CITY OF GLASGOW COLLEGE

Board of Management
Audit Committee

Date of Meeting	**Wednesday 14 November 2018**
Paper No.	**AC2-D**
Agenda Item	**7**
Subject of Paper	**Strategic Risk Review**
FOISA Status	**Disclosable**
Primary Contact	**Paul Clark, College Secretary/Planning**
Date of production	**7 November 2018**
Action	**For Discussion and Decision**

1. Recommendations

1.1 To consider the review of high-scoring (Amber and Red) risks, changes to risk scores, and to review risks under the Committee's remit.

1.2 To approve associated Risk Management Action Plans (MAPs) noting the updated commentaries and proposed changes to Risk scores as highlighted.

1.3 To review and approve the updated Risk Register

2. Purpose of report

2.1 The purpose of this report is to provide the Board, through the Audit Committee, with an update on the Senior Management review of strategic organisational risks, via the Risk Management Actions Plans (MAPs) for high-scoring risks, and any risks with proposed risk score alterations or other recent changes. Also included is the Risk Register, each highlighting any recent alterations to risk scores.

3. Context

3.1 Risk Management is a key component of the College's internal control and governance arrangements, and as such is an important responsibility of the Senior Management Team, Audit Committee, and the Board of Management. This responsibility is highlighted in the College Strategic Plan at Priority 6. "To be efficient, effective, innovating, and vigilant".

3.2 The current strategic risks have been identified by SMT and the Audit Committee, as the primary strategic risks currently faced by the College. The risks are aligned within the same framework of strategic themes as the College Strategic Plan. The risks included in the Risk Register have potential impacts on one or more of the College's strategic priorities.

3.3 Strategic risks have been reviewed in the current review cycle to November 2018, involving senior Risk "owners.

3.4 The risks which have been identified as the highest scoring risks (i.e. high likelihood, high impact – RAG rated as "Red" and "Amber") are also presented with updated mitigations and commentary within the relevant Risk Management Action Plans (MAPs).

3.5   Recent Changes:
The most recent changes to risk scores were approved by the Board in June 2018, following Committee recommendations. These were:

- The Finance and PR Committee in May 2018 agreed that Risk 15: Failure to achieve operating surplus via control of costs and achievement of income targets be scored lower – from 20 RED to 3x3 = 9 AMBER. This was due to the improved underlying operating surplus projection for 2017-18 and also budgeting for an improved surplus for 2018-19
- Risk 16: Failure to maximise income via diversification - scored higher from 9 to 4x3 = 12 (Risk Owner) AMBER. This is due to the actual income delivered.
- Risk 23 Failure to agree a sustainable model and level of grant funding within Glasgow Region - scored lower from 15 RED to 12 AMBER.

- The Student Staff and Equalities Committee has requested that consideration be given to the inclusion of mental health/well-being within the Risk Register[1].

No further changes to risk score are proposed at this time.

3.6 A revised Risk Register is included in the appendices.

4. Impact and implications

4.1 The effective management and control of risks is essential to the on-going stability and future growth of the College, with clear implications in terms of potential impact upon College students and staff, as well as the College's wider reputation. All strategic risks have potential strategic impact upon the College. The College Risk Register includes matters relating to legal compliance.

4.2 Several strategic risks are financial in nature, and potentially constitute a threat to the College's stated strategic priority to "Maintain our long-term financial stability".

4.3 Risk 16 (above) specifically addresses the new key strategic aim of the College to: "Secure diversity of income and sustainable development".

4.4 Performance management and improving performance are identified as areas of strategic risk, due to the potential impact on reputation, the student experience, and funding.

4.5 Regional and sectoral considerations are included in the process of risk management, and are reflected in the risk documentation.

Appendices:

Appendix 1: Highlighted Risk MAPs

Appendix 2: Risk Register

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[1] Definitions: "Mental Health Problem – refers to any condition, temporary or otherwise, which may affect a person's mental well-being". (Scottish Parliament Information Centre, SPICe, briefing); Mental health problem – any diagnosable illness which "significantly interferes with an individual's cognitive, emotional or social abilities" (NHS Scotland). Ref: https://www.nhsinform.scot/illnesses-and-conditions/mental-health

Risk Management Action Plan

Risk Description: Failure to support student success

Risk ID: 1

Owned by: VPSE   **Review Date: October 2018**

Update

Full Description:

Risk that -
Students leave the College without completing course. Students fail to achieve qualification. Students have a poor experience at the College. College suffers negative financial impact, reputational damage, and potential negative impact upon student recruitment.

Treatment:
Performance Reviews; Self-evaluation/Quality cycle; Curriculum Planning (incl. focus upon PIs); Student Experience Strategy.

Commentary (Update):

Education Scotland Review completed January 2016. Overall a highly positive response reflects the upward trend in student attainment.

Student Experience Strategy has been developed and a number of initiatives have been taken forward as part of it implementation. City Learning 4.0 is one of these initiatives and will be embedded in all Operational Plans at Curriculum Head and Faculty level.

Curriculum planning processes have been further refined to include criteria for course discontinuation to ensure courses meet student/industry demand, reflect College and regional curriculum strategic priorities, and financial viability.

Student success from 2016/17 to 2017/18 indicates a slight decline in PIs. It is anticipated that this decline in some of our PIs will be mirrored by the Scottish college sector. The table below identifies the College's 6 year trend: -

Level	Mode	Completed Successfully						Change	Change
		12-13	13-14	14-15	15-16	16-17	17-18*	16-17 to 17-18	12-13 to 16-17
FT	FE	60%	70%	72%	72%	69%	68%	-1%	+8%
FT	HE	70%	74%	76%	76%	74%	74%	0%	+4%
PT	FE	68%	75%	77%	87%	88%	87%	-1%	+19%
PT	HE	76%	84%	83%	81%	83%	82%	-1%	+6%

Ref: SFC Audited figures

Each College Faculty has developed an action plan in 2017/18 to address low PI courses and the plans are being monitored against performance targets through the Performance Action Group (PAG). Faculty action plans are under review at the Student Experience Leadership Group to monitor Faculty improvement plans.

Action has been identified as part of the PAG Group to target partial success (live students that currently have failed units which prevent them gaining their qualification). Faculties have identified resources required to mitigate partial success. A number of actions have been identified by the PAG group through scrutiny of low PI courses which will lead to performance improvement.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10/25 RAG Rating: AMBER Target Score: 5	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	Risk Tolerance (Able to accept):
Low Medium High	Category: Student Experience Low **Medium** High 1 2 **3** 4 5 6

Impact					
5	10	15	20	25	
4	8	12	16	20	
3	6	9	12	15	
2	4	6	8	10	
1	2	3	4	5	
x	Likelihood				

Risk Management Action Plan

Risk Description: Failure to achieve good student outcome/progression

Risk ID: 3

Owned by: VPSE   **Review Date: August 2018**

Update

Full Description:

Failure of curriculum to be industry relevant. Ineffective links with industry. Ineffective HEI articulation arrangements.

Treatment:
Course Improvement and Action Meetings (CIAMs) well established. All Schools are developing links with industry to ensure industry relevant curriculum. Ongoing collaboration with HEIs to maintain and develop articulation links.

Student Experience Strategy emphasises need for employability, industry relevant curriculum, and industry links (Industry Academies)

Commentary (Update):

The College has participated in the pilot to develop an ongoing College Learner Destination Survey led by SFC.

Data is collected from students to determine satisfaction with suitability of course with regard to preparation for work (First Impressions Questionnaire), and Exit student questionnaire.

A revised Curriculum Review and Planning process is now in place to monitor student outcomes and progression with adjustments made to portfolio as an output of this review.

A student partnership agreement has been established for August 2017 supported by a feedback initiative called "My Voice" and monitored through a Student Partnership Forum.

The New Quality Arrangements 'How Good is our College' were rolled out across the sector in December 2016.   The College Associate Assessors and Performance and Improvement Director have been working with our assigned Education Scotland during 2016/17 to incorporate best practice.   As part of this work an implementation plan for the quality arrangements was devised and put in place.

During the 2016/17 session staff development for teaching and support has taken place on the model, performance indicators and on evaluative writing. A model for Shared Teaching Practice has been developed. A regional quality group was formed which has sought to share practice and develop a common approach to the implementation of arrangements. An evaluative report of 2016/17 and an enhancement plan for 2017/18

has been produced and will form the focus of targeted action for 2017/18.

Excellent links with Universities have been established through the additional funded places scheme and COGC have one of the highest percentages of students articulating to university with advanced standing in comparison with the sector. The college is represented on the Commission on Widening Access (COWA) group and is a key partner in setting up the National Articulation Forum (a recommendation from COWA).

