration to remote working, learning and teaching, and all College operations, following closure of the College buildings on 17 March 2020. Operations protocols for the College campus sites were developed to minimise risk to staff students and visitors, as part of planning the return to building occupation.



Scope, Objectives and Overall Findings

The scope of this audit was to undertake a review of business continuity planning to consider whether there are adequate plans in place to minimise disruption to College operations following loss of life, buildings or equipment. This included a specific focus around the work that was undertaken to allow College operations to continue during the COVID-19 pandemic and reopen College campuses as the lockdown was eased. The review also looked at the student experience through the lockdown period.

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

Objective	Findings			
	1	2	3	
The objective of our audit was to obtain reasonable assurance that:				
	No. of Agreed Actions			
1. Business Continuity / Contingency Plans are in place covering all of the College's activities and locations;	Satisfactory	0	0	3
2. the Business Continuity Plans / Contingency Plans are workable, properly communicated to members of staff, and have been adequately tested;	Good	0	0	1
3. the processes and procedures in place follow recommended good practice;	Good	0	0	0
4. the work that was undertaken to allow College operations to continue during the COVID-19 pandemic minimised, as far as possible, the impact on the student experience; and	Good	0	0	1
5. appropriate preparations were made, and robust plans developed to ensure that College campuses could safely reopen when the COVID-19 lockdown was eased, taking into account all Scottish Government and Health and Safety Executive Guidance relevant to education providers.	Good	0	0	0
Overall Level of Assurance	Good	0	0	5
		System meets control objectives.		

Audit Approach

We obtained copies of Business Continuity / Contingency Plans in place and considered whether they covered all of the College's activities and locations. We also obtained and reviewed specific plans in place to continue College operations during the COVID-19 pandemic and plans developed for College campuses to reopen when lockdown restrictions were eased.



Audit Approach (Continued)

We also discussed the College's approach with the College Secretary / Director of Planning, Depute Principal and Chief Operating Officer, Vice Principal Corporate Services, Head of Facilities Management, Director of IT, Director of Student Experience, Student President, Student Engagement Manager, Students' Association Coordinator, Director of Excellence and a sample of Deans of Faculty.

An assessment of the key processes and internal controls was performed with reference to relevant good practice guidance.

Summary of Main Findings

Strengths

- An external Strategic Review of Business Continuity Management was undertaken in March 2018 for the College insurers;
- In January 2019 the same company was engaged to conduct a full cross-College business impact analysis, to inform the development of detailed Business Recovery Planning across all College teaching and support functions. This work was completed in September 2019;
- The current position is that 16 departmental Business Recovery Plans (BRPs) are in place, which cover all of the College's activities and locations. The ICT BRP is supported by a number of related plans;
- The BRPs proved extremely valuable during the COVID-19 pandemic and have been subject to regular review, most recently in February 2022 when a process started to revise the BRPs to include lessons learned from implementation;
- BRPs have been prepared using a consistent format, which reflects recognised good practice;
- There is also a College wide Business Continuity Plan (Incident Management Plan) in place, which is subject to regular review and updating, including to reflect COVID-19 protocols;
- An externally facilitated scenario test of the ICT recovery plans is scheduled for 2022;
- The Board and Senior Management Team oversaw the migration to remote working, learning and teaching, and all College operations, following closure of the College buildings on 17 March 2020. The College's ICT Team worked quickly to make this switch technically possible;
- The College invested heavily in laptops and chrome books so that all students in need had access although this was impacted by national supply issues;
- From a College point of view there was an emphasis on student engagement and ensuring that students were able to continue their learning although it is recognised that communication was an issue at first;
- Teaching staff were supported in the move to online delivery by the College Learning and Teaching Academy, which was able to accelerate its work in this area in order to meet the challenges presented by the COVID-19 lockdown;
- The Students' Association also moved its activities, including sports and societies, online. Engagement with students was increased including weekly emails 'WhatsOn'. National funding was made available to the Students' Association to fund a post to support mental well-being;
- Operations protocols for the College campus sites were developed to minimise risk to staff students and visitors, as part of planning the return to building occupation. The protocols were based on the Scottish Government's Coronavirus (COVID-19): guidance for colleges. 20 editions and updates have been produced to date;
- In addition to making the full protocols available to all staff on the College intranet, a 'Staff on Campus Guide' was also produced, as well as a parallel Student Guide;
- The arrangements for a safe return to College campuses has been a focus of discussion at the College Executive Leadership Team / Senior Management Team and Health and Safety Committee meetings throughout the pandemic;
- A system of risk assessments was developed and signed-off by the Health and Safety Committee and Trade Unions before being published and communicated to staff;



