City of Glasgow College

Board of Management
Audit & Assurance Committee

Date of Meeting	**Monday 10 March 2025**
Paper No.	**AAC3-F**
Agenda Item	**5.6.1**
Subject of Paper	**Internal Audit Report – External Communications & Marketing**
FOISA Status	**Disclosable**
Primary Contact	**Henderson Loggie**
Date of production	**19 February 2025**
Action	**For Discussion and Decision**

1.   Recommendations

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

2. Purpose of report

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

3. Key Insights

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

4. Impact and implications

Refer to internal audit report.

Appendix: Internal Audit Report – Student Support Funds 2023-24

City of Glasgow College

External Communications and Marketing

Internal Audit report No: 2025/02

Draft issued: 17 February 2025

Final issued: 19 February 2025

Henderson
Loggie

Contents

Level of Assurance

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

Gradings are defined as follows:

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

Action Grades

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

Management Summary

Overall Level of Assurance

Good	System meets control objectives.

Risk Assessment

This review focused on the controls in place to mitigate the following risks on the City of Glasgow College ('the College') Risk Register (as at November 2024):

- SR6 – Negative impact upon the College's reputation (Net Score – 9, Medium).

Background

As part of the Internal Audit programme at the College for 2024/25, we carried out a review of the systems in place for External Communications and Marketing. The Annual Plan, agreed with management and the Audit and Assurance Committee on 27 November 2024, identified this as an area where risk can arise and where Internal Audit can assist in providing assurances to management and the Audit and Assurance Committee that the related control environment is operating effectively, ensuring risk is maintained at an acceptable level.

Oversight of the College's External Marketing and Communications processes rests with the Vice Principal Corporate Development and Innovation, who is a member of the College's Executive Leadership Team (ELT). The College's Director of Communications, supported by the Head of Marketing and Communications, manages the College's Communications Department who administer these processes. The College's ELT also holds a shared responsibility for ensuring that there are adequate procedures in place to enable the College to maximise the impact of any positive publicity generated and to effectively manage the impact of any negative publicity.

The College has a suite of policies and guidelines in place to manage these processes, including External Communications Guidelines, Internal Communications Guidelines, an Incident Management Plan and a Social Media Policy. This documentation defines the procedures in place at the College, which are designed that a consistent approach is taken when communicating externally on behalf of the College and internally with College employees. Specific roles and responsibilities for managing internal communications and external engagement with stakeholders, media outlets, via the College's website and through social media platforms, is shared between the members of the Marketing and Communications team.

The College's guidelines define the requirement for all College employees to direct any media queries and requests to the Marketing and Communications team. This approach is designed to ensure that an appropriate, informed, response is provided, which has been assessed for any reputational risk to the College. Where any designated spokespersons are identified to speak directly with the media, then these nominated members of staff are provided with media and interview training by the Director of Communications, to ensure they are adequately prepared.

Background (Continued)

The College has multiple social media accounts in place, which are managed by the Marketing and Communications team. These platforms are governed by the College's Social Media Policy and are overseen centrally on the Orlo system to ensure a consistent message is published across all platforms. The personal social media accounts of College employees are also governed by this policy, with staff expected to uphold the College's values on their personal accounts.

Scope, Objectives and Overall Findings

This audit focussed on the systems in place within the College for the management of positive and negative publicity externally, and internal communication.

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

Objective		Findings		
The objective of our audit was to ensure that:		**1**	**2**	**3**
		No. of Agreed Actions		
1. Policies, procedures and systems in place assist the College to maximise the benefits from positive publicity and effectively manage negative publicity, reducing the potential risk of damage to the College's reputation.	**Good**	0	0	1
2. Appropriate strategies, procedures, ICT and other systems are in place to assist and encourage internal communication and joint working between campuses and Academic Faculties / Support Services.	**Good**	0	0	0
Overall Level of Assurance	**Good**	**0**	**0**	**1**
		System meets control objectives.		

Audit Approach

The Director of Communications, along with the Head of Marketing and Communications and the Communications Department, the Head of Innovation and STEM, and the Brand & Design Manager , were interviewed to determine current working practices.

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

The results of recent staff surveys relevant to internal communication were also reviewed to ensure that issues raised were being addressed where appropriate.

