CITY OF GLASGOW COLLEGE

Board of Management
Audit & Assurance Committee

Date of Meeting	**Tuesday 29 November 2022**
Paper No.	**AAC2-J**
Agenda Item	**5.6.5**
Subject of Paper	**Internal Audit Report – Follow Up Reviews**
FOISA Status	**Disclosable**
Primary Contact	**Henderson Loggie**
Date of production	**23 November 2022**
Action	**For Discussion and Decision**

Recommendations

The Committee is asked to consider and discuss the report.

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 Follow Up Report assesses whether recommendations made in previous reports have been appropriately implemented and ensures that, where little or no progress has been made towards implementation, that plans are in place to progress them.

The College has made good progress in implementing the recommendations followed-up as part of this review with 31 (69%) of the 45 recommendations that were past their agreed completion dates being categorised as 'fully implemented'. 14 recommendations (29%) were assessed as 'partially implemented' and one (2%) had been 'little or no progress made'.

3.   **Impact and implications**

Refer to internal audit report.

City of Glasgow College

Follow Up Reviews 2021/22

Internal Audit report No: 2022/11

Draft issued: 22 November 2022

Final issued: 23 November 2022

Contents

<u>Appendices</u>

Management Summary

Introduction and Background

As part of the Internal Audit programme at City of Glasgow College ('the College') for 2021/22, we carried out a follow-up review of the recommendations made in Internal Audit reports issued during 2020/21 and reports from earlier years that had either not already been subject to follow-up or where previous follow-up identified recommendations outstanding. These were:

- Internal Audit Report (2021/03) – Debtors and Income
- Internal Audit Report (2021/04) – Equality & Diversity
- Internal Audit Report (2021/05) – IT Network Arrangements / Security
- Internal Audit Report (2021/06) – Follow-Up Reviews 2020/21
- Internal Audit Report (2021/07) – 2020/21 Student Activity Data (Credits)
- Internal Audit Report (2021/08) – Capital Projects
- Internal Audit Report (2021/09) – Curriculum Planning
- Internal Audit Report (2021/10) – Partnership Working
- Internal Audit Report (2021/11) – Business Engagement
- Internal Audit Report (2022/03) – Business Continuity

Internal Audit Reports 2021/01 – Annual Plan, 2021/02 – General Ledger, 2022/01 ANA and Strategic Plan, and 2022/02 – Annual Plan did not contain any recommendations and as a result no follow up work was carried out for these reports.

Objectives of the Audit

The objective of each of our follow-up reviews is to assess whether recommendations made in previous reports have been appropriately implemented and to ensure that, where little or no progress has been made towards implementation, that plans are in place to progress them.

Audit Approach

For the recommendations made in each of the reports listed above we ascertained by enquiry or sample testing, as appropriate, whether they had been completed or what stage they had reached in terms of completion and whether the due date needed to be revised.

Action plans from the original reports, updated to include a column for progress made to date, are appended to this report.

Overall Conclusion

The College has made good progress in implementing the recommendations followed-up as part of this review with 31 (69%) of the 45 recommendations that were past their agreed completion dates being categorised as 'fully implemented'. 14 recommendations (29%) were assessed as 'partially implemented' and one (2%) had been 'little or no progress made'.

Overall Conclusion (Continued)

The recommendations that were 'partially implemented', together with those not past their agreed completion dates, will be subject to follow-up at a later date.

Our findings from each of the follow-up reviews has been summarised below:

From Original Reports			From Follow-Up Work Performed				
Area	Rec. Priority	Number Agreed	Fully Implemented	Partially Implemented	Little or No Progress Made	Not Past Agreed Completion Date	Considered But Not Implemented
2021/03 – Debtors and Income	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	2	2	-	-	-	-
Total		**2**	**2**	**-**	**-**	**-**	**-**
2021/04 – Equality & Diversity	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	3	2	1	-	-	-
Total		**3**	**2**	**1**	**-**	**-**	**-**
2021/05 – IT Network Arrangements / Security	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	7	4	3	-	-	-
Total		**7**	**4**	**3**	**-**	**-**	**-**
2021/06 – Follow Up Reviews 2020/21	1	-	-	-	-	-	-
	2	4	2	2	-	-	-
	3	16	11	5			
Total		**20**	**13**	**7**			
2021/07 – 2020/21 Student Activity Data (Credits)	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	1	1	-	-	-	-
Total		**1**	**1**	**-**	**-**	**-**	**-**
2021/08 – Capital Projects	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	2	2	-	-	-	-
Total		**2**	**2**	**-**	**-**	**-**	**-**
2021/09 – Curriculum Planning	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	2	2	-	-	-	-
Total		**2**	**2**	**-**	**-**	**-**	**-**
Total Carried Forward		**37**	**26**	**11**	**-**	**-**	**-**

Overall Conclusion (Continued)

From Original Reports		Number Agreed	From Follow-Up Work Performed				Considered But Not Implemented
Area	Rec. Priority		Fully Implem-ented	Partially Implem-ented	Little or No Progress Made	Not Past Agreed Completion Date	
Total Brought Forward		**37**	**26**	**11**	**-**	**-**	**-**
2021/10 – Partnership Working	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	2	1	-	1	-	-
Total		**2**	**1**	**-**	**1**	**-**	**-**
2021/11 – Business Engagement	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	1	1	-	-	-	-
Total		**1**	**1**	**-**	**-**	**-**	**-**
2022/03 – Business Continuity	1	-	-	-	-	-	-
	2	-	-	-	-	-	-
	3	5	3	2	-	-	-
Total		**5**	**3**	**2**	**-**	**-**	**-**
Grand Total		**45**	**31**	**13**	**1**	**-**	**-**

Overall Conclusion (continued)

The grades, as detailed below, denote the level of importance that should have been given to each recommendation within the internal audit reports:

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.

Acknowledgements

We would like to thank all staff for the co-operation and assistance we received during the course of our reviews.