The Audit Committee (May 24 2017) agreed an increase to Likelihood score from 1 to 2, resulting in a total risk score of 10 (AMBER)

The College implemented its enhancement plan in 2017/18 as part of the HGIOC arrangements. A focus of the plan is to ensure good student outcomes and progression to further study or employment.

n.b. it is noted (April 2018) that the College only generates employer information for 766 Part-time students, and gathers destinations on Full-time students in line with SFC requirements.

Final student success information will be available in October 2018 and student progression information will be available from the College Leaver Destinations in November 2018. This risk plan will be updated to reflect actions in response to these datasets.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10/25 RAG Rating: AMBER **Target Score: 10**	Likelihood 4/5 Impact 5/5 Risk Score 20/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Student Experience Low **Medium** High 1 2 **3** 4 5 6

	5	10	15	20	25
	4	8	12	16	20
Impact	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
X	Likelihood				

Risk Management Action Plan

Risk Description: Failure to realise planned benefits of Regionalisation

Risk ID: 4

Owned by: Pr/DPr   **Review Date: September 2018**

Update

Full Description:

1. Failure to secure a positive position for COGC in the context of the Regionalisation Agenda

2. Failure to manage changes to governance arrangements arising from Regionalisation in the best interests of the College and its stakeholders

Treatment:

Maintain effective dialogue with Regional Board, Glasgow Colleges, SFC, and Scottish Government. College senior staff involvement in regional strategic groups.

Commentary (Update):

Dialogue is being maintained with GCRB and with the Glasgow Colleges.

The Glasgow Colleges' Strategic Partnership (GCSP) produced a curriculum and estates strategy – A Vision for College Learning in Glasgow 2015-2020. An estates strategy has now been implemented.

The College is currently hosting the GCRB team at the new City Campus.

Overview of Glasgow College Operational Groups

Three college-led groups provide a forum for regional oversight of operational planning and monitoring. These are:
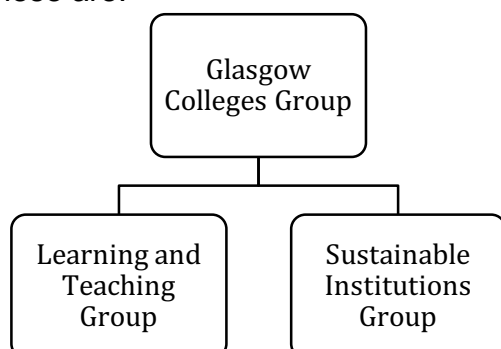
The groups generally meet at 6-week intervals. However, due to the volume of regional collaboration required to effectively plan and monitor activity, the two sub-groups are currently meeting every three weeks.

Chairs for the groups rotate annually, with the chairs for 2017/18 being:
- Glasgow Colleges Group – Alan Sherry, Principal and Chief Executive Glasgow Kelvin College
- Learning and Teaching Group – Joanna McGillivray, Vice Principal Student Experience City of Glasgow College
- Sustainable Institutions Group - Janet Thomson, Vice Principal Resources, Glasgow Clyde College

The Chairs of the Learning and Teaching Group and the Sustainable Institutions Group attend meetings of GCRB's Performance and Resources Committee.
In addition to the above groups, seven regional 'curriculum hubs' exist, formed of senior faculty managers from across the three assigned colleges. The hub areas are based on broad economic sectors and are:
- Administration, Financial and Business Services
- Creative and Cultural Industries
- Energy, Engineering, Construction and Manufacturing Land-Based Industries
- Food, Drink, Tourism, Hospitality and Leisure
- Health, Care and Education, Life and Chemical Sciences
- ESOL, Community and Supported Programmes

These curriculum hubs are intended to support sharing of information within curricular areas and the development of a coherent regional curriculum, alongside providing a central point of contact for employers and other stakeholders related to areas of economic activity. Curriculum Hub activity is overseen by the regional Curriculum and Quality Lead (Chair of the Learning and Teaching Group)

Regional College Group Membership & Responsibilities

Glasgow Colleges Group

Membership:

- o College Principals
- o Chairs of regional Learning and Teaching and Sustainable Institutions sub-groups
- o GCRB Executive Director

Areas of functional responsibility:

- discussion of local, regional and national issues related to the strategic and operational leadership of college delivery;
- coordinating the work of operational regional groups, including the development, delivery and monitoring of Regional Outcome Agreements;
- reporting of relevant information related to the regional and national delivery and policy context to the Glasgow Regional Board, its committees and college

stakeholders; and

- liaison with local, regional and national stakeholders.

Learning and Teaching Group

Membership:

- College Senior Managers with responsibility for curriculum delivery
- GCRB Executive Director

Areas of functional responsibility:

- joint planning of portfolio across the region, supporting the development of a strategic, regional approach to portfolio review based on local, regional and national needs;
- developing, delivering and monitoring Regional Outcome Agreements and reporting progress to the Glasgow Colleges Group and the Glasgow Colleges' Regional Board;
- enhancing engagement with employers and employment support agencies;
- promoting and enhancing effective and innovative learning, teaching and assessment;
- monitoring and evaluating the quality of college delivery across the region and developing approaches to quality enhancement;
- liaising with a range of, regional and national stakeholders, including education partners, universities and local authority education services to further develop strategic approaches to partnership working; and
- facilitating effective learner pathways and progression into work and further study.

Sustainable Institutions Group

Membership:

- College Senior Managers with responsibility for finance and human resources
- GCRB Executive Director

Areas of functional responsibility:

- monitoring a range of financial performance indicators and supporting the development of a strategic, regional approach to ensuring the financial sustainability of the region's colleges, and reporting this to the Glasgow Colleges Group and the Glasgow Colleges' Regional Board;
- ensuring funds are used as economically, efficiently and effectively as possible;
- building regional capacity to assess and develop funding opportunities related to non-SFC income;
- reviewing college and regional risk management;
- supporting the delivery of an improved and fit for purpose regional estate;
- monitoring energy consumption and carbon emission measures, and coordinating actions to improve the environmental sustainability of Glasgow's colleges; and
- providing a forum for sharing human resource information and supporting the

development of regional approaches to workforce development.

GCRB have launched the Glasgow Regional Strategic Plan identifying the joint aims and benefits of the region.

The College continues to participate fully in developing and setting the targets within the annual Regional Outcome Agreement (ROA) which is published alongside the College's Strategic Plan on the College website.

The Board notes that funding for the region and GCRB continue to be a challenge for the Colleges.

On September 4th 2018, the three assigned College Boards and the Regional Board met at City Campus for a development event to promote diversity and equality on boards. This was supported by external organisations, college executives, and ED&I specialist staff. This collaboration was well-received on the day, and outputs are pending.

Current Risk Score:	**Gross Risk Score (assuming no treatment)**
Likelihood 3/5 Impact 3/5 Risk Score 9/25 RAG Rating: AMBER **Target Score: 3**	Likelihood 5/5 Impact 4/5 Risk Score 20/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Change and Development (4) Low **Medium** High 1 2 3 **4** 5 6

x	Likelihood				
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5

Impact

Risk Management Action Plan

Risk Description: **Negative impact upon College reputation**

Risk ID: 6

Owned by: VPCDI   **Review Date: Oct 2018**

Update

Full Description:

1. Failure to protect and maintain the brand.
2. Complaint to Scottish Public Services Ombudsman upheld

Treatment:
1. Now that the City Campus is operational the Communications team is reviewing the mechanisms and best practice for internal and external communication. The CDD is also reviewing the structure of the team to ensure that is more relevant and fit for purpose to maintain the brand.
2. College Complaints Procedure to be available and communicated to all employees; train staff, including managers in operation of college policies & procedures, including legal requirements

Commentary (Update):

1. New Complaints procedure agreed and implemented in line with developments in SPSO framework for FE.
2. The College Complaints Report is now published via the College Website, in line with SPSO requirements.
3. Further staff training now in place to support implementation of SPSO model complaints handling procedure.
4. Through the Meltwater News platform the College continues to monitor its coverage, reputation and positioning within the marketplace on a daily basis
5. Ongoing press enquiries relating to a wide range of areas are commonplace, including some relating to College operations at the City Campus. The College is also experiencing a high volume of FOISA requests at present, covering a wide range of areas from staff salaries and performance related payments, campus events, overseas expenditure, student support, budgets, industrial action information, communications with politicians, etc.
6. Positive press coverage relating to a number of awards, events, and the official royal opening have featured in the press and other media in recent months.
7. College Annual Report 2016-17 published, highlighting various College successes.

N.B. Further commentary to be provided at Development Committee meeting 18/4/18.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10/25 RAG Rating: AMBER **Target Score: 5**	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Reputation **Low** Medium High **1 2** 3 4 5 6

Impact					
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5
x	Likelihood				

Risk Management Action Plan

Risk Description:
Failure to achieve improved business development performance with stakeholders

Risk ID: 7

Owned by: VPCDI   **Review Date: Oct 2018**

Update

Full Description:

Loss of/Failure to build effective partnerships/Reputational Risks/Staff Health and Well Being (see Level 2 Risks below).