Summary of Main Findings (Continued)

Strengths (continued)

- The College received a proactive visit from the Health and Safety Executive's (HSE) HM Inspector of Health and Safety and a Local Authority Environmental Health Officer on 21 October 2020, which concentrated on the Hair and Beauty department. Although no formal report was received following the visit, we were advised that initial feedback from the HSE Inspector commended the College's systems and COVID-19 measures as some of the best practice they had observed; and
- A comprehensive report 'Delivering in a Pandemic' has been prepared which reflects on the College's response to the pandemic providing a detailed account of all the action taken and looking into the future. The College has established key lessons that it hopes will mean it is even more prepared for the task ahead.

Opportunities for improvement

- The Resource Recovery section of the departmental BRP asks the recovery plan owner whether an agreement is in place with regard to any of the resources required to aid recovery of operations. We noted from a review of departmental BRPs that there was a mix of Yes / No responses but that in those instances where a No response was provided there were no documented actions for the BRP owner to follow up. Also, where the answer was Yes, there may not be a formal agreement in place, just a historic informal arrangement which may or may not still be valid;
- It was also noted in the Resource Recovery section of the departmental BRPs, which were reviewed as part of our audit, that there was generally mention of 'remote working', without much further detail being provided. The design of the BRP template could be amended to specifically include a new section on remote working;
- For the sample of departmental BRPs reviewed we noted that there was inconsistency in completion of the Recovery Log section (Appendix I). This ranged from no entries at all or one line noting the move to remote working in March 2020, through to a comprehensive timeline of all the key actions undertaken throughout the COVID-19 pandemic;
- Although there has been 'live' testing of the College wide Business Continuity Plan (Incident Management Plan) and departmental BRPs throughout the COVID-19 pandemic and plans are in place for a scenario test of the IT recovery plan, going forward there should be regular scheduled testing of the plans including desktop walkthrough exercises and these should be included in a testing plan; and
- We discussed with College management, and staff interviewed as part of the audit, the method by which actions were recorded and allocated to responsible individuals during the COVID-19 pandemic. This was achieved in a number of ways, including through Team and Committee meeting minutes, although it is considered that there would have been benefit in using a consistent system for documentation across College departments, such as through the use of Microsoft Teams.

Acknowledgment

We would like to take this opportunity to thank the staff at the College and the Students' Association President and staff who helped us during the course of our audit visit.



Main Findings and Action Plan

Objective 1 - Business Continuity / Contingency Plans are in place covering all of the College's activities and locations

A Strategic Review of Business Continuity Management was undertaken by Ashton Resilience in March 2018, for the College insurers UMAL. The review looked at the activities and operations of the College, its recovery capability and the degree to which Business Continuity Management had been implemented.

A draft report was forwarded to the College on 16 April 2018, with detailed findings and recommendations. In summary the report found that the College had a 'well-developed operational response to incidents, however there was a need for all departments to develop, implement and maintain a functional recovery process'. This involved firstly conducting a business impact analysis (BIA) then documentation of Business Recovery Plans (BRPs) for each area, based upon coherent recovery strategies. In January 2019 Ashton Resilience was engaged to conduct a full cross-College BIA, to inform the development of detailed Business Recovery Planning across all College teaching and support functions. From April to July 2019 BIA meetings were undertaken throughout the College, between managers from all faculties and service areas with Ashton Resilience. This work was completed in September 2019.