Appendix I - Updated Action Plan
Internal Audit Report 2021/03 – Debtors and Income

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R1 The College should review its current approach for raising debtor invoices and identify whether any elements of the current process could be delegated to other teams in the College to raise invoices directly onto the sales ledger, without the need for a sales invoice request. A pilot exercise could be undertaken to test out this approach and identify the controls required to ensure the continued accuracy of the sales invoice process.	3	We will work with the commercial department to set up a pilot programme for session 2122 ensuring strong financial controls remain place to ensure accuracy of the sales invoicing process.	Head of Finance	30 November 2021	All processes within the Purchase and Sales Ledger function remain under regular review to maintain appropriate balance of robust controls, subject-matter expertise and operational efficiency. Specifically for debtor invoicing the end-to-end workflow and information capture systems and templates have been refreshed to reduce risk of manual error and improved streamlining. Specific benefit shave bene achieved with invoicing of Nautical courses. ***Fully Implemented***
R2 The College should review an update the current guidance in relation to credit notes, outlining the process to be followed and specifically detailing who can authorise the credit notes and providing improved clarity on limitations on the approval limits for credit notes.	3	Agreed – credit notes will be issued in line with the refund policy. The limits for authorisation will mirror the authorisation levels for finance staff within the financial regulations.	Head of Finance	30 September 2021	This has been completed and all authorisations are now sent to the Head of Finance. ***Fully Implemented***

Appendix II - Updated Action Plan
Internal Audit Report 2021/04 – Equality & Diversity

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R1 The published Equality Act 2011 Summary of Duties and Glossary of Terms should be reviewed in line with good version control, i.e. Every 3 years, and the links to the Public Sector Equality Duties should be updated. https://www.equalityhumanrights.com/en/advice-and-guidance/guidance-scottish-public-authorities	3	Agreed. Actions: (a) Equality Act 2011 Summary of Duties is to be revised and published; (b) Public Sector Equality Duties (PSED) links to be updated.	(a) ED&I Manager (b) Communications Team	30 November 2021	a) The Equality Act document has been reviewed and although there are no changes to the information contained within the Act, the language guide and links have been updated. b) The PSED links have been updated The Glossary of Terms review is now completed and was updated to the website in November 2022. ***Fully Implemented***
R2 The version of the Student Bullying and Harassment Policy (May 2014) and Student Disciplinary Policy (2014) published on the College website requires to be updated, as part of the work that is already underway. The College should establish a clear policy relating to Cyber Bullying within the revised Student Bullying and Harassment Policy and where students can get support within the College or other external agencies.	3	Agreed. Actions: (a) The Student Bullying and Harassment Policy (May 2014) and Student Disciplinary Policy (2014) are to be revised as per recommendation. (b) Develop clear policy on Cyber Bullying within the revised Student Bullying and Harassment Policy	Depute Principal and Vice Principal Student Experience	30 November 2021	The Student Bullying and Harassment Policy was updated in September 2021, published November 2021 which incorporated Cyber Bullying. ***Fully Implemented***

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R3 The EQIA section of the College website should be updated to reflect current EQIAs, and the process for monitoring the updating policy and procedures via the Policy and Procedure Tracker by the Compliance Manager (Performance) should include EQIAs. Older EQIAs should be held within an archived folder for reference purposes. All EQIAs should be dated and signed by a Dean or senior faculty management in line with College guidance. EQIAs for the Dignity at Work Policy, Toil Policy, and Home Working Guide should be developed.	3	Agreed. Actions: (a) Update EQIA section of website to ensure that out of date EQIAs are removed and up to date versions are published (b) Review Policy and Procedure Tracker and update process and EQIA sign-off and retention. (c) Review EQIA archive and advise Compliance Manager of missing EQIAs (d) Develop EQIAs for Dignity at Work Policy, Toil Policy, and Home Working Guide	(a) Director of Communications - Communications Team (b) Head of Performance Improvement/ Compliance Manager (c) ED&I Manager (d) Executive Director HR	31 December 2021	The EQIA section of the website has been updated all old EQIA's removed. Only EQIA's that have been approved and signed published on the website. Performance now tracking all EQIA's. A short life working group has been established to oversee the development of an atomisation of the process. This has been completed by Performance an update of all outstanding EQIA's has been circulated on the 31st October 2022. ALL HR policies currently being revised and EQIA will be conducted. ***Partially Implemented*** **Revised Date of Completion:** 31 December 2022

Appendix III - Updated Action Plan
Internal Audit Report 2021/05 – IT Network Arrangements / Security

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R1 To effectively communicate the College's risk management approach to staff and decision makers, so that they understand how cyber security risks should be managed and to help them make decisions about them, updates on the threat landscape, events, actions, and plans surrounding cyber security within the college and the sector should be reported to the Executive and to the Board regularly. Reporting should include a summary of the top-rated risks on the College's cyber risk register and details of mitigations already in place and those further required.	3	Completed Dedicated section to Cyber Security & Risk now included in the Finance & Physical Resources Committee IT Update.	N/A	Completed	This has been completed. There is a now a dedicated section to Cyber Security & Risk included in the Finance & Physical Resources Committee IT update. ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R2 Discussions with FES regarding upgrading and patching of systems operating on the College IT network should consider the following options: • transferring ownership of the buildings access and CCTV systems to the College; • FES developing a programme of upgrading and patching of systems in line with the system vendor requirements and providing confirmation of upgrades and patches to the College IT team; and • removing the building access and CCTV systems from the College IT network and transferring them to a separate dedicated network (optimal solution).	3	The College have made some progress on this issue by obtaining agreement with FES\GLQ to migrate aspects of the building management system at Riverside moving it to a own dedicated segmented area of our network. Further discussions and changes will be required.	Director of IT	30 June 2022	FES have upgraded their system allowing the College to update all plug ins to the latest version. As a result, we were able to retain our Cyber Essentials Plus accreditation. ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R3 Ensure that penetration or security testing is performed on all internally developed systems and applications to ensure that existing vulnerabilities are identified and suitably remediated prior to implementation. Confirmation of similar testing should be obtained from third party developers.	3	IT Team will ensure that all future internally developed systems are penetration tested as part of system testing. Retrospective Testing of the main internally developed Enquirer system will be conducted in 2 phases; internally by the IT Team and then externally by a Technology partner to verify test outcomes. Penetration Testing to be completed by March 2022 Remedial work planned & completed by September 2022.	Director of IT	30 September 2022	The Penetration testing has been completed and the outcome report has been received. Minor points identified for remedial work and the plan for this work will be completed by Janaury 2023. Penetration testing has been completed with the report provided as evidence. Remedial work is now planned due to there being no "Serious" or "High" risks. The remedial work identified is detail in the Penetration test report. *Partially Implemented* **Revised Completion Date:** 31 January 2023