Treatment:

Relationships are managed as detailed in the Corporate Development Plan and in line with the agreed Business Development Process Map to ensure good communications, and that any issues are dealt with timeously. The Plan has been reviewed with reference to the College Strategic Plan 2017-25 and the 8 strategic priorities. In line with Strategic Priority 8 the additional strategic planning documents are now required for:

- International/Global reach
- Commercial & Business Development
- Sponsorship
- Employer Engagement
- Corporate Communications

N.B. Associated Level 1 Risks:
- Growth and Development/College Reputation (Risk 6)
- Statutory Compliance Failure (Risk 10)
- Finance/Income Targets (Risk 15)
- Income diversification (Risk 16)

Commentary (Update):

The documents indicated above will come to the Board as part of the new Corporate Development Strategy, relating to delivery of the new College Strategic Plan 2017-25. This strategy is under further development to feature associated initiatives.

The Corporate Development team continue to work with the Faculties in procuring new business as well as sourcing sustainable and reputable opportunities for additional non-government income.

Business Development forecasts for 2018-19 are positive and on target.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10/25 RAG Rating: AMBER **Target Score: 5**	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Change and Development Activities Low **Medium** High 1 2 3 **4** 5 6

	5	10	15	20	25
	4	8	12	16	20
Impact	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
x	Likelihood				

Risk Management Action Plan

Risk Description: Failure to achieve improved performance

Risk ID: 8

Owned by: VPSE/DirP   **Review Date: August 2018**

Update

Full Description and Treatment:

1. Ensure identification, dissemination, monitoring and review of quality improvement KPIs for all areas of service delivery.

2. Work with VPs, Directors and Heads to target areas of under performance.

Commentary (Update):

Curriculum Planning has been used to ensure that Faculty Directors set SMART targets as part of the Curriculum Planning process. In addition Faculties have developed plans following the Curriculum Planning process with a view to significantly improving performance.

Service Area reviews commenced in May 2017 with which has led to a review of service targets and performance. This process is linked to operational planning and to the development of the Colleges strategies.

Impact score raised from 2 to 3 – in consideration of the implication of Regional Outcome Agreement potentially aligning funding to KPIs. Gross risk score increased from 6 to 9 (May 2015).

September 2016: Risk Score moved to 5x5 matrix. Student success performance indicators for 2015-16 to be confirmed.

January 2017: Performance has been retained at its current level. Action plans from Performance Review being put in place and a series of SLWG have been initiated to look at cross college activity impacting on faculty performance. A new curriculum review process has been implemented for 17/18 as a replacement for Performance Review in order to improve curriculum planning so it is linked more coherently to performance of individual programmes.

The EIS dispute in session 2016-17 included several days of strike action in the weeks prior to the summer break. College SMT arranged to support students in completing their qualifications.

Faculties with identified course which are under-performance are targeted to become part of the Performance Action Group (PAG). This group ensures that detailed

action plans have been put in place to intervene to improve performance. Faculty action plans are kept under review at the Student Experience Leadership Group.

The PAG group has scrutinised low performing courses and a number of recommendations have been made in relation to how curriculum teams are tackling low performance.

The Audit Committee (May 24 2017) agreed an increase to Likelihood score from 1 to 2, resulting in a total risk score of 10 (AMBER)

Final student success information will be available in October 2018 and this risk plan will be updated.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10/25 RAG Rating: AMBER **Target Score: 5**	Likelihood 4/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**

Risk Appetite (Willing to accept):	Risk Tolerance (Able to accept):
Low Medium High	Category: Student Experience/ Reputation **Low** Medium High 1 **2** 3 4 5 6

	5	10	15	20	25
	4	8	12	16	20
Impact	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
x	Likelihood				

Risk Management Action Plan

Risk Description: Negative impact of statutory compliance failure

Risk ID: 10

Owned by: CSP/DCS   **Review Date: August 2018**

Update

Full Description:

Where some of the risks listed represent the ultimate sanction possible e.g. conviction, all action short of that and from the point of allegation is a risk to the organisation.

Detailed risks:

1. Breach of Equalities legislation upheld by Tribunal (e.g. successful discrimination claim)
2. Equal pay challenge
3. Unfair dismissal claims (including whistleblowing)
4. FOISA - appeal to Scottish Information Commissioner upheld
5. Serious breach of the Data Protection Act 1998
6. Employment Tribunal appeal upheld
7. Safeguarding /PVG failure
8. Contravention of Bribery Act 2010
9. Conviction for breach of the Corporate Manslaughter and Corporate Homicide Act 2007
10. Conviction for Breach of H & S legislation
11. Breach of procurement legislation upheld
12. Failure of compliance with Equality Act 2010: Specific Duties
13. Loss of UKVI Highly Trusted Status
14. Failure to comply with Counter Terrorist and Security Act 2005 and "Prevent" legislative requirements
15. Failure to comply with the Children and Young People (Scotland) Act 2014 (Corporate Parenting)
16. Failure to comply with EU directive on Protection of Personal Data (applies from May 2018) NB A new Risk Management Action Plan Risk MAP 24) has been created for this issue.

Treatment:
1. Train staff, including managers in operation of college policies & procedures, including legal requirements; Incorporate in all Balanced Scorecards re: responsibility for D&E
2. The harmonisation of teaching pay scales is part of the national bargaining discussions. In terms of support staff the implementation of a job evaluation scheme has been concluded. See Risk MAP 14. Gender Pay Gap is reported and is the subject of a CoGC based research project planned for Jan-Dec 2018, involving staff focus groups.
3. Seek advice from College Secretary, HR Director, and Director of Corporate Support (who has the authority to access external legal specialist support), where appropriate, on key policy/procedural matters, and where risk profile is assessed as high or increasing due to possible or likely non-compliance. Whistleblowing Policy and Procedure developed, approved, and published (2017 ;

4. As above
5. Robust policies in place; Training of staff – e-learning module rolled out Feb 2013
6. Train managers in operation of college policies & procedures; Recruitment of suitably skilled HR staff to advise and guide managers in legal matters
7. Have appropriate policies in place for both students and staff; train managers in operation of college employee policies & procedures. Mandatory staff training; module on My City.
8. Robust policies; Training for staff
9. Train staff, including managers in operation of College Health & Safety policies & procedures, including legal requirements; ensure all facilities/equipment well maintained and regularly tested; Ensure robust regular internal audit.
10. Train managers in operation of college employee policies & procedures, including legal requirements;
11. Seek procurement advice from Procurement Team and, where appropriate, legal advice from the Director of Corporate Support (,, (who has the authority to access external legal specialist support), where appropriate, on key policy/procedural legal matters and where risk profile is assessed as high or increasing due to possible or likely non-compliance
12. All College Polices and Procedures require an Equality Impact Assessment (EQIA); Policy and Procedure EQIAs currently are collated by E,D&I team.
13. Close working relationship with UKVI maintained to reduce risk of loss of Highly Trusted Status.
14. Development and rollout of "Prevent" compliance training; Development of College Prevent Policy.
15. Board of Management corporate parenting training undertaken February 2017; SMT training in April 2017. Development of Corporate Parenting Action Plan.
16. New sub-risk added March 2017, following advice from External Auditor. Now elevated to a stand alone strategic risk (Audit Committee September 2017) with risk treatment involving external consultation with JISC to validate and augment internal findings and recommendations. SMT has agreed the formation of a Data Management WG to progress a series of recommendations relating to GDPR compliance. GDPR training has been rolled out across the College, and is ongoing (Aug 2018). Internal Audit of DP presented to Audit Committee, May 2018.

Commentary (Update):

Re 1. Following the merger there was a risk of an equal pay challenge if males and females were doing work of equal value and being paid differently. This matter was addressed with the implementation of job evaluation.

Re 4. A recent appeal to the SIC was upheld; however this found only that a request should have been dealt with under Environmental Information Regulations rather than FOISA. The information concerned was still withheld as commercially sensitive, quoting the relevant EIR Regulation (10) (5) (e) rather than the appropriate FOISA exemption. Quantity and complexity of FOI requests is noted as increasing significantly. Reportage to Audit Committee undertaken from 2017.

Re. 7 (Safeguarding/PVG challenge) above: Criminal convictions declaration required at application and enrolment. For staff a risk assessment is conducted if a member of staff has an unspent conviction.

Re. 12. All policies in place as appropriate, with training provided as necessary. SMT and the Audit Committee had noted in 2013-14 that many Policies and Procedures required an Equalities Impact Assessment (EQIA). As the first deadline for completion (Feb 2014) was not met, the risk score for this risk had been elevated to 6 Amber. SMT confirmed that by June 2014, all Policies and Procedures had recorded completed EQIAs. As at October 2015, all Policies and Procedures have recorded completed EQIAs. Policy and Procedure tracker now in place with ongoing

monitoring of approval status and review dates.