We reviewed the work undertaken as part of the internal audit programme for 2018/19. In internal audit report 2019/20, issued on 6 November 2019, we reported that:

- BIAs had been completed and all departmental BRPs prepared and all critical details (such as documenting the key processes and resources) had been included although we did note that some recovery plans still required additional contact details to be added;
- A College wide Business Continuity Plan (Incident Management Plan) had been drafted;
- Recovery plan familiarisation sessions had been delivered to recovery plan owners and to management; and
- An implementation action plan had been devised and agreed which set out the remaining actions to be completed and timeframes for achieving this.

The current position is that 16 departmental BRPs are in place, which cover all of the College's activities and locations. The ICT BRP is supported by a number of related plans including a more robust Digital Recovery Plan and a Cyber Security Incident Management Plan. At the outset of the COVID-19 pandemic in February / March 2020 BRP owners were asked to review their plans with reference to the possibility of closure of College buildings, and the continuance of key functions, including student support and delivery of learning and teaching utilising alternative methods and technology. In February 2022 a process started to revise the departmental BRPs to include lessons learned from implementation. This process was ongoing at the time of our audit fieldwork in April 2022 and eight updated BRPs were provided for review. Completed BRPs are reviewed by the Head of Facilities Management who maintains a tracker on the status of the updating.



Objective 1 - Business Continuity / Contingency Plans are in place covering all of the College's activities and locations (continued)

The departmental BRPs outline the steps to be taken to effect recovery in the event of an incident affecting the College's operations and are intended to be used to assist recovery of operations and continuation of key activities. We noted that all BRPs had been prepared using a consistent format, which reflected recognised good practice as published by the Business Continuity Institute. This included:

- A prioritised list of processes / tasks which must be recovered by all departments following a significant event;
- A prioritised list of departmental processes (including the Recovery Time Objective (RTO), e.g. hours, days, weeks, and the minimum recovery levels to continue operations for each process);
- Details of any infrequent process peaks in order to identify any points in the year where a business continuity event is likely to have a more severe impact;
- Details of the resources required to aid recovery of operations – broken down by the location of where these resources are required; where recovery resources would be located; and the level of resources required over the first month and beyond compared to the level of resources needed in a business as usual scenario;
- Details of inter-dependencies with other faculties or support areas and the associated recovery timeframe for each area. This reflects good practice which ensures that departmental BRPs are not considered in isolation;
- Details of each department's IT service recovery capability i.e. list of IT services used and how quickly those services need to be restored to aid departmental recovery;
- Details of critical periods during the year and processes affected – again to identify timings of greatest impact on the College, e.g. enrolment and exam periods;
- Business continuity box contents (e.g. plans, torches, etc);
- Salvage priorities – if the department was able to salvage certain items (e.g. in a fire when the building is to be condemned);
- Key contacts details – including internal and external contacts; and
- Recovery log to record steps and decisions taken during recovery in order to aid post event reviews and future revisions of plans.

The College wide Business Continuity Plan (Incident Management Plan) is subject to regular review and updating, including to reflect COVID-19 protocols and, since November 2021, it has been circulated to an expanded list of Plan holders. The Business Continuity Plan (Incident Management Plan) is a comprehensive document relating to all College locations and to all functions and services provided by the College. The Plan guides preparedness, response and recovery and is activated when an occurrence is likely to impact significantly on College business. The sections of the Plan cover:

- Context – including Business Continuity Strategy and Planning; and the Business Continuity Team;
- Plan – including Planning for an Emergency; Notification of an Incident and Plan Activation; Emergency Response and Control; Training; and Testing and Review;
- Plan Distribution and Document Control; and
- Appendices – including Contact Numbers (internal and external); and Emergency Action Task Lists for a number of scenarios including fire, gas leak, water damage etc.