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R4 It is recommended that awareness of the risks arising from the use of removable media is re-enforced to staff and students. This should then be followed up with the introduction of a College-wide requirement for all staff and students to use encrypted USBs only, leading to a restriction in the use of USBs enforced by policy (through whitelisting of devices and port restrictions) and ultimately over time, the full removal of the ability to use such devices.	3	The removal of USB drives has been a Strategic Aim of the IT Team which has now been facilitated by the adoption of Office 365 & Teams \OneDrive over the past 18 months (for both staff & students). Phase 1: engage with Digital Transformation Group to explain USB removal plan (December 2021) and seek support to eliminate USBs or allow only encrypted USBs (IT would support full ban on USBs however could impact Student Learning). Phase 2: explore option to only allow encrypted USBs (February 2022) Phase 3: unencrypted USB storage blocked from College devices (September 2022)	Director of IT	30 September 2022	Phase 1 – the phase 1 plan is to initially block "Support" Staff USB usage in "higher risk" areas such as Finance, GR & Student Records where access to personal information is available. Technical solutions are now in place, awaiting Management "sign off" before planned roll-out date of January 2023. Phase 2 – the plan for phase 2 will be to block USB's for Teaching Staff come summer 2023. Phase 3 – This needs to go back to the Digital Transformation Group for further discuss/agreement due to the initial response received within the College. ***Partially Implemented*** **Revised Completion Date:** 30 June 2023

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R5 Ensure that the use of 2FA is extended to all remaining staff and on all accounts which access College services in order to protect against password guessing and theft. Where appropriate, and to provide flexibility, offer users a choice of factors to self-authenticate, as no single method will suit everyone (or all environments or devices). These may include SMS or email messages, biometrics, or physical tokens.	3	College is keen to extend the roll out of 2FA and is in discussion with the Trade Unions to gain support. This is a standing agenda item for the Local Negotiating Committee (LNC) which IT have already presented to. Since this meeting, the College Data Protection Officer has conducted a Data Privacy Assessment to further re-assure Staff\Trade Unions on the safety of personal data (personal mobile phone number) supplied as part of the 2 FA process to Microsoft.

Currently a number of key Support Departments already use 2FA (IT, Finance, SMT & ELT) and all students now have 2FA for Office 365. | Director of IT | 30 September 2022 | 2 FA was fully rolled out across the College in April 2022.

Fully Implemented |
| **R6**   Full disk encryption should be deployed on all College managed devices to prevent data loss in the event of loss or theft of the devices. Other protections, such as the use of Intune, should be applied to personal devices that are used to access College data and systems. | 3 | As described, the IT Team have commenced testing & initial pilot of Microsoft InTune to provide enhanced Mobile Device Management (MDM), of which device encryption is a key aspect. MDM is now vital to the College due to hybrid working and blended learning.

On completion of the initial pilot, this will be rolled out across all College mobile devices (both staff & students). | Director of IT | 30 September 2022 | Once Microsoft InTune was deployed, it became apparent that a number of pre-requisite projects (particularly OneDrive data sync) had to be completed before Bitlocker could be rolled out. Once Microsoft OneDrive file synce has been completed and no local data loss is ensured, encryption can then be rolled out.

Partially Implemented

Revised Completion Date: 31 January 2023 |

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R7 Upgrades to the current centralised logging solution, or alternative tools such as a SIEM, should be explored which provide improved monitoring of network traffic for unusual or malicious incoming and outgoing activity, or critical system processing activity that could be indicative of an attack or an attempted attack. Alerts generated by the system should be promptly managed by the IT team.	3	The IT Team introduced a basic level of SIEM 12 months ago to address the threat of internal network security. Further discussions have been taken place with potential Technology Partners (including JISC) to upgrade the SIEM capability within the College however due to the size of the College, the costs have been prohibitive. An options paper will be brought to SMT\ELT with full costings to potentially upgrade the current SIEM capability within the College if agreed.	Director of IT	31 March 2022	IBM's QRadar SIEM solution has now been deployed and is operational on the College network. *Fully implemented.*

Appendix IV - Updated Action Plan
Internal Audit Report 2021/06 – Follow Up Reviews 2020/21

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
2018/06 – Infrastructure Contract Management / Help Desk						
R3 An exercise should be conducted to evaluate the type of trend analysis that would be useful for monitoring Estates and ICT reactive requests. This exercise should include evaluation of current formal reporting and the way that key messages arising from trend analysis are translated into action points to deal with the underlying issues. Results of this evaluation should be reported upwards to senior management for their oversight. Given that the contract with GLQ has only been in place for a relatively short period of time the College should seek to develop trend analysis over time.	3	We accept this recommendation, and we will look to add the trend analysis on the College Performance Dashboard.	Head of Technical Support	30 June 2018 **Revised:** 30 April 2022	**October 2019** The IT Director advised that the IT Operational Plan contains a project to progress this recommendation - either through the upgrade or the replacement of the current IT Service Desk software and this will be complemented by a series of mutually agreed IT Service KPIs. **November 2020** This action is now being carried forward within the recently commissioned "Review IT Effectiveness" (conducted by Scott Moncrieff) with an action to have specified, procured and implemented a new Service Desk platform by March 2021 **August 2021** Management discussions have commenced internally with colleagues in various support departments to elicit business requirements for a Support Service Desk (rather than simply IT). This process is underway with several key business requirements documented. Several potential solutions have also been identified who will be invited to demo their systems. Due to change of the College's priority to implement a new VLE (Virtual Learning Environment) for the new academic year 2021/22, this is where the Team focus has been.	The College are currently at the demo stage of the process with the two products/suppliers shortlisted. Demos are scheduled for the week commencing 8 August 2022. Once the evaluation of the demos is complete the next stage is to review and clarify the pricing elements. The aim is to have the award recommendation report completed and approved by the end of August 2022 ready to place an order with the successful provider. ***Partially Implemented*** **Revised Completion Date:** 31 December 2022