Re. 13: Ongoing high priority given to maintaining compliance with UKVI regulations, following cessation of collaboration with Bangladeshi partner (WMA), following UKVI advice.

Re 14: PREVENT training delivered to SMT - September 2016. Prevent Policy drafted and reviewed by Corporate Care WG Dec 2017. Prevent raining module under development (at April 2018). Prevent Policy endorsed by SMT for Board Committee approval (April/May 2018).

Re.15: The Board of Management undertook training on corporate parenting responsibilities under the Children and Young People Act in February 2017. This was provided by Who Cares? Scotland and included input from a care experienced young person. Corporate Parenting Action Plan developed and reviewed by Student Staff and Equalities Committee October 2017).

Re 16: The Audit Committee noted advice from the External Auditor regarding the Protection of Personal Data Directive from the EU (which the UK Government will extend post-Brexit). " While the **Regulation** will enter into force on 24 May 2016, it shall apply from **25 May 2018**. The **Directive** enters into force on 5 May 2016 and EU Member States have to transpose it into their national law by **6 May 2018**." Ref: http://ec.europa.eu/justice/data-protection/
Failure to comply with the directive could result in very considerable fines being imposed.

A paper has been presented to SMT (August 2017) and was included on the Audit Committee agenda (September 2017). Risk MAP 24 addresses GDPR compliance - now developed, reviewed, and updated as part of the regular Risk Management cycle). SMT has agreed the formation of a Data Management WG to progress a series of recommendations relating to GDPR compliance .

The College's readiness for the new GDPR directive was the subject of Internal Audit (April 2018) reported to the Audit Committee on 16 May 2018. The Committee noted that:

> "Whilst the College has reviewed the requirement of the GDPR and identified areas where work is required to comply (which is set out in a detailed action plan), it was noted that the College does not currently have an approved Information Security Policy. An interim measure has been put in place with a draft Policy to be finalised by the second half of 2018. As appropriate action is being taken, no recommendations have been made."
>
> (IA Report to Audit Committee May 2018)

Risk score of 10 AMBER approved at Audit Committee, June 2017.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10/25 RAG Rating: AMBER **Target Score: 5**	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Compliance/ Reputation **Low** Medium High **1** 2 3 4 5 6

Impact					
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5
x	Likelihood				

Risk Management Action Plan

Risk Description: Failure of Business Continuity

Risk ID: 12

Owned by: VPCS/CSP   **Review Date: November 2018**

Update

Full Description:

1. Severe Fire/Flood
2. Terrorist attack
3. IT Systems Failure (incl Cybercrime) - See Risk MAP 25.
4. Other emergency circumstances resulting in main service failure, and threatening the operation of the College as described in Business Continuity Plan v3.9.

Treatment:
1. Maintain current operational controls.
2. Create and regularly review Business Continuity Plan (BCP).
3. Communicate plan to all senior staff.
4. Ensure that local recovery plans are developed and reviewed.
5. Test and Review at local and College level.

Commentary (Update):

1. Current operational controls are in place with responsibility transferred to GLQ via the NPD contract. Responsibility for communication remains with the College.

2. The BCP emergency incident procedure is currently under review to include recent government guidelines outlined by the CONTEST statutory duty. The BCP has been reviewed with a revised disaster recover plan for all technology systems, and the College has also revised all fire evacuation procedures and identification of incident control rooms at City and Riverside (hard copy BCP located at these locations and at Reception Desks). The BCP has been revised (as at January 2018) in consultation with VP Infrastructure and Head of Facilities Management, with updated contact details of contractors, senior staff etc. and located on Connected (BCP v3.9). The BCP has recently been successfully invoked (7[th and] 21st November 2017) and found to be effective (see incident report below). SMT has subsequently reviewed and approved the latest version (v3.9) of the BCP.

3. GLQ has an extensive business continuity plan to which the College BCP refers, given that the knowledge of all business critical systems lies with GLQ. These systems are subject to a 25 year maintenance agreement/project agreement. As our operational relationship with the onside contractors continues to develop, we will further refine our BC planning to reflect detailed responsibilities. All heating, cooling, power, air conditioning etc is part of the NPD contract with all risk transferred to GLQ, with commensurate business continuity responsibility. GLQ would therefore be responsible for repurposing space disrupted by systems failure. The College remains responsible for re scheduling of activity affected by disruption.

<u>4. IT Disaster Recovery Plan (See Risk MAP 25 for updates from October 2017).</u>

Cybercrime: The network infrastructure designed as part of the new build meets the latest filtering and access control technical requirements. In order to test the College's infrastructure, this will be included in the Internal Audit of infrastructure (brought forward to 2016-17 in the light of this priority) This included IT security and was completed as "Satisfactory". It should be noted that this threat is largely related to business disruption, as the college business can be maintained in alternative modes.

In May 2017, following the cyber attacks affecting the Scottish NHS, the Infrastructure section was involved in an IT Network Arrangements/Security audit, and timeous on-going work on our Business Continuity strategy and Disaster Recovery Plans. This was presented to the full Board in June 2017, and included the following detail of the mitigations taken:

- Patching around 9% of our end-user devices which were considered potentially vulnerable. Consideration that a percentage of these are in Staff and Students own hands and not physically present in College.
- Patching many of our critical servers whilst still providing continuous service.
- Proactive monitoring of network services and network traffic.

The general malware attack knows as WCry/WarCry, is not the only malware/security threat that the College is attending to at this time. Furthermore, Industry researchers are anticipating the techniques discovered and hoarded by the NSA, of which Wcry was one, will be used with malicious intent in the near future. The College remains diligent to potential threats.

<u>Incident Reports</u>
1. On November 7th 2017 there was an incident - loss of water supply at City Campus - involving the invocation of the Business Continuity Plan by VP Infrastructure in agreement with VP Student Experience. The incident was due to a failure of a water valve restricting water supply. The Emergency Response Team met immediately upon the incident being reported, and followed the appropriate BCP checklists and processes including Team Leader Emergency Response and Loss of Water checklists. The Emergency Response Team undertook an assessment of the incident level (Level 2, BCP P16), and management of the incident. The incident was assessed as critical to ongoing business at City Campus, and the Emergency Response Team decided to curtail the majority of College activity for the day, while maintaining a reduced staff complement.

2. On Tuesday 21 November 2017, a suspicious unattended package was identified on College premises at City Campus at 19.45hrs. The Duty Manager called the emergency services, and a special disposal unit was consequently in attendance to control the incident. Some evening classes were in progress at that time, and staff and students were safely evacuated from the building. The item was found to be harmless, and was identified as a custom-built device left by an employee of FES during a routine window battery installation.

The incident was followed up with FES by the VP Infrastructure and the Principal to ensure that no similar incidents happen in future.

3. On Wednesday 22 November, there was a temporary loss of electrical supply at Riverside Campus, due to an external power outage. There were no injuries, and no

requirement for the emergency services. As a consequence, the operation of lifts management was reviewed, and FES staff training for release of lifts was implemented.

These incidents were reviewed and recorded on the appropriate BCP Incident Report form, including lessons learned and improvement actions implemented.

Strategic Review of Business Continuity Management: 2018 Report

This review was undertaken by Ashton Resilience in March 2018, for the College insurers UMAL, by arrangement with the Infrastructure team. The review looked at the activities and operations of the College, its current recovery capability and the degree to which BCM has 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 will involve firstly conducting a business impact analysis then documentation of business recovery plans for each area, based upon coherent recovery strategies.

The report stated that:

" The high priority recommendations in this report are that the City of Glasgow College should:
- Conduct a business impact analysis and service impact analysis for key processes right across the College.
- Identify recovery time objectives for critical business activities and IT services.
- Identify recovery resources, dependencies and strategies for operational recovery.
- Complete the creation of new departmental business continuity / recovery plans to cover all critical areas of the College, using the business impact analysis data as the base."

An implementation plan to address the report recommendations is under development for approval by ELT/SMT (August 2018);

It is proposed that this risk score remains RED until the key recommendations are enacted. (August 2018).

The responsibility for infrastructure (and associated impact analyses/recovery resource assessment) has now passed to the VP Corporate Services (November 2018).

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 3/5 Impact 5/5 Risk Score 15/25 RAG Rating: RED **Target Score: 5** Change from 4x5=20 approved by Audit/BoM March 2018	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Business Continuity **Low** Medium High **1** 2 3 4 5 6

Impact					
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5
x	Likelihood				

Risk Management Action Plan

Risk Description: **Negative impact of Industrial Action**

Risk ID: 14

Owned by: **VPCS**   **Review Date: Sept 2018**

Update

Full Description:

1. Negative impact upon service delivery due to industrial action
2. Negative impact upon reputation due to industrial action

Treatment:

Two local negotiating forums are established, LNC and SSNC, with the frequency of meetings based on the College Recognition & Procedure Agreement (RPA) and current requirements.