Summary of Main Findings

Strengths
- The College defines engagement with stakeholders as a key part of the Planning Cycle within its 2021-2030 Strategic Plan.
- The College has an External Communications Guidelines document in place, which defines the approach to be undertaken by College staff when communicating with stakeholders and media partners.
- An Incident Management Plan is in place which defines the approach for managing the internal and external communications in the event of a significant disruptive incident.
- A Crisis Communications Guidelines document is also in place to supplement the Incident Management Plan.
- An Internal Communications Guidelines document is in place which details the methods of internal communications between staff and across campuses.
- A Website Content Writing Guide is in place which defines the language and tone of voice to be used.
- Opportunities for maximising positive publicity are assessed on a case-by-case basis to determine whether the information is shared internally, to industry specific publications, or the national media.
- The College's response to any negative publicity is managed by the Director of Communications and the Head of Marketing and Communications, with the Executive Leadership Team consulted where required.
- Media training is provided to all members of staff who are required to undertake interviews or engage with the press on behalf of the College.
- A Social Media Policy is in place which defines the College's approach to communicating on both official College accounts and employee personal accounts.
- An internal review was undertaken over the College's internal communications processes by the Internal Comms and Media Officer with changes applied following this.
- The Orlo system is used by the College for scheduling social media posts.
- Design jobs and workflows are recorded on the Design team's SharePoint site.
- The College's Communications Department is a central function for both campuses, with a physical presence at both campuses.
- Employee recognition processes are in place for sharing positive news stories across the College.
- Forms are in place for ensuring a consistent process is undertaken for organising College events, including the marketing of these.

Opportunities for Improvement
- From our discussions with the College's Director of Communications and Head of Marketing and Communications, it was noted that the College's Brand Identity Guidelines do not currently specify the need to obtain the explicit agreement of the relevant partners, to share partner branding, prior to publication of marketing material.

Acknowledgments

We would like to take this opportunity to thank the staff at City of Glasgow College who helped us during the course of our audit visit.

Main Findings and Action Plan

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

Procedures and Guidelines

In order to define the processes in place across internal and external communications, marketing strategies, social media and the College's website, the College has a suite of procedures and guidelines in place, including:

- External Communications Guidelines;
- Crisis Communications Guidelines;
- Incident Management Plan;
- Email Best Practice Guide; and
- Website Content Writing Guide.

From inspection of these documents, the following was noted:

External Communications

The External Communications Guidelines document details the six principles to approaching external communications at the College. These are as follows:

- Accuracy and Transparency: All external communications must be accurate, truthful, and transparent;
- Consistency: Communications should reflect the College's values, vision, and strategic objectives consistently;
- Responsiveness: The College will strive to respond promptly to external inquiries, requests, and feedback;
- Respect: Communications should respect the diversity, opinions, and sensitivities of stakeholders;
- Compliance: All external communications must comply with relevant laws, regulations and College policies; and
- Authorised Spokespersons: Only designated individuals are authorised to speak on behalf of the College to the media or public.

The guidelines also document the responsibilities of key staff at the College. In particular, this includes the Executive Leadership Team (ELT), the Communications Department, authorised spokespersons and all College employees. In addition to this, the guidance documents the high-level requirements for undertaking external communications via the national media, social media / online, crisis communications and partnerships / collaborations. The document is available to all staff across the College and reiterates the requirement for all staff to direct any media enquiries to the Communications Department.

Email Best Practice Guide

As email is a key form of communication at the College, the Email Best Practice Guide defines various recommendations, which the Communications Department encourage staff to consider when communicating via email. These recommendations include the use of standard email formatting for consistency; being clear and concise; tailoring the content for the audience; and using appropriate punctuation. Additionally, the Guide notes the need to acknowledge incoming emails and to reply promptly to contacts, as this can ultimately have an adverse impact on the external perception of the College.

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

Incident Management Plan and Crisis Communications Guidelines
The College's Incident Management Plan and Crisis Communications Guidelines detail the College's approach for addressing major incidents / significant disruption within the College. This includes the communication of any relevant information to staff and stakeholders. The Incident Management Plan notes the Director of Communications as being responsible for ensuring effective communications are in place and heading up the channels available. From inspection of the Incident Management Plan, it was established that there is an action checklist specifically for communications, to which all staff can refer in the event of disruption.

The Crisis Communications Guidelines document provides more detailed guidance on the College's approach to preparing controlled responses to an incident or negative publicity. This includes noting the need to identify opportunities to frame any negative comments into a positive narrative, in a timely manner. This is documented as being the responsibility of the Director of Communications, supported by the Head of Marketing and Communications.