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
2018/06 – Infrastructure Contract Management / Help Desk						
R3 **(Continued)**					**August 2021 (Continued)** The plan is to be in a position in December 2021 to move to invite tenders from suppliers and implementation for the next academic year 2022/23 when the reporting needs from the Service Desk will be determined. ***Partially implemented*** **Revised Date:** 31 August 2022	

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2019/02 – Data Protection						
R7 Put in place a robust data protection compliance framework that includes clear responsibilities; recording of compliance checks required; and routine reporting of the results of compliance checks (and any associated issues) to senior management and to the Audit Committee.	**2**	This recommendation is accepted.	DPO	August 2019 **Revised:** 31 July 2022	**October 2019** The DPO has a plan to implement full data governance department by department. However, this is still to be implemented. **November 2020** Management were one third of the way through Article 30 project (at 31 October 2019) and expecting to achieve 80% of full data governance by end of March 2020 (providing R8 is supported by the Board). Once completed this would identify all items necessary for document compliance. **August 2021** Since the date of the last internal audit follow-up review the College has focused on updating the RoPAs, development of the data protection policies and procedures framework and delivery of training to staff. Whilst the DPO is involved in specific elements of compliance monitoring, such as ensuring that Data Subject Access Requests are appropriately managed, the form and frequency of compliance checks to be conducted by departmental leads on areas such as data retention, completion of DPIAs and recording evidence of consent, has still to be fully developed. ***Partially implemented*** **Revised Date:** 31 July 2022	A Health Check programme has been designed to support the ongoing monitoring of compliance with data protection. This programme has been piloted with the Student Association and is now being rolled out across the College. ***Partially Implemented*** **Revised Completion Date:** 31 December 2022

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2019/02 – Data Protection						
R8 Consider solutions to delete personal data or anonymise this information once it goes past the agreed retention date.	**2**	This recommendation is accepted.	DPO with Operational Effectiveness Manager	August 2019 **Revised:** 31 July 2022	**October 2019** Not Yet Past Completion Date **November 2020** One of several technical solutions for archiving historical data needed to be confirmed by SMT, together with robust organisational methods expected to be put in place by mid-February 2020 so each Department's Head of Privacy (person) (HOP) could archive their data prior to final erasure at a later date (to effect compliance). **August 2021** The DPO is currently working with the College departmental leads to review the retention policies in place and to understand where technical solutions can be implemented to allow automatic deletion, archiving or anonymisation of data once the agreed retention date has been reached. ***Partially implemented*** **Revised Date:** 31 July 2022	A retention review and validation of retention periods has been incorporated into the Health Check programme to create efficiency. ***Partially Implemented*** **Revised Completion Date:** 31 December 2022

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2019/04 – Health and Safety						
R3 Develop succinct departmental H&S procedures and ensure that staff are made aware of these.	2	Accepted. On the implementation of the H&S Management System, work areas will develop local procedures to implement corporate H&S arrangements.	Deans/ Directors	March 2020 **Revised:** 30 April 2022	**October 2019** Not Yet Past Completion Date **November 2020** Upon the launch of the new H&S policy in January 2021 alongside the training planned there will be tasks set of all faculty and directorate areas to renew and further develop local procedures to comply with corporate H&S organisational policy and arrangements. **August 2021** Departmental procedures are aligned to their risk assessments and consequently safe systems of work. These are lodged with the H&S team and held in our MyConnect intranet page along with the departmental procedures. When auditing these are used as the tools for the Monthly Themed audits/inspections. More evidence can however be available at a later date, so it is prudent to hold off closing this action. *Partially implemented* **Revised Date:** 30 April 2022	There are now local procedures in place which allow implementation of corporate at a departmental level. Evidence has been providing showing that individual health and safety checklists have been developed and completed for the Hospital Suite, Kitchen Area and Storage Room. Each of these is concluded with an Action Plan featuring the Issue, Action Required, Person Responsible, *Fully Implemented*

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2019/09 – Staff / Organisational Development						
R1 Future development of OD systems should include identifying a workable solution which allows OD to capture data on completion of staff departmental integrations. One potential solution could involve incorporating a confirmation question within the final section of the online integration pack.	3	Agreed.	Head of OD and OD Manager	30 June 2020 **Revised:** 30 April 2022	**November 2020** The entire integration process is under review and will be refreshed commencing January 2021. This will ensure that participation in specific elements for lecturers, managers as well as departmental requirements can be automatically evidenced. **August 2021** The College is in the process of procuring a new learning experience platform (LXP). This will enhance current digital learning content provision and enable automated tracking, monitoring, and recording of participation. A 'blended model' of integration will be incorporated within the platform and automated recording of completions and facilities for escalating non-completions escalated will be included as standard. A project plan detailing the implementation of the new learning experience platform is to be developed and supplied to Internal Audit by the Director of HR/OD. ***Partially implemented*** ***Revised date:*** 30 April 2022	The contract has been accepted and supplier has been confirmed as Cornerstone on demand. The system will be built in 2 phases. Phase 1 is the build of the platform which will be completed by 29 Sept 2022. Phase 2 will be the build of the performance module with a completion date of the start of December 2022. The system will allow tracking and monitoring and recording of participation as well as reporting tools. ***Partially Implemented*** **Revised Completion Date:** 31 December 2022

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2019/09 – Staff / Organisational Development						
R2 A process should be adopted to ensure that all staff complete all post-employment mandatory training, inclusive of integration, no later than 12 weeks from the date of commencing employment. Exception reporting arrangements should be put in place to manage and mitigate risks.	3	Agreed.	Head of OD and OD Manager	30 June 2020 **Revised:** 30 April 2022	**November 2020** The COVID-19 situation has resulted in the College updating its approaches on how it integrates new employees and ensures attendance to mandatory learning elements. This will be addressed concurrently with R1. **August 2021** As with R1, the automated tracking, monitoring, and reporting features of the LXP will automate the management of enrolments, due dates for completions and generate notifications on any qualification renewals. This will augment the periodic monitoring and exception reporting processes, currently in place. This should be brought into the project plan detailing the implementation of the new learning experience platform is to be supplied to Internal Audit by the Director of HR/OD on its documentation. ***Partially implemented*** ***Revised date:*** 30 April 2022	As per R1. Implementation plan attached. "The contract has been accepted and supplier has been confirmed as Cornerstone on demand. The system will be built in 2 phases. Phase 1 is the build of the platform which will be completed by 29 Sept 2022. Phase 2 will be the build of the performance module with a completion date of the start of December 2022. The system will allow tracking and monitoring and recording of participation as well as reporting tools." ***Partially Implemented*** **Revised Completion Date:** 31 December 2022