The College has signed the National Recognition & Procedure Agreement (NRPA) and is a member of the Employers Association within Colleges Scotland. All pay and terms and condition negotiations now take place at the National Joint Negotiating Committee (NJNC).

Commentary (Update):

The Human Resources (HR) department is now managed by the HR Director reporting to the Vice Principal Finance & HR. Significant changes have been progressed within the HR team to improve the performance and service with further planned improvements.

The national bargaining process is continuing through the Employers Association and NJNC. The NJNC reached a settlement for the April 2017 pay claim with the support staff trade unions however are still in dispute with the teaching staff union (EIS). The support staff April 2017 annual cost of living pay award included £425 per FTE and a minimum annual leave entitlement of 44 days.

The NJNC have conducted extensive negotiations with the EIS to agree standard pay grades and terms and conditions. Following 6 days of strike action a headline agreement was reached with the EIS on the 19th May 2017 with the remaining core terms agreed in November 2017.

In the past 2 years the sector has been subject to 2 period of EIS industrial action and a single period of support staff trade unions industrial action. The Employer Association

are aiming to continue to progress all outstanding issues with the unions and achieve sustainable agreements without further industrial action. Given the EIS's excessively high expectations for the April 2017, 2018 & 2019 annual cost of living awards and the generous national bargaining agreement it is likely than over the next 6 months there may be further industrial action. The EIS plan to open a consultative ballot on the 11th September 2018 to support their continuing cost of living pay dispute.

Negotiations with the support staff unions for the April 2018 cost of living award is continuing more positively however there is still significant concern regarding the implementation of job evaluation.

The College is actively involved in the national bargaining process however the outcomes and consequences of the process are not within the College's control therefore local staff relationships have become more difficult. There continues to be a significant minority of staff across the sector that view the previous industrial action as very successful and are keen to take further industrial action to further improve their pay and terms and conditions.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 3/5	Likelihood 5/5
Impact 4/5	Impact 5/5
Risk Score 12/25	Risk Score 25/25
RAG Rating: AMBER	
Target Score: 4	
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium **High**	Category: Student Experience/ Reputation
	Low **Medium** High
	1 2 **3** 4 5 6

	5	10	15	20	25
	4	8	12	16	20
	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
x			Likelihood		

Impact

Risk Management Action Plan

Risk Description: Failure to achieve operating surplus via control of costs and achievement of income targets

Risk ID: 15

Owned by: VPCS   **Review Date: Sept 2018**

Update

Full Description:

Failure of the College's Strategic Priority 7, and associated Strategic Aims: To maintain our long-term financial stability.

The College's aim is to produce at least a balanced budget annually at 31st March and an underlying operating surplus annually at 31st July.

Commentary (Update):

The current Income & Expenditure current projections are shown in (Appendix 1).

Operating Surplus/Deficit

The College achieved an operating surplus in the Resource Return at 31st March 2017 and delivered an underlying operating surplus in the 2016-17 annual accounts. The College made no transfer to the College Foundation in March 2017.

In the 2017-18 financial plan the College will budget for a small underlying operating surplus (£111k) which means a relatively small adverse change to expenditure or income budgets will push the College into an underlying operating deficit. The current Income & Expenditure current projections (Appendix 1) shows an improved underlying operating surplus of £332k. The most significant challenges will be in the subsequent years of the 5 year financial planning with increasing deficits projected due to the impact of the following risks:

Income: SFC Grant

The key risks are;

- Failure to achieve future Credit target.
- Future SFC regional funding not sufficient to meet increased costs.
- GCRB teaching grant allocation to the College not sufficient to meet increased costs.
- Future reduction in SFC ESF funding.
- GCRB capital maintenance grant allocation to the College not sufficient to meet investment requirements.

Income: Course Fees

The key risks are;

- Failure to achieve the fee income target.
- Failure to deliver future years income growth.
- Future changes to the population demographics.

Income: Non SFC Fundable Course Fees

The key risks are;

- Failure to achieve the income target.
- Failure to deliver future years income growth.
- Failure to meet industry demands and expectations.

Income: Other Income:

The key risks are;

- Failure to achieve the income target.
- Failure to deliver future years income growth.
- Wider UK & international economic pressure and performance.
- Failure to meet industry demands and expectations.
- Student accommodation performance and potential increased competition.

Expenditure: Staff Costs:

The key risks are;

- Failure to effectively control the staff cost budget.
- Managing staff absence levels and temporary staff contracts.
- Increasing costs from national bargaining agreements.
- Delivering a staff structure that improves service and performance while minimising the staff cost budget.
- Future impact of inflation and union demand for higher annual cost of living pay awards.
- Impact of ongoing staff industrial relations issues.

Expenditure: Operating Expenses

The key risks are;

- Failure to effectively control the operating expenses budget.
- Managing the NPD contract costs and performance.
- Future impact of potentially higher inflation.

Given the improved underlying operating surplus projection, the VP Finance and HR is confirming the reduction of the risk score to 3x3 = 9. Audit Committee agreed to refer

this proposed change to the FPRC – 23 May 2018 (noted by BoM March 2018) and confirmed by the FPRC May 2018.

Approved by Board of Management June 2018.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 3/5 Impact 3/5 Risk Score 9/25 RAG Rating (Overall): AMBER **Target Score: 4** (Risk Score changed from 4x5 = 20 RED; FPRC May 2018) Target score increased from 2 (FPRC May 2018) Agreed: Audit Committee Sept 2018 **Target Score: 4**	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite **(Willing to accept):**	**Risk Tolerance** **(Able to accept):**
Low Medium High	Category: Finance Low **Medium** High 1 2 **3** 4 5 6

Impact					
	5	10	15	20	25
	4	8	12	16	20
	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
X	Likelihood				

CITY OF GLASGOW COLLEGE INCOME AND EXPENDITURE ACCOUNT						APPENDIX A
	2018/19	2017/18	2016/17	2015/16		2018/19
	12-month Budget @ May 18	12-month Projection @ May 18	12-month Actual	12-month Actual Audited		Movement 2018/19 v 2017/18
	£000s	£000s	£000s	£000s		£000s
Income						
SFC Grants	66,356	62,756	59,019	40,187	1	3,600
Tuition fees and education contracts	18,327	18,064	18,248	17,098	2	263
Other income	5,607	5,641	4,955	3,852	3	(33)
Other income - Sale of Buildings	0	0	0	0	4	0
Grant from Foundation	500	3,598	2,410	6,515	3	(3,098)
Investment income	25	25	34	59	5	0
Total income	**90,816**	**90,084**	**84,666**	**67,711**		**732**
Expenditure						
Staff Costs	49,523	46,438	44,847	41,517	6	3,085
Other operating expenses	32,340	32,192	32,514	17,410	7	148
Other operating expenses - Sale of Buildings	0	0	0	0	8	0
Depreciation	10,244	10,011	9,957	4,316	9	233
Voluntary Severance	0	2,420	0	1,837	10	(2,420)
Total expenditure	**92,107**	**91,061**	**87,318**	**65,080**		**1,046**
Operating Surplus / (Deficit)	**(1,291)**	**(977)**	**(2,652)**	**2,631**		**(314)**
Loss on sale of fixed asset	0	0	(843)	0		0
Operating Surplus / (Deficit) after loss on sale of fixed asset	**(1,291)**	**(977)**	**(3,495)**	**2,631**		**(314)**
STATEMENT OF HISTORICAL COST SURPLUSES AND DEFICITS FOR THE YEAR ENDED 31 JULY						
Operating Surplus / (Deficit)	(1,291)	(977)	(3,495)	2,631		(314)
Difference between historical cost depreciation and the actual charge for the period calculated on the revalued amount	128	128	652	249		0
Historical cost Surplus/(Deficit) for the period	**(1,163)**	**(849)**	**(2,843)**	**2,880**		**(314)**
Pension Adjustments	0	0	1,419	1,335		0
Foundation Adjustments	785	(205)	(1,437)	(5,833)		990
NPD	901	1,224	2,488	158		(323)
Loss on sale of fixed assets	0	0	843	0		0
Grant Release from fixed asset sale	0	0	0	0		0
Building valuation write down	0	0	0	1,837		0
Revalutaion reserve	(128)	(128)	(652)	(249)		0
Net Depn (now excluded SFC guidance)	**237**	**290**	**524**	**1,221**		**(53)**
Underlying Operating Surplus	**632**	**332**	**342**	**1,349**		**300**

Risk Management Action Plan

Risk Description: Failure to maximise income via diversification

Risk ID: 16

Owned by: VPCS/ VPCDI   **Review Date: Oct 2018**

Update

Full Description:

Failure to optimise income opportunities via existing and potential markets and partners.