Objective 1 - Business Continuity / Contingency Plans are in place covering all of the College’s activities and locations (continued)

Observation	Risk	Recommendation	Management Response		
<p>The Resource Recovery section of the departmental BRP asks the recovery plan owner whether an agreement is in place with regard to any of the resources required to aid recovery of operations. An example would be for the provision of specialist space by industry contacts and other educational establishments. We noted from a review of departmental BRPs that there was a mix of Yes / No responses but that in those instances where a No response was provided there were no documented actions for the BRP owner to follow up. Also, where the answer was Yes, there may not be a formal agreement in place, just a historic informal arrangement which may or may not still be valid. In particular, as a result of the COVID-19 pandemic, circumstances are likely to have changed at the external organisation making it less likely they could assist in the event of an incident at the College.</p> <p>Similar findings were highlighted in internal audit report 2019/12 and we noted that the Ashton Resilience update report (issued in August 2019) included an action in the implementation plan for BRP owners to ‘Investigate, formalise and document potential reciprocal arrangements for specialist space options’ – with a rolling completion target of between Q4 2019 and Q3 2020. This action would not appear to have been fully implemented.</p>	<p>The resource recovery strategies set out in the departmental BRPs may not work, albeit there is now more scope for continuing operations remotely.</p>	<p>R1 Investigate, formalise and document potential reciprocal arrangements for specialist space options and other resource recovery strategies that have been identified within the departmental BRPs.</p> <p>More detail on the nature of the arrangement in place and when it was last revised should be included in the BRPs.</p>	<p>Each BRP to include details of formalised arrangements, as appropriate, for specialist space and other resource recovery strategies as identified within the BRP.</p> <p>Detail of the nature of the arrangement in place and when it was last revised to be included in the BRP.</p> <p>All departmental plans to be updated by 30 September 2022.</p> <p>To be actioned by: BRP Owners</p> <p>No later than: 30 September 2022</p> <table border="1" data-bbox="1655 1150 2089 1278"> <tr> <td data-bbox="1655 1150 1872 1278">Grade</td> <td data-bbox="1872 1150 2089 1278">3</td> </tr> </table>	Grade	3
Grade	3				



Business Continuity

Objective 1 - Business Continuity / Contingency Plans are in place covering all of the College's activities and locations (Continued)

Observation	Risk	Recommendation	Management Response		
<p>It was also noted in the Resource Recovery section of the departmental BRPs reviewed as part of our audit that there was generally mention of 'remote working', without much further detail being provided. For example, during the COVID-19 pandemic some practical teaching activities were able to continue remotely. This may be required in future if there is an incident and specialist space is not available e.g. Kitchen space.</p> <p>Following discussion with the College Secretary / Director of Planning it was considered that the design of the BRP template could be amended to specifically include a new section on remote working.</p>	<p>Resource recovery strategies are not sufficiently detailed in the departmental BRPs resulting in delays to recovery time.</p>	<p>R2 Consider amending the departmental BRP template to specifically include a new Resource Recovery section on remote working.</p>	<p>Agreed.</p> <p>Revised template including Resource Recovery section on remote working to be produced and circulated to all BRP owners.</p> <p>Template to be accompanied by guidance note and to be used by Owners when completing R1 above.</p> <p>Revised template to be actioned by: Compliance Auditor</p> <p>No later than: 31 July 2022</p> <p>Revised Resource Recovery sections to be completed by: BRP owners</p> <p>No later than: 30 September 2022</p> <table border="1" data-bbox="1659 1243 2089 1350"> <tr> <td data-bbox="1659 1243 1874 1350">Grade</td> <td data-bbox="1874 1243 2089 1350">3</td> </tr> </table>	Grade	3
Grade	3				



Objective 1 - Business Continuity / Contingency Plans are in place covering all of the College's activities and locations (Continued)