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2019/09 – Staff / Organisational Development						
R3 Consider issuing a second training evaluation form six months after the training activity has been delivered to assess whether training has had the desired impact on work performance. Feedback should then be reviewed by line managers with further training or action organised accordingly.	3	Agreed	Head of OD and OD Manager	30 June 2020 **Revised:** 30 April 2022	**November 2020** The OD function is currently automating several processes, one of which involves individual and group development requests. Evaluation forms part of this process and will be included in the second phase of this development. **August 2021** As with R1 and R2, evaluations will be built into the system and a 6-month trigger point for evaluating learning experiences will be designed. This and evaluation of training feedback should be brought into the project plan detailing the implementation of the new learning experience platform is to be supplied to Internal Audit by the Director of HR/OD on its documentation. ***Partially implemented*** ***Revised date:*** 30 April 2022	As per R1. Implementation plan attached. "The contract has been accepted and supplier has been confirmed as Cornerstone on demand. The system will be built in 2 phases. Phase 1 is the build of the platform which will be completed by 29 Sept 2022. Phase 2 will be the build of the performance module with a completion date of the start of December 2022. The system will allow tracking and monitoring and recording of participation as well as reporting tools." ***Partially Implemented*** **Revised Completion Date:** 31 December 2022

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/04 – Purchasing and Procurement						
R7 A training programme should be developed to remind all staff involved in raising and authorising POs, and all staff involved in authorising invoices, of the importance of remaining vigilant in checking that there is a robust rationale for all expenditure requests. In addition, written guidance should be provided to staff describing the types of scenarios to be aware of and outlining what they should do if they are unsure whether there is a valid reason for requested expenditure.	3	Agreed Further training and communication will be delivered to budget managers after lockdown to the ensure the required attitude, awareness and compliance from the start of the 2020/21 financial year.	Vice Principal Corporate Services	September 2020 **Revised:** 31 January 2022	**November 2020** Due to continuing restriction direct training has been delayed however an online training module was developed. The PECOS order approval process was amended with procurement reviewing and providing final approval. **August 2021** Due to continuing restriction direct training has been delayed until in person training can be delivered. The PECOS ordering process continues to be monitored and supported. ***Partially implemented*** **Revised Date:** 31 January 2022	Initial online training was completed with all staff who were also provided a support guide. All staff currently using the system have reported no issues in the 3 years since the system was introduced. However, refresher face to face training was offered to all users in May 2022 and a session was run on the 26 May with a further second session scheduled to run after the summer break which currently has 8 approvers listed as attending. This session had to be rescheduled from the 23 June due to the trainer coming down with COVID. ***Fully Implemented***

Follow Up Reviews 2021/22

Follow-Up Reviews: Internal Audit Report 2020/06 - IT Systems Development

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
R1 Consider producing a suite of systems development project documents, as outlined in this report, and develop summary guidance for staff in relation to the College's approach to project management. Guidance should outline: the methodology to be adopted; in what circumstances the methodology should be applied; the governance arrangements and standard documentation which should be prepared (including outline business case; PIDs; system and user specifications; project plans; and post-implementation reviews).	2	The College are planning to develop a College wide Project Management methodology with additional Project Management capability. The IT methodology will be based on 2 formats; "waterfall"\PRINCE 2 for "infrastructure-based" projects and "agile" which was noted has started to be embedded within the Team using JIRA for requirements gathering and timebox\sprints for System development. The key improvement opportunity is to develop a robust "benefits realisation plan" which will be based on metrics agreed as part of the business case and revisited after project delivery. The newly created IT Business Engagement Manager Role will have responsibility for the robust development of business cases, co-ordination of the IT Development pipeline and formalising customer project "sign off" and measurement of project benefits. A new Digital Futures Forum (formally proposed as Digital Steering Group) has now been formed and will major input on College-wide IT\Digital projects and shape project scope (including funding) and benefits to be delivered.	Director of IT	28 February 2021 **Revised:** 31 August 2022	**August 2021** The College has now created and fully resourced a dedicated, cross-functional Project Management Office (PMO) providing Project Management support and management cross-college. One of the initial projects is the new Visual Learning Environment (VLE) implementation. A cross-College Digital Transformation Group is now established, and its Terms of Reference was agreed and is meeting regularly. We evidenced the Terms of Reference for the Digital Transformation Group and minutes that demonstrate the governance arrangements. Planning for the development of the suite of project documentation by the newly created PMO function was underway at reporting. ***Partially implemented*** ***Revised date:*** 31 August 2022 (to allow time for guidance and new ways of working with the PMO to embed)	The PMO are involved in 14 projects since the PMO was established. 1 project has been completed and 2 are near completion. Further evidence and details of the PMO are included within the Leadership Reorganisation Audit 2020 11. ***Fully Implemented***

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/07 - External 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.	**3**	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. 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.	Vice Principal, Corporate Development & Innovation and Associate Director for Brand & Communications	30 November 2020 **Revised:** 30 July 2022	**August 2021** An updated Social Media Policy has been re-written by the Brand & Communications team and was approved by the Legal team. It is available to all staff on the staff intrant, MyConnect. A revised Internal Communications Strategy plan (and supporting Communications Policy) was in the process of being developed currently by the new Director Communications and Associate Director Brand & Communications in line with the College's refreshed Strategic Plan 2021-30. ***Partially implemented*** ***Revised date:*** 30 July 2022	The updated Social Media Policy has been updated and published. As with other policies, this will be subject to review as Social Media use continues to adapt and evolve. An internal communications plan and supporting policy have been created and have been published. These are being continually reviewed ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/07 - External Communications and Marketing						
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	3	A full plan will be established which will set out both the timings and methods of communications to students throughout their studies. Work will also take place with the Student Association 'CitySA' to fully engage in the student experience from application to graduation. 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.	Student Experience Director and Associate Director for Brand & Communications	30 November 2020 **Revised:** 30 July 2022	**August 2021** A revised Internal Communications plan (and supporting Communications Policy) was in the process of being developed currently by the new Director Communications and Associate Director Brand & Communications in line with the College's refreshed Strategic Plan 2021-30. **Partially implemented** **Revised date:** 30 July 2022	A full plan has been set out that looks at the timings and methods of communicating to students throughout their studies. The CitySA also have a dedicated communications role, that engages the student body with activities, events and key information relating to the SA, The College and their studies. **Fully Implemented**