Treatment:

Develop of Corporate Development Plan to deliver the College Corporate Development

Strategy. Manage and monitor the delivery of the plan.

Commentary (Update):

The Corporate Development Strategy was approved by the Board of Management Development Committee and contains plans, initiatives and targets to meet the overall College strategic priorities.

Commercial and International Teams, as well as Academic Faculties, have reviewed all aspects of income diversification. This is now reflected within the new Corporate Development Strategy as well as Financial and Operational Plans. Income generation from Industry Academies included in Faculty planning.

Regular reportage on growth and development in relation to targets is now a standing item on the Development Committee agenda. The Corporate Development Team and Faculties undertake ongoing reviews of Commercial and International targets, and progress. The College performance reviews has been undertaken and reviewed the delivery of Non SFC Fundable course fee income.

Update:

The College set a conservative 2017-18 target for Non SFC Fundable course fee based on the 2016-17 actual. The 2017-18 budget for non SFC Fundable course fees was agreed at a higher income target of £8.1m incorporating a proportion of the new Flexible Workforce Development Fund (FWDF) activity (£500k). The initial Non SFC Fundable course fee income target also incorporated an anticipated reduction in overseas income of £147k. There was a significant challenge for the Corporate Development Team and Faculties to deliver the new FWDF activity therefore the target was set at £500k rather than the full £894k we have only delivered £110,000 of training at 31st July 2018.

The College was well below the 2017-18 annual target (appendix 1). The majority of the shortfall is commercial course delivery in City Enterprise and the Faculties. The estimated income for 2017-18 is £614k below the actual income for 2016-17.

The future years' challenge is to significantly increase the College income from non SFC funding sources and effectively reduce the proportion of SFC grant. In 2018-19 the SFC grant is estimated as 73% of the College income (includes the NPD funding & National Bargaining funding).

The Non SFC Fundable course fee target for 2018-19 was again set conservatively at the same level as 2017-18 (excluding Flexible Workforce Development Fund – see report to Development Committee, October 2018).

The Risk Score has been increased in consideration of the actual income delivered over the past 2 years, which is significantly below target - agreed by Audit Committee 12 September 2018, and noted by the Finance and Physical Resources Committee on 26 September.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 4/5 Impact 3/5 Risk Score 12/5 RAG Rating: AMBER **Target Score: 9**	Likelihood 5/5 Impact 4/5 Risk Score 20/25
Risk Appetite **(Willing to accept):**	**Risk Tolerance** **(Able to accept):**
Low Medium High	Category: Change and Development/ Financial Low **Medium** High 1 2 **3** 4 5 6

Impact					
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5
x	Likelihood			

Student Recruitment Planning Commercial Fee Income Summary

Faculty	Commercial Fees Target 17/18	Commercial Fees Proj 17/182	Educational Contract Fees Target 17/18	Educational Contract Fees Proj 17/18	HE Articulation Fees Target 17/18	HE Articulation Fees Proj 17/18	Overseas Fees Target 17/18	Overseas Fees Proj 17/18	TOTAL NON FUNDABLE Fees Target 17/18	TOTAL NON FUNDABLE Fees Proj 17/18	TOTAL NON FUNDABLE Fees Actual 16/17	Compare 17/18 to 16/17	TOTAL NON FUNDABLE Fees Target 18/19	Compare 18/19 to 17/18
Business	£354,270	£319,374	£341,695	£316,687	£392,243	£369,017	£12,700	£435	£1,100,908	£1,005,514	£1,080,354	-£74,840	£962,975	-£42,539
Creative Industries	£13,076	£23,028	£146,300	£196,600	£0	£13,035	£6,350	£6,350	£165,726	£239,013	£199,875	£39,138	£189,988	-£49,025
Building, Engineering & Energy	£219,222	£91,423	£0	£0	£456,646	£393,090	£6,350	£13,135	£682,218	£497,648	£759,613	-£261,965	£462,110	-£35,537
Leisure and Lifestyle	£57,855	£63,685	£168,147	£207,722	£190,338	£258,127	£0	£6,785	£416,340	£536,319	£580,037	-£43,718	£513,801	-£22,519
Nautical	£2,583,325	£2,328,255	£0	£0	£0	£0	£1,829,997	£1,808,669	£4,413,322	£4,136,924	£4,464,795	-£327,871	£4,302,859	£165,935
Education and Society	£434,801	£437,908	£0	£83,377	£0	£13,036	£19,230	£27,100	£454,031	£561,422	£396,246	£165,176	£546,125	-£15,297
City Ents	£369,370	£186,460	£0	£0	£0	£0	£0	£0	£369,370	£186,460	£307,288	-£120,828	£209,591	£23,131
World Skills	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Organisational Development	£0	£11,072	£0	£0	£0	£0	£0	£0	£0	£11,072	£0	£11,072	£3,928	-£7,145
Total	**£4,031,919**	**£3,461,206**	**£656,142**	**£804,387**	**£1,039,227**	**£1,046,306**	**£1,874,627**	**£1,862,474**	**£7,601,915**	**£7,174,372**	**£7,788,208**	**-£613,836**	**£7,191,376**	**£17,003**
FWDF	£0	£0	£500,000	£110,000	£0	£0	£0	£0	£500,000	£110,000	£0	£110,000	£650,000	£540,000
Grand Total	**£4,031,919**	**£3,461,206**	**£1,156,142**	**£914,387**	**£1,039,227**	**£1,046,306**	**£1,874,627**	**£1,862,474**	**£8,101,915**	**£7,284,372**	**£7,788,208**	**-£503,836**	**£7,841,376**	**£557,003**

Risk Management Action Plan

Risk Description: Negative Impact of Brexit

Risk ID: 22

Owned by: VPCS/DCS   **Review Date:** Nov 2018

Update

Full Description:

The key sub risks of Brexit for the College are identified as follows:

1. Loss of European grant funding. The College will receive ESF grant funding of £2.4m in 2018/19.

2. Loss of European Programme funding (Erasmus+, Leonardo, Marco Polo) Skills Development Scotland manage funds, which are partly supported by European Union money, and which Colleges access, for example, Modern Apprenticeships. Any reduction in funding such as this will impact on Region activity.

3. Loss of European contracts where our partner is EU funded (previous Malta contract)

4. Impact on shipping industry

5. CoGC EU Students – numbers in 17/18 were 1,588 from 30,403

6. CoGC EU Staff – very few EU staff (3.25% of total headcount)

Treatment:

1. The Scottish Funding Council has responsibility for managing the European Social Fund (ESF) and the Youth Employment Initiative (YEI). SFC has said that they will work with the Scottish Government, colleges and universities to assess the impact of the outcome of the referendum and to manage that impact, with its priority being to reduce uncertainty for students and institutions in both the short term and the longer term.

2. UK's participation in most of these is assured for at least the next two years and the funding available in many of these programmes is about to increase significantly between now and Programmes' end dates in 2020. It is not clear at this early stage what the impact of Brexit will be on the Erasmus Programme longer term.

3. Securing new partnerships or contracts on EU funded projects will become more challenging.

4. As a leading provider of Maritime Education in the UK, we are actively engaged in discussion with the UK Chamber of Shipping to ensure that we can contribute, where appropriate, and take advantage, where new opportunities are emerging

5. We will monitor this minor risk in light of wider national developments

6. Given the current staff profile any change linked to Brexit will have a minor impact.

Commentary (Update):

The College stands to lose a significant amount of EU funding. At the current time it is unclear how or whether this gap will be filled.

We will continue to monitor the implications of BREXIT for the College and, as more detail emerges, ensure that we carry out analyses of the implications for students and the potential impact on income streams and overall strategic direction for the College, Region and for the sector.

We are an active member of the recently established Colleges' Brexit Forum. Membership of the Forum, which is chaired by Paul Smart, Scottish Government, Head of Colleges, Young Workforce and SFC Sponsorship Division includes representation from Scottish Funding Council, Scottish Government, Unions, NUS, Colleges Scotland and Colleges (including CoGC). The purpose of the group is 'to consider collectively how our colleges, including their staff and students, continue to thrive in the context of the UK's withdrawal from the Europe Union.' Key objectives of the group include the facilitation of communication between SFC, colleges and Government and to ensure that Ministers are kept informed of the potential impacts of Brexit on the sector and to consider actions to be taken in mitigation of the impact or risks of Brexit. A more detailed report will be presented to December's Board meeting.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 5/5 Impact 2/5 Risk Score 10 /25 RAG Rating: AMBER **Target Score: 5**	Likelihood 5/5 Impact 3 /5 Risk Score 15/25
Risk Appetite **(Willing to accept):**	**Risk Tolerance** **(Able to accept):**
Low Medium High	Category: Finance? Low **Medium** High 1 2 **3** 4 5 6

	5	**10**	15	20	25
	4	8	12	16	20
Impact	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
x			Likelihood		

Risk Management Action Plan

Risk Description: **Failure to agree a sustainable model and level of grant funding within Glasgow Region**

Risk ID: 23

Owned by: VPCS   **Review Date: Sept 2018**

Update

Full Description:

Context:

While approving the new campus development and funding, the Scottish Funding Council (SFC) also confirmed their commitment to 210,000 WSUMs (subsequently referred to as 180,000+ Credits) of funded activity once the campus was complete.