Observation	Risk	Recommendation	Management Response	
<p>For the sample of departmental BRPs reviewed we noted that there was inconsistency in completion of the Recovery Log section (Appendix I). This ranged from no entries at all or one line noting the move to remote working in March 2020, through to a comprehensive timeline of all the key actions undertaken throughout the COVID-19 pandemic.</p>	<p>Key information about the recovery is not being recorded to assist with lessons learned or for insurance or investigations purposes.</p>	<p>R3 Further guidance should be provided to recovery plan owners on the level of detail expected to be recorded in the Recovery Log section (Appendix I).</p>	<p>Agreed.</p> <p>Revised guidance to be supplied on level of detail expected in Recovery Log section.</p> <p>This section of each Plan to be updated, if necessary, when completing revisions in R1 and R2 above.</p> <p>Guidance Note to be actioned by: Compliance Auditor</p> <p>No later than: 31 July 2022</p> <p>Updated Recovery Logs to be actioned by: BCP owners</p> <p>No later than: 30 September 2022</p>	
			<p>Grade</p>	<p>3</p>



Business Continuity

Objective 2 - the Business Continuity Plans / Contingency Plans are workable, properly communicated to members of staff, and have been adequately tested

As previously noted, BRP familiarisation sessions were delivered to recovery plan owners and to management at the time of development. Departmental BRPs are discussed at team meetings where relevant.

A copy of the current version of the College wide Business Continuity Plan (Incident Management Plan) is available on the Planning section of Myconnect (intranet). Hard copies of the Plan are also held at Reception and Control point areas (City and Riverside Campuses) and by members of the Executive Leadership Team / Senior Management Team and the Estates and Facilities Team.

The Ashton Resilience update report (issued in August 2019) included actions around a wider incident management exercise to test both the immediate and longer-term response of senior management within the College to a disruptive event. It was also recommended that there should be regular desktop walkthrough exercises of the BRPs, and a testing plan should be developed. The College wide Business Continuity Plan (Incident Management Plan) also includes the requirement for regular testing by means of a prearranged trial plan activation.

The College Secretary / Director of Planning advised that a scenario test was scheduled for early 2020 but this was overtaken by events related to the COVID-19 pandemic, which required full implementation of the College wide Business Continuity Plan (Incident Management Plan) and departmental BRPs. It is planned that Ashton Resilience will facilitate a scenario test of the ICT recovery plans in 2022.



Business Continuity

Objective 2 - the Business Continuity Plans / Contingency Plans are workable, properly communicated to members of staff, and have been adequately tested (Continued)

Observation	Risk	Recommendation	Management Response	
<p>Although, as highlighted above, there has been 'live' testing of the College wide Business Continuity Plan (Incident Management Plan) and departmental BRPs throughout the COVID-19 pandemic and plans are in place for a scenario test of the IT recovery plan, going forward there should be regular scheduled testing of the plans including desktop walkthrough exercises and these should be included in a testing plan.</p>	<p>Recovery actions contained within the College wide Business Continuity Plan (Incident Management Plan) and departmental BRPs may not be effective.</p>	<p>R4 A documented testing plan should be developed for the College wide Business Continuity Plan (Incident Management Plan) and departmental BRPs.</p>	<p>Agreed.</p> <p>Documented testing plan to be developed.</p> <p>To be actioned by: Compliance Auditor</p> <p>No later than: 31 July 2022</p>	
			<p>Grade</p>	<p>3</p>



Objective 3 - the processes and procedures in place follow recommended good practice

As part of our work in 2018/19, reported in internal audit report 2019/12, an assessment was undertaken with reference to the HM Government's Business Continuity Management (BCM) Toolkit and the Business Continuity Institute. We established that the Ashton Resilience report on the Strategic Review of Business Continuity Management, contained reference to guidance contained in the BCM Toolkit including the key components of the BCM Lifecycle:

- programme management;
- understanding the organisation;
- determining BCM strategies;
- developing and implementing a BCM response;
- exercising, reviewing and maintaining BCM strategies; and
- embedding BCM within the organisation's culture.