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/08 - Recruitment, Retention and Staff Development						
R1 Review the Recruitment and Selection Policy and associated Procedures to ensure that these are up to date and reflect current working practice	3	Workforce planning is active within the college - tools such as student recruitment and timetabling systems (which shows staff utilisation) are what managers use to plan. What the college want to do is create something more collaborative, and sophisticated to make this more holistic and meaningful, one where there is one system that captures it all. Following feedback from our Deans/Directors - the level of complexity of capturing this on a spreadsheet need reviewed. This is currently being reviewed at ELT to establish if the current direction of travel, utilising existing technology will deliver the intended results	Human Resources Director	31 January 2021 **Revised:** 31 August 2022	**August 2021** The Recruitment and Selection Policy 2014 and associated procedures were subject to internal desktop review by management and are up to date to current practices and will be documented that they have been reviewed by management through version control and republished in due course. However, management noted a full review of the policy is required. For example, there is ambitions to improve the wider recruitment and selection policy to adopt a more holistic, collaborative, and sophisticated approach. Accordingly, the People & Culture strategy and operational plans have been updated with review of Recruitment and Selection being integral to the strategy and plan, i.e. to revise recruitment methods and current systems. Internal audit was able to evidence this review as part of the People & Culture Strategy.	The policy remains reflective of the current practices. ITrent system contract expires April 2023, therefore there will be no movement on this until we decide on a supplier, which will also be dependent on financial investment. The current activity is to source a supplier for psychometric testing, this is underway. This remains part of our workforce plan, however no further activity will be progressed until we understand the direction of travel spring 2023. ***Partially Implemented*** **Revised Date of Completion:** 30 April 2023

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/08 - Recruitment, Retention and Staff Development						
R1 **(Continued)**					Future policy update will incorporate the output of these actions. For example, the policy currently states the candidate will submit an Application Form, however, this may change in future to CV but will depend on the system used - which may involve a tender process and discussion with the College's Trade Union partners. *Partially implemented* *Revised date:* 31 August 2022	

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/09 - Budgetary Control						
R1 The College should develop and introduce a documented standard approach for undertaking the annual budget process to ensure consistency in developing the annual budget for the College.	**3**	Agreed	Vice Principal Corporate Services	31 March 2021 **Revised:** TBC	**August 2021** Management attend monthly meetings and have adopted a reporting schedule. This recommendation is marked partially implemented as we await evidence of arrangements documented in procedure. ***Partially implemented*** ***Revised date:*** TBC	Budget templates have been designed to ensure consistency and are now in use across the college with the first submission on the new templates being completed in April 2022. ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/09 - Budgetary Control						
R3 The College should develop an approach to identify and deliver savings both in terms of reductions in current expenditure and set out the changes in delivery which will be required in order to secure future financial sustainability. This approach should include: • Definition of what constitutes a saving (cash short term i.e. not recruiting a vacancy for a period of time, or long-term recurring saving i.e. savings from collaborative contracts or procurement), or removal of posts; • Setting of annual savings targets; and • A mechanism for quantifying and reporting on progress with the agreed savings targets.	3	Agreed A detailed guide and process for identifying, setting targets and reporting of efficiency savings will be developed.	Vice Principal Corporate Services	30 November 2020 **Revised:** TBC	Management reported that this is an integral part of the monthly budget meetings with ELT & SMT reporting the potential, planned and actual savings identified and discussed. This recommendation is marked partially implemented as we await evidence of arrangements documented in procedure. ***Partially implemented*** ***Revised date:*** TBC	A new budget template has been developed and support guides are in place. ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at November 2022
Follow-Up Reviews: Internal Audit Report 2020/10 - Asset Management						
R1 A formal evaluation is required on a long-term approach for managing assets, ideally based around a complete IT solution to move the process forward to achieve alignment with the business needs and policy aims of the College for managing its assets.	3	Agreed Tight controls are currently in place to manage the College asset register. We recognise the requirement for a specific asset management software to streamline to current process and enable devolved management of the assets.	Vice Principal Corporate Services	31 March 2021 **Revised:** TBC	**August 2021** The College has created a Digital Transformation group to manage the ambitious plans to improve the digital performance. The specific asset management software is delayed as other projects were assessed as more urgent during the pandemic. ***Partially implemented*** ***Revised date:*** 31 March 2022	The college has procured and are currently implementing the specific asset management software. ***Fully Implemented***
R5 The disposal process should be updated to include a physical check of the number of similar items remaining in the specific location against the number of similar assets recorded in that location on the asset register.	3	Agreed. The disposal process will be updated ensuring no assets are removed from the register, only the status will change. The new asset management software will provide a more robust enforcement of disposed assets.	Vice Principal Corporate Services	30 November 2020 **Revised:** 31 March 2022	There has been a delay in procuring a new asset management system however management are now only changing the status or redundant equipment rather than remove the equipment from the asset register. ***Partially implemented*** ***Revised date:*** 31 March 2022	The procedure has been updated to state that all assets must remain on the asset register with the status being changed when disposed. This process has also been incorporated in to the asset management software implementation. ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/11 - Leadership Reorganisation						
R1 The College should introduce a protocol which ensures that in future all completed organisational change programmes (or projects) are formally reviewed to assess whether all of the expected benefits have been realised and to identify (through a lesson learned exercise) how future change programmes could be more effectively delivered. The outcome of this evaluation should be reported to the Committee which approved the original business case.	3	Agreed. Proposals for the creation of a Project Management Office for the College are being actively discussed and developed and should be approved before Christmas 2020. Developing protocols for the management of all our projects will be a key part of its role.	Depute Principal	June 2021 **Revised:** 31 August 2022	**August 2021** The proposal to create a Project Management Office was approved in January 2021. Three staff were duly recruited, and on 10 August 2021 the following posts were taken up: Associate Director, Project Management Project Co-Ordinator Project Officer. The Associate Director reports to the Depute Principal. Creating protocols, processes, and procedures for evaluating and reporting on the success of each project is an early task for the new PMO team. ***Partially implemented*** ***Revised date:*** 31 August 2022 (to allow time for guidance and new ways of working with the PMO to embed)	A PMO Project Handbook has been drafted. It details the Scope and Benefits of the PMO, the relevant training & development. It also describes the various stages of Project Management and what is expected at each of these stages. ***Fully Implemented***