In February 2015 the Scottish Government, SFC, Glasgow Colleges Regional Board (GCRB), and the three College Boards agreed a Curriculum and Estates Strategy for Glasgow, and in doing so, ensured that the City of Glasgow College receives the equivalent of 210,000 WSUMs within an agreed timeframe. Within the agreed 2015-2020 Curriculum and Estates Plan for the Glasgow Region to ensure that the grant-funded activity level target for City is achieved. Although the annual total volume of funded activity has been agreed, the value of the funding is still subject to annual discussion and agreement.

SFC announces annually the initial regional funding allocations following which GCRB allocate funding to the three Glasgow Colleges.

Commentary (Update):

In 2015-16 & 2016-17, 26 staff were TUPE transferred from Kelvin to City; no further staff transfers are required. The transfer of Credits within the region agreed in the Curriculum and Estates Plan for the Glasgow Region was completed in 2016-17.

SFC announced the 2017-18 initial regional funding allocation incorporated a transitional adjustment to reduce the impact from the introduction of the new funding methodology. The transitional adjustment for Glasgow is a negative £1.1m and is by far the largest adjustment of any Region. The Regional funding allocation for 2017-18 ensured that City exceed the agreed activity level of 180,000+ Credits.

The 2018-19 GCRB funding allocation means that City has the lowest grant per Credit in the sector at £219 per Credit compared to the Glasgow Regional average of £240 and the sector average of £248.

The SFC Capital Maintenance grant allocation within the Region is extremely disappointing for City of Glasgow College. The Glasgow allocation based on the regional Credit was £6.3m and City's proportionate share should have been £2.6m however GCRB have only allocated City £1.3m. In 2016-17, City also received a disproportionately low SFC Capital Maintenance grant and was the only College not to receive any share of the additional £10m SFC Capital Maintenance grant funding.

The level of uncertainty regarding the value of future funding is still high with significant risk linked to SFC and GCRB funding methodology. Significant issues for future GCRB College funding allocations are;

- Capital funding
- ESF funding
- National bargaining funding
- IT infrastructure funding

This risk is being mitigated by robust curriculum planning at City and close involvement with GCRB and the other Glasgow Colleges.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 3/5	Likelihood 5/5
Impact 4/5	Impact 5/5
Risk Score 12/25	Risk Score 25/25
RAG Rating: AMBER	
Target Score: 5	

Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Financial **Low** Medium High 1 **2** 3 4 5 6

Impact	5	**10**	15	20	25
	4	8	**12**	16	20
	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
x			Likelihood		

Risk Management Action Plan

Risk Description: Failure of Compliance with the General Data Protection Regulations (GDPR)

Risk ID: 24

Owned by: DCS/CSP   **Review Date: August 2018**

Update

Full Description: Failure to be effectively prepared as an organisation to comply with the GDPR from its commencement in May 2018.

Detailed risks:

- Significant fines for non-compliance.
- The GDPR also makes it easier for individuals to bring private claims against organisations.
- Where we fail to comply there are clear reputational risks for the College both with external stakeholders and with our staff and students.

Treatment:

Clear implementation project. Extensive and CoGC bespoke training programme for staff to be rolled out. Engagement with JISC to validate and augment internal findings and recommendations. Internal Auditor has reported that we have a valid plan to be 'GDPR ready' by 25 May 2018.

Commentary (Update):

The Audit Committee noted advice from the External Auditor regarding the Protection of Personal Data Directive from the EU (which the UK Government will extend post-Brexit).

The General Data Protection Regulations (GDPR) will come into force in the UK from 25 May 2018.

Failure to comply with could result in very considerable fines being imposed and the possibility of reputational damage.

A paper has been presented to SMT (August 2017) and was included on the Audit Committee agenda (September 2017). The Risk Management Action plan was included on the College high level Risk Register from September 2017.

Many of the GDPR's main concepts and principles are much the same as those in the current Data Protection Act (DPA). The College's current approach to compliance will remain valid under the GDPR and can be the starting point to build from. However, there are new elements and significant enhancements, so we will have to do some things for the first time and some things differently.

The impact of the GDPR is dependent upon the nature of an organisation's business, the personal data it processes and what it actually does with that data. We are currently carrying out a data audit and mapping exercise. This will ensure that we understand clearly what are doing with both the data of students and employees across the organisation. This exercise is enabling us to prioritise areas for action and identify what aspects of the GDPR will have the greatest impact on the College.

If we as an organisation take the time to properly prepare for and comply with the new Regulation then we will not only avoid the risk of significant fines and reputational damage, but take advantage of the opportunity to improve our data handling and information security systems and our compliance processes and to ensure that our contractual, staff and student relationships are more professional, robust and reliable.

Update as at 19/2/18

A series of audit and legal/practical advice meetings have been carried out by the Director of Corporate Support with teams and staff across a wide range of business areas, selected to ensure coverage of key data sets and processes. This has already significantly raised awareness across the College. A report on findings and recommendations for process improvements has been shared with JISC who are carrying out a validation exercise for us. JISC was appointed via competitive process in January 2018 to support our preparation process and carry out this review and validation exercise.

A project plan is in place and being managed by the Director of Corporate Support.

A training plan is in place which will deliver awareness training to all staff before end May 2018. This will include a bespoke online module and face to face training. The face to face training sessions have already started.

The ICO recognises that the process of complying with the new legislation will not be 'complete' by 25 May 2018 and in fact will probably never be 'complete' since there will always be room for improvements and new data entering and leaving large organisations. However, organisations do need to be able to demonstrate that they are aware of the legal requirements, understand the personal data they hold and how well they are managing it, have a plan to tackle areas where there is room for improvement and have taken all reasonable steps to raise awareness amongst staff. The College's project plan seeks to achieve that.

Update as at 10/5/18

The project plan for GDPR readiness was validated by our Internal Auditor in April and we remain on track to deliver the key components of the ICO's 12 Step Recommendations. The audit report did highlight a weakness in that we do not have an Information Security Policy in place for staff. As an interim measure advice on info sec is included as standard in all data protection training and an advice email will be circulated to staff by ICT.

The recommendations report referred to above was presented to SMT on 18 April and a decision was made to form an Information Management Group. The group has key responsibilities under the new Data Protection policy and will review and oversee

implementation of these recommendations for action, which seek improve our compliance with data protection law and reduce the risks of data being lost or compromised.

Awareness raising continues:

- Over 200 key staff have attended face to face data protection training delivered by the Director of Corporate Support;

- An online module is about to be launched and will be compulsory for all staff;

- The Staff Privacy Notice has been issued;

- A website page is being set up to host all key College information on data protection; and

- SMT considered GDPR reports and procedures on 18 April and 2 May 2018.

Governance reporting includes:

An update was provided to the Performance, Nominations and Remuneration Committee on 30 April 2018;
The new Data Protection Policy was approved by the Audit Committee on 15 May 2018; and a report was provided to the Board on 6 June 2018.

The internal Audit of Data Protection was presented to the Board in May 2018, and stated that:

"Whilst the College has reviewed the requirement of the GDPR and identified areas where work is required to comply (which is set out in a detailed action plan), it was noted that the College does not currently have an approved Information Security Policy. An interim measure has been put in place with a draft Policy to be finalised by the second half of 2018. As appropriate action is being taken, no recommendations have been made."

Update as at 3/09/18

- There is a dedicated website page hosting all relevant data protection related procedures and notice.

- New data privacy impact assessment procedures have been introduced for all projects where significant amounts of personal data are being processed e.g. new ICT systems or information sharing with new external partners.

- There is a privacy notice available for all board members and prospective board members.

- The information management group met on 26 June 2018.

- Further training continues.

- The online compulsory staff module has been available since May 2018.

- An update report was provided to SMT on 29 August 2018.

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 4/5 Risk Score 8/25 RAG Rating: AMBER Changed from 2x5 = 10 – AMBER, due to impact mitigations as described above; Audit Committee 17 May 2018 **Target Score: 5**	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
<u>**Low**</u> Medium High	Category: Compliance/ Reputation <u>**Low**</u> Medium High **1** 2 3 4 5 6

Impact					
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5
x	Likelihood				

Risk Management Action Plan

Risk Description: Failure of IT System Security

Risk ID: 25

Owned by: VPCS   **Review Date: August 2018**

Update

Full Description:

1. Cybercrime
2. Other emergency circumstances resulting in main service failure, and threatening the operation of the college as described in Business Continuity Plan v3.9.