We noted that the process followed during the review undertaken by Ashton Resilience, and subsequently reported, included:

- Assessment: through series of structured interviews with senior managers the College's BCM requirements were assessed;
- Analysis: by comparing the current status of each component with good practice benchmarks, gaps that needed to be addressed in order to ensure organisational resilience were identified. Recommendations were then raised to address these gaps;
- Reporting: the Strategic Review of Business Continuity Management report finalised in April 2018 set out the findings of the Analysis stage and recommended actions to improve BCM; and
- Follow-up: the Business continuity Planning report issued in August 2019 reported on how the project delivered each of the requirements set out in the original project plan, provided a summary of the key project deliverables, and provided an implementation action plan to further embed business continuity planning at the College.

We concluded that the format and content of the departmental BRPs developed as part of the BCM project, as described under Objective 1 above, were in line with recognised good practice, including the HM Government's Business Continuity Management Toolkit and guidance issued by the Business Continuity Institute and this remains the case. Recommendations have been made under Objective 1 and 2 above to further enhance the processes and procedures in place.



Objective 4 - the work that was undertaken to allow College operations to continue during the COVID-19 pandemic minimised, as far as possible, the impact on the student experience

At the outset of the COVID-19 pandemic in February / March 2020 the Covid-19 Advisory Group met daily, chaired by the Depute Principal and Chief Operating Officer, and considered a wide range of precautionary and business continuity issues. BRP owners were asked to review their plans with reference to the possibility of closure of College buildings, and the continuance of key functions, including student support and delivery of learning and teaching utilising alternative methods and technology.

The College's planning for COP26 (UN Climate Change Conference) meant that it had already contemplated closing the College for two weeks in order to deliver remotely. A project was also underway to introduce Microsoft Teams from June 2020. These helped in the College's transition to remote working.

The Board and Senior Management Team oversaw the migration to remote working, learning and teaching, and all College operations, following closure of the College buildings on 17 March 2020. The College's ICT Team worked quickly to make this switch technically possible and training for superusers was followed by a switch online the next day. The ICT Team could not log on remotely to other users' machines at first to provide support and this was done via phone calls, but full support was available within a week. The ICT Team initially organised the provision of 2,000 laptops to staff and students from classrooms.

Access to digital equipment was an immediate challenge for students and the College invested heavily in laptops and chrome books so that all students in need had access. This was again coordinated by the ICT Team, with volunteers going into the College to set these up. The equipment was couriered out to the students. From our discussions it was noted that the loan scheme was impacted by national supply issues and communication from the College to students was not good at first on the reason for the delay.

From a College point of view there was an emphasis on student engagement and ensuring that students were able to continue their learning. It is recognised that communication was an issue at first, with students in some areas getting little information and others a lot. The comprehensive report 'Delivering in a Pandemic' prepared by the College in January 2022 included as a key lesson learnt that management should 'reassure and communicate with students and staff regularly even when not much has changed'.

During lockdowns, and where national restrictions significantly curtailed campus provision, teaching was conducted using online conferencing software and making maximum use of the College Virtual Learning Environment. During this period campus provision focussed primarily on practical activities, particularly those that were time critical. There was front loading of theory.

The Faculty of Education and Humanities, which has less of a requirement for practical activities, moved to being fully online, with 90% of its programmes continuing online throughout 2020/21. The Faculty led on the development of new guidance on blended learning which was prepared based on the experiences of the Faculty over the last 18 months and is an attempt to draw together some key learning points and provide some recommendations and guidance for all Faculties to consider and discuss.



Business Continuity

Objective 4 - the work that was undertaken to allow College operations to continue during the COVID-19 pandemic minimised, as far as possible, the impact on the student experience (continued)

The Faculty of Hospitality and Leisure faced significant challenges due to the practical nature of so many of its courses. To offset this, the Faculty invested in online 'live' lessons and the use of video for learning and skills practice. The Dean also highlighted that audio was often found to be better as it was easier for students to listen to the instruction at the same time as undertaking the practical activity e.g. cooking lessons in own kitchen.