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/11 - Leadership Reorganisation						
R2 The College should develop and implement a proportionate project management methodology for the planning and delivery of transformational projects which meet specific criteria.	3	Agreed. Again, this will be central to the work of the proposed Programme Management Office.	Depute Principal	June 2021 **Revised:** 31 August 2022	**August 2021** The PMO is charged with supporting every project leader in identifying the best project management methodology for their project, and then for monitoring progress so that projects are delivered on time and within budget. ***Partially implemented*** ***Revised date:*** 31 August 2022 (to allow time for guidance and new ways of working with the PMO to embed)	A PMO Project Handbook has been drafted. It details the Scope and Benefits of the PMO, the relevant training & development. It also describes the various stages of Project Management and what is expected at each of these stages. Additionally, a Project Stage Checklist has been developed. This lists different activities/actions that should take place under each of the stages. ***Fully implemented.***

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/11 - Leadership Reorganisation						
R3 As an integral part of the business planning process the College should ensure that sufficient resources are allocated to programmes and projects to ensure that they can be successfully delivered without adversely impacting on current performance levels for the project manager's substantive post.		Agreed. This will follow from the creation of our Project Management Office, as each project will need to follow a methodology that includes rigorous planning. Arrangements for resourcing the project, including backfill for the project manager, will be a central part of this process.	Depute Principal	June 2021 **Revised:** 31 August 2022	**August 2021** The PMO is charged with ensuring that the resourcing of each project has been fully considered and steps taken to confirm that appropriate resources are in place. ***Partially implemented*** ***Revised date:*** 31 August 2022 (to allow time for guidance and new ways of working with the PMO to embed)	The PMO Handbook details the PMO's role in resourcing for projects. It plays a role in training the Project Manager role in the use of internal/external resource use. They also provide ongoing support in this area. Part of the project development process involves the production of a business case which stipulates resources required. In the case of large projects, this must be signed off by ELT before the project begins. ***Fully implemented***

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress Previously Reported	Progress at August 2022
Follow-Up Reviews: Internal Audit Report 2020/11 - Leadership Reorganisation						
R4 The College should take steps to ensure that in future all training is subject to completion of a formal evaluation by all participants and is evaluated to gauge effectiveness. Where identified as ineffective, training provision should be reviewed and improved upon. This approach should be applied to both training delivered internally and also training delivered by external training providers	3	Agreed. 1. Again, this will be stipulated in the documentation and guidelines for all projects introduced by the new Project Management Office. 2. The HR Director, who leads the Organisational Development group, had already agreed to ensure that, with immediate effect, all training is formally evaluated, reviewed, and improved / enhanced.	1. Depute Principal 2. HR Director	1. Depute Principal 2. HR Director	**August 2021** 1. The College's Project Management Handbook will stipulate that appropriate training is delivered, and the Project Manager will check that evaluation of that training has taken place. 2. This action is duplicated by R3 from the 2019/09 Staff/ Organisational Development which will be monitored for completeness. Therefore, it was agreed with the Director of HR/OD that this action be removed. **Partially implemented** **Revised date:** 31 August 2022 (to allow time for guidance and new ways of working with the PMO to embed)	The PMO Handbook details the PMO's role in resourcing for projects. It plays a role in training the Project Manager role in the use of internal/external resource use. They also provide ongoing support in this area. As noted in the previous update, it was agreed with the Director of HR/OD that this action be removed. **Fully Implemented**

Appendix V - Updated Action Plan
Internal Audit Report 2021/07 – 2020/21 Student Activity Data (Credits)

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
Systems and Procedures for Compilation of Returns *Associate Students* **R1** Ensure that nil Credits are claimed for all Associate Students identified on the FES 2.	3	The College procedures will be updated to ensure Credits are not claimed for all Associate Students	Vice Principal Corporate Services	January 2022	No issues noted from testing of Associate Students in 2021/22, nil Credits claimed. *Fully Implemented*

Appendix VI - Updated Action Plan
Internal Audit Report 2021/08 – Capital Projects

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at November 2022
R1 The College's medium to long term capital needs should be assessed and defined in a medium to long term capital programme plan. This should consider the Digital Strategy and Estates Masterplan currently being developed and support proactive investment solutions. A process should be developed to ensure that the longer term capital programme is reviewed annually and on a rolling basis and the impact of changes to investment assessed. The risks associated with future investment requirements of college self-funded equipment or estate should also be assessed and documented in the College Risk Register.	3	Agreed The longer-term capital programme plan will be approved and regularly reviewed by ELT and the Board. Funding the required medium to long term capital need has become a growing risk and will be added to the College Risk Register.	Vice Principal Corporate Services	31 March 2022	The 3 year capital plan was presented and agreed by the Finance & Financial Resources Committee in November 2021. An annual update is on the agenda for the December 2022 meeting. A significant shortfall in capital funding is a continuing risk to the college. ***Fully Implemented***

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at November 2022
R2 The Business Case template should be expanded to capture details, not just on the capital expenditure, but on any wider supply chain risks and associated costs arising from option appraisals. The business case should be reviewed by the PMO and Procurement Service prior to their final submission to ELT and SMT.		Agreed The Business Case template will be updated to include confirmation of formal review by the PMO and Procurement Service.	Vice Principal Corporate Services	31 January 2022	The business case template has been updated. ***Fully Implemented***

Appendix VII - Updated Action Plan
Internal Audit Report 2021/09 – Curriculum Planning