Website Content Writing Guide
From our discussions with the Director of Communications and the Head of Marketing and Communications, it was noted that the tone of communication - and how publications refer to the College - should be consistent across all media outputs. Therefore, the Website Content Writing Guide notes the requirements around tone of messaging, use of language, and correct grammar and punctuation. Additionally, the specifics on how to refer to the College campuses and national qualifications is clearly documented to ensure that this is consistently applied. This document is made available to all members of staff. However, it was noted that the Communications Department review all content published on the College website, which is prepared by staff across the College, prior to the content being uploaded, to ensure that the College guidelines are being adhered to.

Positive Publicity
It was noted from our discussions with the Director of Communications and the Head of Marketing and Communications that they encourage management across the College to promote any "good news stories". These are identified through discussions at various team meetings, operational discussions with departmental managers, and through day-to-day engagement with departmental staff across the College. Any positive news stories are assessed on a case-by-case basis by the Head of Marketing and Communications and the wider Communications Department for promoting these. Discussions are held with the subject matter expert to establish whether to only publish the story internally, or externally to a trade specific audience (i.e. trade journals) or to the College's contacts at national media outlets.

The Director of Communications attends Senior Management Team (SMT) meetings and raises questions on any upcoming promotional content with other members of the SMT. The Head of Marketing and Communications holds regular meetings with Deans and Associate Deans, which provides a platform to flag any upcoming positive stories relating to their departments. This allows them to highlight the stories to the Communications Department and plan for the promotional activity, based on the priority of the story / event. The Principal also prepares opinion pieces on work ongoing within the College - or on national issues affecting the College. These are initially published on the College website but can be picked up by national media outlets, depending on the nature of the story.

External Communications and Marketing

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

<u>**Negative Publicity**</u>
The College has a media monitoring service in place, Vuelio, which provides reports on mentions of the College in the press, and the associated engagement with this media coverage. This is reviewed regularly by the Communications Department and assists in the timely management and response to any negative media generated. The College's social media tool, Orlo, is utilised to track engagement, and therefore any negative sentiment towards the College, on its social media channels.

As set out in the External Communications Guidelines and Crisis Communications Guidelines, all media enquiries and any negative press require to be managed and responded to by the Director of Communications and the Head of Marketing and Communications, in consultation with the relevant member of the ELT, where required. It was highlighted through our discussions with the Head of Marketing and Communications that they primarily deal directly with journalists, with support provided by other members of the Communications Department where deemed appropriate.

The Director of Communications highlighted that in the event of negative press coverage, they seek to identify the most positive way of dealing with the issue. After drafting a response, this is reviewed by the relevant senior manager, prior to being published. In recent years, industrial disputes and national strikes have resulted in an increased number of queries from the press and other parties. Given the status of the College and the position as the largest College in Scotland, the College have taken a proactive stance in developing draft responses in anticipation of this press interest, following the confirmation of any planned strike action. If the query comes directly from a member of the press, then the Communications Department is contacted for comment by the outlet. The Director of Communications and / or Head of Marketing and Communications then consider what the nature of the story is likely to be. A response is then drafted in line with the above process.

From our discussions with the Director of Communications, it was noted that media training is provided to all members of staff who are required to undertake interviews or engage with the press on behalf of the College. This is undertaken by both the Director of Communications and Head of Marketing and Communications, who provide the spokesperson with guidance on what questions to anticipate, body language and tone of voice. This has been undertaken for members of the ELT, including the Principal, and other key staff across the College.

In addition to the Communications Department maintaining a list of key contacts within specific national publications, it was highlighted by the Head of Marketing and Communications, that operational management in some departments have their own contacts within the media. However, the message was reinforced that despite these relationships with media outlets, all external communications are still channelled through the Communications Department.

The College has an established approach for dealing with negativity on social media, with the base position not to engage in most instances. It was noted that the Communications Department also has the facility to hide negative comments, where deemed appropriate, in order to protect members of staff / students or College stakeholders. Through discussions with the Branding and Design Manager, it was noted that when working with partner organisations, including national brands, the College utilises its Brand Identity Guidelines to ensure that a consistent approach is taken, with the input from the partner brands proportionate to their involvement in the area concerned. It was highlighted that although the partner organisations have their own brand guidelines, the College's publications prioritise the College's brand, and this ensures that up to date College logos etc. are used by the other organisations.