It was a significant challenge for teaching staff to move from mainly on campus delivery to online and support was provided by the College Learning and Teaching Academy, which was able to accelerate its work in this area in order to meet the challenges presented by the COVID-19 lockdown.

Alternative assessment arrangements were put in place and a national conversation opened with the Scottish Qualifications Authority (SQA) and the Scottish Government over their assessment strategy for practical based vocational courses.

At the time of the initial College closure on 17 March 2020 student recruitment for entry in August 2020 was at its peak. A substantial number of interviews were still required, and all had to move online or be conducted over the telephone, alongside the continued communication with some 14,000 applicants who had applied to join the College.

From lockdown in March 2020, on-campus counselling also transitioned to a telephone service, which was made easier by staff having already been trained in telephone counselling. Some face-to-face counselling remained available depending on student needs e.g. mental health etc.

Recognising that the usual 'face to face' engagement and affiliation events could not take place for the 8,000 Freshers starting in September 2020, the College moved all induction and transition activities on-line.

The Students' Association also moved its activities, including sports and societies, online following the first lockdown in March 2020. Regular meetings were held with the College Student Engagement Team and communication was maintained with Faculties. Engagement with students was increased including weekly emails 'WhatsOn'. National funding was made available to the Students' Association to fund a post to support mental well-being.

As noted above, a comprehensive report 'Delivering in a Pandemic' has been prepared which reflects on the College's response to the pandemic providing a detailed account of all the action taken and looking into the future. The College has established key lessons that it hopes will mean it is even more prepared for the task ahead.



Business Continuity

Objective 4 - the work that was undertaken to allow College operations to continue during the COVID-19 pandemic minimised, as far as possible, the impact on the student experience (Continued)

Observation	Risk	Recommendation	Management Response		
<p>We discussed with College management and staff interviewed as part of the audit the method by which actions were recorded and allocated to responsible individuals during the COVID-19 pandemic. This was done in a number of ways including through Team and Committee meeting minutes, although it is considered that there would have been benefit in using a consistent system for documentation across College departments.</p> <p>We noted from similar reviews at other colleges that some made use of Microsoft Teams to record discussions and actions in relation to the response to the pandemic. Workstreams were established with key tasks identified for each. Each task was given a priority grading and tasks were assigned to individuals. Additional notes were recorded (often being the risks associated with the task) and the progress status was captured.</p>	<p>Not all actions are appropriately documented making it harder to track progress with completion.</p>	<p>R5 The College should consider making use of Microsoft Teams or Sharepoint (or similar platform) to record discussions and actions in response to the pandemic or any other longer term incident.</p> <p>This would include workstreams with key tasks identified for each, with each task given a priority grading and tasks assigned to individuals. Additional notes can be recorded, and the progress status captured.</p>	<p>Agreed.</p> <p>The College will agree a standard method by which actions are consistently recorded and allocated to individuals.</p> <p>To be actioned by: Operational Effectiveness Manager</p> <p>No later than: 30 September 2022</p>		
			<table border="1"> <tr> <td>Grade</td> <td>3</td> </tr> </table>	Grade	3
Grade	3				



Objective 5 - appropriate preparations were made and robust plans developed to ensure that College campuses could safely reopen when the COVID-19 lockdown was eased, taking into account all Scottish Government and Health and Safety Executive Guidance relevant to education providers

Operations protocols for the College campus sites were developed to minimise risk to staff students and visitors, as part of planning the return to building occupation. This work was undertaken by the Depute Principal and Chief Operating Officer who reviewed and disseminated all relevant guidance received. The protocols were based on the Scottish Government's Coronavirus (COVID-19): guidance for colleges, initially published on 9 July 2020. This guidance came into effect on 29 June 2020 and was updated and renewed as circumstances changed. It was in turn predicated on the principles and phased approach described in Coronavirus (COVID-19): Scotland's route map through and out of the crisis published on 21 May 2020.