Treatment:
1. Maintain current operational controls.
2. Review Business Continuity Plan (BCP).
3. Ensure that IT Disaster Recovery plans are developed and reviewed.
4. Test and Review at local and College level.
5. Planning for introduction of GDPR.
6. Adoption and compliance with UK Government Cyber Essentials Plus recommendations.
7. Enhance security cyber defence and response capability within college IT services.

Commentary (Update):

Cybercrime: The college network infrastructure remains effective in utilising defensive and detection measures to mitigate the risk of cyber attacks. However, the persistent and constantly evolving threat of criminal and malicious activity, along with emerging vulnerabilities, new technologies and the rise of nation state actors in this arena, require an ongoing programme to maintain a diligent defence to potential threats.

-   Antivirus software to counter malware / ransom ware
-   Centralised management and configuration of devices
-   Active network monitoring tools
-   Web and email filters to quarantine suspicious material
-   Intruder prevention / detection measures to counter active hackers
-   Port filtering and automated defence measures against network attacks (e.g. Distributed Denial of Service)
-   Protection against data & web vectors (e.g. SQL injection)
-   Awareness raising programmes, policy and guides to counter social engineering / Phishing
-   Role based permissions and segregation of access to minimise risk of accidental damage and internal attacks
-   Encryption to defend against data loss / theft.

To reduce the likelihood of a failure the college has taken the following additional measures:

- The College has renewed subscriptions for two of the leading antivirus providers (Bitdefender and Sophos). This means that the College benefits from a multi-vendor approach to security across campus.

- The College physical IT estate (classroom and staff PCs) has been refreshed with the latest version with an improved management platform for Sophos to enable quicker alerting to incidents.

- The College VDI platform has been updated to use Bitdefender due to better "on demand" scanning for VDI.

- The College is configuring servers to scan central file storage using both versions of AV to ensure that any zero day exploit risk is minimised.

- The College continues to monitor and apply security patches to desktop machines, network devices and server infrastructure.

- The College has a clear plan for implementing GDPR including a review of data and systems with associated recommendations for improvements. (There is a standalone risk plan for Data Protection – Risk MAP 24).

- The College will ensure that effective IT Disaster Recovery plans and preventative measures are in place.

- The College is reviewing and updating our Information Security policy to reflect changing requirements.

- The College will pursue adoption of UK Government Cyber Essentials Plus to demonstrate high standards of security governance.

The following measures are also proposed to enhance the depth and scope of our cyber resilience capability:

- The College will seek to identify IT security competencies within existing staff and consolidate to share best practice. We will also seek to formally identify specialist IT security responsibilities to be assigned to specific posts as part of the current Leadership restructure.

- The College will develop and extend our Cyber Essentials programme towards the adoption of ISO 27001 IT Security standards (existing strategic target to evaluate options by 2020).

- Improvements to incident response / reporting through Operations Desk to reduce the impact of potential breaches.

- Alignment of the college capital investment programme with security infrastructure lifecycles to maintain a viable cyber resilience environment.

- The College will evaluate measures for the effective management and remote

support of external assets such as mobile devices and laptops to improve standardisation of security measures and reduce risk from theft or loss.

Risk Score: agreed change to 2x5 = 10 AMBER due to the need for formal adoption of some measures as above, and additional measures required. (Audit Committee & FPRC May 2018)

Responsibility for this Risk has passed to the VP Corporate Services (November 2018)

Current Risk Score:	Gross Risk Score (assuming no treatment)
Likelihood 2/5 Impact 5/5 Risk Score 10 /25 RAG Rating: AMBER Target Score: 5	Likelihood 5/5 Impact 5/5 Risk Score 25/25
Risk Appetite (Willing to accept):	**Risk Tolerance (Able to accept):**
Low Medium High	Category: Business Continuity **Low** Medium High **1** 2 3 4 5 6

Impact					
5	10	15	20	25
4	8	12	16	20
3	6	9	12	15
2	4	6	8	10
1	2	3	4	5
x	Likelihood				

Risk Register: 08 November 2018

Strategic Theme	Risk Name	Risk ID	Level	Risk Owner	Likelihood	Impact	Net Risk Score	Gross Risk Score	Target Risk Score	Risk Movement	Link to Risk Mgt Action Plan (MAP)	Date of last review
					CURRENT EVALUATION			**AIM and PROGRESS**			**RISK TREATMENT**	
Students	Failure to support successful student outcomes	1	1	VPSE	2	5	10	25	5		Risk 1 MAP.docx	Oct '18
Students	Failure to establish optimal pedagogical model	2	1	VPSE	1	5	5	20	5		Risk 2 MAP.docx	Aug '18
Students	Failure to achieve good student outcome/progression levels	3	1	VPSE	2	5	10	15	5		Risk 3 MAP.docx	Aug '18
Students	Failure of the College's Duty of Care to Students	21	1	VPSE	1	5	5	20	4		Risk 21 MAP.docx	Oct '18
Growth and Development	Failure to realise planned benefits of Regionalisation	4	1	Pr/DPr	3	3	9	20	3		Risk 4 MAP.docx	Sept '18
Growth and Development	Negative impact upon College reputation	6	1	VPCDI	2	5	10	25	5		Risk 6 MAP.docx	Oct '18
Growth and Development	Failure to achieve improved business development performance with stakeholders	7	1	VPCDI	2	5	10	25	5		Risk 7 MAP.docx	Oct '18
Growth and Development	Failure to achieve improved performance	8	1	VPSE/DirP	2	5	10	20	5		Risk 8 MAP.docx	Aug '18
Growth and Development	Failure to attract, engage, and retain suitable staff	9	1	VPCS	2	2	4	20	3		Risk 9 MAP.docx	Sept '18
Processes and Performance	Negative impact of statutory compliance failure	10	1	CSP/DCS	2	5	10	20	5		Risk 10 MAP.docx	Aug '18
Processes and Performance	Failure of Compliance with the General Data Protection Regulations (GDPR)	24	1	DCS/CSP	2	4	8	25	5		Risk 24 MAP.docx	Sept '18
Processes and Performance	Failure of Corporate Governance	11	1	Pr/CSP	1	5	5	20	5		Risk 11 MAP.docx	Aug '18
Processes and Performance	Failure of Business Continuity	12	1	VPCS/CSP	3	5	15	25	4		Risk 12 MAP.docx	Nov '18
Processes and Performance	Failure of IT system security	25	1	VPCS	2	5	10	25	5		Risk 25 MAP.docx	Aug '18
Processes and Performance	Failure to manage performance	13	1	VPSE/DirP	1	4	4	20	4		Risk 13 MAP.docx	Aug '18
Processes and Performance	Negative impact of Industrial Action	14	1	VPCS	3	4	12	25	4		Risk 14 MAP.docx	Sept '18
Finance	Failure to achieve operating surplus via control of costs and achievement of income targets.	15	1	VPCS	3	3	9	25	4		Risk 15 MAP.docx	Sept '18
Finance	Failure to maximise income via diversification	16	1	VPCS/VPCDI	4	3	12	20	4		Risk 16 MAP.docx	Sept '18
Finance	Failure to obtain funds from College Foundation	20	1	VPCS	1	4	4	20	4		Risk 20 MAP.docx	Sept '18
Finance	Negative impact of Brexit	22	1	VPCS/DCS	5	2	10	tbc	5		Risk 22 MAP.docx	Nov '18
Finance	Failure to agree a sustainable model and level of grant funding within Glasgow Region	23	1	VPCS	3	4	12	25	5		Risk 23 MAP.docx	Sept '18

Key:
Pr - Principal
DPr - Depute Principal
VPSE - Vice Principal Student Experience
VPCS - Vice Principal Corporate Services
VPCDI - Vice Principal Corporate Development/Innovation
FD - Faculty Director
CSP - College Secretary/Planning
DHR - Director of Human Resources
DirP- Director of Performance
DCS - Director of Corporate Support
DirP- Director of Performance

Recent/Proposed change

x	Likelihood				
Impact 5	5	10	15	20	25
4	4	8	12	16	20
3	3	6	9	12	15
2	2	4	6	8	10
1	1	2	3	4	5

2017-18 Trend						
Date	Jun-17	Aug 17	Oct-17	Dec-17	Feb-18	Apr-18	Jun-18
Average Risk Score	10	10	9.76	9.56	9.50	9	9

N.B. Closure of low-scoring risk will impact upon average risk score for 2018-19.

Tolerance vs Risk Score	Acceptable Risk Score		Acceptable Risk Score		Acceptable Risk Score	
	1-3	4-5	6-9	10-12	15-16	20-25
Risk Management Level of Tolerance (Able to Accept)	1	2	3	4	5	6
	Low		Medium		High	