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at November 2022
R1 The Faculty Board should ensure that all resource costings have been completed prior to submission to the Academic Board and support provided to Faculty leads when developing proposal to ensure that the final proposals to Committee are complete.	**3**	Agreed The costing template will be updated to include initial finance review to ensure robust costing is completed.	Vice Principal Student Experience	31 January 2022	The costing template has been updated and the completed templates are reviewed prior to be submitted for approval. ***Fully Implemented***
R2 Management should consider expanding the roles and responsibilities of the Digital Transformation Group to include the review of the physical infrastructure of the estate in line with curriculum needs. This work would allow a platform then to assess the strategic requirements, and feed into any capital investment requirements for both the digital and physical estate infrastructure.		Agreed In the short-term curriculum related estates change requests will be presented to the Digital Transformation Group. SMT will also review the potential requirement for a specific estates group	Vice Principal Corporate Services	31 January 2022	A Learning Spaces Advisory group, a sub-group of the Digital Transformation Group, has been established. A TOR and membership list for the group has been developed. The group has met several times and have already progressing an initial pilot programme. ***Fully Implemented***.

Appendix VIII - Updated Action Plan
Internal Audit Report 2021/10 – Partnership Working

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R1 In the interim of rolling out the CRM, management should consider developing a central register of agreements that are currently in place with industry partners to act as a central repository on partnership working in place across the College, their tenure, and who manages the relationship. A process for ensuring it is kept up to date should also be developed. Such as the register could be held on SharePoint with restricted access and in line with GDPR requirements.	3	Will liaise with Director of IT to establish current progress and to finalise a timeline for the implementation of the CRM system across the Corporate Development Function.	Vice Principal Corporate Development & Innovation	28 February 2022	A functional specification to be developed by the end of August 2022, following which funding needs to be secured, before working through procurement. Aim to have end user testing underway early 2023 with roll out later part of AY 22/23. *Little or No progress* **Revised Completion Date:** 30 June 2023
R2 The new Partnership Working Agreement process being developed by the Director of Business Partnerships to review and approve partnership working will support the decision making around agreement types by faculty staff. However, Faculty management meetings should be attended by their dedicated BDO to support the formation of partnership working and support in communicating lessons learned around good practice.	3	Actions: 1. Partnership model to be reviewed by Process and Procedural Review Group for approval. 2. Liaise with Deans to ensure participation of BDOs in Faculty Management Meetings.	Vice Principal Corporate Development & Innovation	1. Presented to PPR at its next meeting on 3 March 2022. 2. 31 December 2021	The partnership model has been reviewed and approved by the PPR Group. A procedural review with Faculty & Directorate Representatives is under way. The BDO's are now participating in Monthly Faculty team meetings. *Fully Implemented*

Appendix IX - Updated Action Plan
Internal Audit Report 2021/11 – Business Engagement

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
R1 Management should develop an operational risk register for the Development Strategy that identifies the individual risks to the Strategy being achieved. Mitigating controls, owners, and mitigating action plans. This should be linked to the Operational Plan and key performance indicators. A process for frequent review at the BD Team All-Managers Meeting should be established and, where necessary, reviewed by the Faculties and Development Committee. As an operational risk register, it should feed into the College's wider risk management process, where risks above risk appetite are escalated in line with the operational risk management framework.	3	We will develop an operational risk register aligned to the Key Objectives of the Corporate Development Strategy and aligning to the Operational Plan and KPIs for relevant areas. A Monthly Manager Meeting will be established in calendar and a Risk Register will be included as a standing item.	Vice Principal Corporate Development and Innovation	31 January 2022	The Operational risk register is now aligned to the key objectives for the Corporate Development Strategy and this can be trailed through to the Operational Plans. The team are meeting monthly where Risk is a standing agenda item to be discussed and RAG rated. *Fully Implemented*

Appendix X - Updated Action Plan
Internal Audit Report 2022/03 – Business Continuity

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
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. More detail on the nature of the arrangement in place and when it was last revised should be included in the BRPs.	3	Each BRP to include details of formalised arrangements, as appropriate, for specialist space and other resource recovery strategies as identified within the BRP. Detail of the nature of the arrangement in place and when it was last revised to be included in the BRP. All departmental plans to be updated by 30 September 2022.	BRP Owners	30 September 2022	All owners were asked to submit their revised plans by 30 September. Some missed that deadline, with six have still to be submitted, but these are being actively worked on and should all completed by the end of the year. ***Partially Implemented*** ***Revised completion date:*** 31 December 2022
R2 Consider amending the departmental BRP template to specifically include a new Resource Recovery section on remote working.	3	Agreed. Revised template including Resource Recovery section on remote working to be produced and circulated to all BRP owners. Template to be accompanied by guidance note and to be used by Owners when completing **R1** above.	**Revised template:** Compliance Auditor **Revised Resource Recovery:** BRP owners	**Revised template:** 31 July 2022 **Revised Resource Recovery:** 30 September 2022	Revised template has been completed and went to SMT for approval in August 2022. ***Fully Implemented***

Follow Up Reviews 2021/22

Original Recommendation	Priority	Management Response	To Be Actioned By	No Later Than	Progress at August 2022
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).	3	Agreed. Revised guidance to be supplied on level of detail expected in Recovery Log section. This section of each Plan to be updated, if necessary, when completing revisions in **R1** and **R2** above.	**Guidance Note:** Compliance Auditor **Updated Recovery Logs:** BRP owners	**Guidance Note:** 31 July 2022 **Updated Recovery Logs:** 30 September 2022	Guidance was incorporated into the revised template that went to SMT for approval in August 2022. ***Fully Implemented***
R4 A documented testing plan should be developed for the College wide Business Continuity Plan (Incident Management Plan) and departmental BRPs.	3	Agreed. Documented testing plan to be developed.	Compliance Auditor	31 July 2022	A testing plan has been created and will be used to record all testing which takes place. This will also act as a version control for the annual review of each BRP and the BCP. ***Fully Implemented***
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. 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.	3	Agreed. The College will agree a standard method by which actions are consistently recorded and allocated to individuals.	Operational Effectiveness Manager	30 September 2022	This has not yet been completed, but the Operational Effectiveness & Market Research Manager is working on it and expects it to be completed by the end of the year. ***Partially Implemented*** ***Revised Completion Date:*** 31 December 2022

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