The first set of protocols for onsite operations was published by early July 2020. The College made a commitment to updating these in line with Scottish Government guidance and the prevalence of the virus locally. 20 editions and updates have been produced to date. The protocols cover all aspects of operation on site, including:

- Key principles;
- Risk and Equality Impact Assessments;
- Learning & Teaching; Library provision;
- Travelling to College; parking;
- Entering and leaving the buildings: temperature checks, PPE;
- Lateral Flow Testing;
- Culture and behaviour; hot desking; meetings;
- Hygiene & cleaning; ventilation;
- Catering provision; use of kitchens;
- First Aid and Fire Wardens;
- Deliveries and visitors;
- Student Services, IT support; and
- COVID notification and absence procedures.

In addition to making the full protocols available to all staff on the College intranet, a 'Staff on Campus Guide' was also produced, as well as a parallel Student Guide. The arrangements for a safe return to College campuses has been a focus of discussion at the College Executive Leadership Team / Senior Management Team and Health and Safety Committee meetings throughout the pandemic. The Health and Safety Committee is chaired by the Depute Principal and Chief Operating Officer. A system of risk assessments was developed and signed-off by the Health and Safety Committee and Trade Unions before being published and communicated to staff. During the COVID-19 pandemic the College increased the frequency of Health and Safety Committee meetings from three times in each academic year to monthly. The previous meeting frequency will be reinstated from academic year 2022/23 onwards but may be amended in future depending on the prevailing circumstances.



Objective 5 - appropriate preparations were made and robust plans developed to ensure that College campuses could safely reopen when the COVID-19 lockdown was eased, taking into account all Scottish Government and Health and Safety Executive Guidance relevant to education providers (continued)

A communication campaign enforcing key messages was looped on display screens throughout the campuses, and signage was posted wherever appropriate. The Students' Association helped with a campaign to encourage students to take the stairs rather than the lift.

From July / August 2020 Estates teams (with FES) planned and implemented measures to minimise risks associated with the movement of people, cleaning and hygiene, ventilation, airflow / filtration etc. Cleaning staff returned to work in July 2020 on a phased return basis.

Over an 18-month period the College created, maintained and refreshed over 14,000 signs and laid 4 miles of floor tape to encourage social distancing. Establishing a safe route through the College, to adhere and flex to social distancing rules, also meant an entirely new approach to timetabling. Each individual teaching space had to be reviewed to restrict and flex capacity in accordance with changing guidelines. State-of-the-art thermometers were installed at the campus entrances.

In mid-September 2020, as staff and students returned for practical classes on site, the College began to record the numbers of confirmed and suspected cases of COVID-19 amongst its staff and students. One of the main intentions of this reporting was to allow the College to identify any possible clusters of cases at the earliest opportunity.

The College received a proactive visit from the Health and Safety Executive's (HSE) HM Inspector of Health and Safety and a Local Authority Environmental Health Officer on 21 October 2020. Although no formal report was received following the visit, details are recorded in the Health and Safety Monthly Report for October 2020 to the College Senior Management Team. The scope of the visit was to assess how the College was controlling the risks from COVID-19, particularly in relation to practical sessions which involve close contact and therefore the visit concentrated on the Hair and Beauty department. Student movement, access / egress, enhanced cleaning measures were also discussed during the visit. It is noted that initial feedback from the HSE Inspector commended the College's systems and COVID measures as some of the best practice they had observed. The information for visitors and risk assessments provided to the HSE Inspector prior to the visit were also noted as good practice.

In May 2021 lockdown measures were eased in stages in the light of successful vaccination rollout. A commensurate staged return of staff and students to campus operation was undertaken in line with Scottish Government guidelines. The College Principal met with staff teams across the College to explain the extent of campus return expected of students and staff within these limits, with safety as a priority along with the safe delivery of essential campus learning and teaching.

In September 2021 a new Hybrid Working Toolkit was approved by the Board of Management and is in place to guide and support the safe return to campus operations on a hybrid basis.



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