External Communications and Marketing

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

Observation	Risk	Recommendation	Management Response	
Through our discussions with the College's Director of Communications and Head of Marketing and Communications, it was noted that the College's Brand Identity Guidelines do not currently specify the need to obtain the explicit agreement of the relevant partners, to share partner branding, prior to publication of marketing material.	There is a risk that the College does not obtain approval for the use of partner / supporting branding on College publications prior to issue, potentially resulting in negative feedback from the partner organisation.	**R1 –** It is recommended that the College updates its Brand Identity Guidelines to mandate the requirement to obtain formal approval of the use of partner brands from their respective marketing / design departments, in advance of publication.	A new page will be added to the current Brand Guidelines document to confirm the approval process when the College uses partner logos in College literature. **To be actioned by:** Head of Communications & Marketing **No later than:** 31 March 2025	
			Grade	3

External Communications and Marketing

Objective 2 – Strategies procedures, ICT and other systems are in place to assist and encourage internal communication and joint working between campuses and Academic Faculties / Support Services.

Internal Communications Guidelines
The College has an Internal Communications Guidelines document in place which documents the key methods of internal communication at the College, with these identified as follows:

- Email: Email will be the primary channel for official announcements, memos, and updates from management;
- Intranet: The College's intranet platform MyConnect will serve as a central hub for accessing documents, policies, and internal news;
- Meetings: Regular team meetings, departmental meetings, and all staff meetings will provide opportunities for in-person communication and collaboration;
- Newsletters: Periodic newsletters may be distributed to employees to highlight achievements, share updates, and promote engagement;
- Large Screens: Digital screens placed in common areas will display important announcements and upcoming events; and
- Instant Messaging: Instant messaging platforms may be used for quick, informal communication within teams.

From discussions with the Head of Marketing and Communications, it was identified that the internal communications mechanisms are used as a vehicle for promoting positive stories, particularly through the intranet site (MyConnect for staff and Citylife for students). In addition to these, the screens in place across the College's two campuses are utilised for promoting key stories and any urgent messages.

Internal Review and Survey
It was noted that in 2024, the Internal Communications and Media Officer undertook an internal review over the internal communications mechanisms in place at the College. This involved a survey being issued to all staff detailing the different internal communications channels in place at the College and asked the employees' opinions on areas for improvement. Focus groups were then held with a cross section of staff across the College, which considered the specific reasons for any areas identified which staff did not find useful. This was followed by interviews with management to establish best practice methods for sharing information across the College. Following this process, the Internal Communications and Media Officer prepared recommendations for improving internal communications, including reducing the number of emails distributed and enhancing the information on the intranet. The formal report on this exercise was under review by the College's ELT at the time of this audit, for final sign off of the recommended actions.

Joint Working
Discussions were held with the Head of Innovation and STEM and the Brand and Marketing Manager to establish the joint working processes in in place. From these discussions, it was noted that the College's departments engage with the Communications Department on an ad-hoc basis and on a cyclical basis for student recruitment. It was noted from discussions with the Head of Innovation and STEM that events are a key method of joint working between operational departments and the Communications Department. This is due to the variety of areas required to be considered, including promotion both internally and externally, designing the event material, and establishing the focus of the advertising material with the subject matter experts. The Communications Department therefore work with the relevant departments to gather information to ensure they are communicating the key purposes of the event to the appropriate audience. This helps to ensure the event achieves its objectives and attendance targets.

External Communications and Marketing

Objective 2 – Strategies procedures, ICT and other systems are in place to assist and encourage internal communication and joint working between campuses and Academic Faculties / Support Services (continued).

It was noted from our discussions with the Brand and Design Manager that the requests are received directly from operational departments for branded material, either for internal use within the department or for external advertising/ communication. In addition to this, the Design team work with the Communications Department to promote any courses which have been identified by the relevant Curriculum Head as not achieving expected application targets. The Communications Department and the Design team then work with the relevant Curriculum Head to develop promotion material and potential advertising mechanisms to generate awareness of the vacancies. This exercise is often undertaken in the Spring/Summer months, however, targets are monitored regularly by the Curriculums and therefore they can reach out to the Communications Department and/ or the Design team at any time.

It was established that in addition to ad-hoc works, there is a cyclical nature of the College's operational departments engaging with the Communications Department. Primarily, this is due to the operational departments being aware of the need for the Communications Department to spend a significant amount of time and resources on the campaigns for student recruitment, which falls at the same time each year. These activities include the preparation of prospectuses, advertising campaigns and the arrangement of open days. Any ad-hoc communications are therefore pushed to the Communications Department at a reduced rate during these times due to the saturation on social media and the traditional media.