GITY OF GLASGOW COLLEGE

Assurance Framework

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Charity Number: SCO 36198

Assurance Framework Policy

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Assurance Framework

1. Introduction

1.1. This framework has been developed in response to guidance included in the Scottish Government's Audit and Assurance Handbook and an external audit recommendation (External Audit Annual Report 2018-19).

2. Purpose and Aims

- **2.1.** The purpose of this Assurance Framework is to provide support to the Chief Accounting Officer and Board of Management in meeting their leadership duties and corporate governance obligations, with respect to organisational stewardship, and to the management of risks that threaten the delivery of public service delivery objectives.
- **2.2.** The Assurance Framework provides a structure to the evidence underpinning the assessment of the risk and control environment, affirmed in the College's annual Governance Statement included in the Annual Report and Accounts. This evidence is supported by an independent appraisal from the College's internal auditors.
- **2.3.** In developing this framework, reference is made to HM Treasury guidance and associated process overview and mapping examples, and to the Scottish Government's Audit and Assurance Handbook.
- **2.4.** The benefits of improved coordination of assurance are the enhancement of organisational management of performance, efficient and effective operation, and improved reportage and public accountability. HM Treasury summarises the benefits of an effective assurance framework thus:
 - Provides timely and reliable information on the effectiveness of the management of major strategic risks and significant control issues;
 - Facilitates escalation of risk and control issues requiring visibility and attention by senior management, by providing a cohesive and comprehensive view of assurance across the risk environment;
 - Provides an opportunity to identify gaps in assurance needs that are vital to the organisation, and to plug them (including using internal audit) in a timely, efficient and effective manner;
 - Can be used to raise organisational understanding of its risk profile, and strengthen accountability and clarity of ownership of controls and assurance thereon, avoiding duplication or overlap;
 - Provides critical supporting evidence for the production of the Governance Statement:
 - Can clarify, rationalise and consolidate multiple assurance inputs, providing greater oversight of assurance activities for the Board/Audit & Assurance Committee in line with the risk appetite; and
 - Facilitates better use of assurance skills and resources.

3. Scope

3.1. The scope of this framework applies to all aspects of College's provision and functions, and those with executive responsibility to the Board of Management for such activity.

4. Principles and Concepts

The Assurance Framework

4.1. This is intended to provide a simple reference for the systemic structured approach to performance delivery, management, and reportage, and the management of risk to the achievement of the College's strategic priorities and aims. The framework is owned by the Principal as Accounting Officer, with oversight by the Board of Management (as delegated to the Audit & Assurance Committee).

Three Lines of Defence

4.2. There are different types of assurance each best used in different ways to maximise effectiveness and best results. The model referred to in the Scottish Government Audit and Assurance Handbook and other appropriate guidance, to outline an optimal mix of assurance, is the Three Lines of Defence Model. The model broadly involves the following:

Line 1: Management Assurance from Front Line Operations

- **4.3.** This includes reports from senior managers to the Board and its various committees, including progress reports, updates, and performance reports on operations supporting the advancement of the College's strategic plan. This will include monitoring statistics, reports on routine system controls, risk management action plans, and other management information.
- **4.4.** This comes from those responsible for the delivery of specific objectives, functions, and operations, and provides assurance that performance is being managed, that risks are identified as appropriate and managed, and that objectives towards strategic aims are being achieved. While this type of assurance is not independent, it has the strength of being provided by those who know the business of the College, and the day-to-day challenges and operational planning involved in specific functional areas.

Line 2: Oversight of Management Activity

- **4.5.** This would typically involve approaches to quality control, finance management, performance management and risk management. This is separate from, but not independent of the management chain, and involves processes and systems regularly reviewed by the Board and its committees and is subject to internal audit review.
- **4.6.** Essentially it is associated with oversight of management activity by the Board and its committees and would include reviews and assessments undertaken to determine whether strategic priorities and policies are being met in line with expectations, via appropriate processes and procedures. For example: purchaser to pay systems, health and safety, data control and information assurance, as well as strategic development and organisational change etc.
- **4.7.** Second line assurance is more objective than first line, as it references set expectations, policy, and/or regulatory considerations.

Line 3: Independent/Objective Assurance

4.8. This third line of assurance relates to independent, objective assurance, with a focus on the programme of work undertaken by internal audit and the College's Compliance Auditor, specifically designed to provide the Accounting Officer with an independent and

objective opinion on the framework of governance, risk management and control. HM Treasury describes this aspect of internal audit's role as:

"Internal audit will place reliance upon assurance mechanisms in the first and second lines of defence, where possible, to enable it to direct its resources most effectively, on areas of highest risk or where there are gaps or weaknesses in other assurance arrangements. It may also take assurance from other independent assurance providers operating in the third line, such as those provided by independent regulators, for example."

- **4.9.** This involves the Internal Service appointed by the Board of Management, Education Scotland, Scottish Funding Council/Glasgow Colleges' Regional Board, adherence to applicable codes and regulations, external reviews of effectiveness, various accreditations (e.g. Cyber essentials+, ISO).
- **4.10.** The College's Internal Auditors and the Compliance Auditor operate to professional and ethical standards in carrying out their work, independent of the management line and associated responsibilities. Reports compiled by the Internal Auditors and the Compliance Auditor will be shared with the relevant Board Committee for oversight.

External Audit

4.11. The College's external auditors are deemed to sit outside these three lines of internal assurance, and are appointed by, and report to, the Auditor General for Scotland. The External audit function is thus entirely external to the College with a statutory responsibility for certification audit of the financial statements and governance matters. Nevertheless, it is important that internal audit and external audit work effectively together to the maximum benefit of the organisation and in line with international standards

Assurance Mapping

- **4.12.** The Assurance Framework is mapped against the same framework as the College's Strategic Plan 2021-20, Risk Register and Management Action Plans (MAPs). This achieves the key objective of alignment with strategic priorities, significant risks, key processes and any significant strategic change programmes. Assurance providers are aligned to their position within the Three Lines of Defence model.
- **4.13.** The Audit & Assurance Committee may thereby review the adequacy of controls and assurance in a structured way, with oversight of the layers and interaction of the types and level of assurance provided, linked to strategic aims and to key business systems/processes. Reference would be made to the level of risk appetite associated with each category of risk within the Risk Management Policy. In this way, the sufficiency of available evidence of assurance may be ascertained, in proportion to the risk exposures concerned. The Committee may wish to draw attention to areas where:
 - risk is being appropriately managed (no action needed);
 - risk is inadequately controlled (action needed to improve control);
 - risk is over controlled (resource being wasted which could be diverted to other use); and/or
 - there is lack of evidence to support a conclusion. If this concerns areas material
 to the organisation's operations more assurance work may be needed, subject to
 an assessment of costs and benefits.

- **4.14.** The Audit and Assurance Handbook also provides some detailed prompt questions to assist the Committee in ensuring that their review of assurance is comprehensive.
- 4.15. Assurance Framework: See Appendix 1.

5. Responsibilities

Board of Management

5.1. The Board of Management is responsible for the College's Governance Statement which is informed by the implementation and review of the assurance framework by the Board's Audit & Assurance Committee.

Executive Leadership Team

5.2. The Executive Leadership Team is responsible for ensuring the implementation of Business Management, Corporate Oversight, and Independent Assurance "Lines of Defence" outlined in the Framework.

Associate Director of Governance and Risk

5.3. The Associate Director of Governance and Risk is responsible for the development and ongoing review of the Assurance Framework.

Compliance Auditor

5.4. The Compliance Auditor assists the ELT and the Board in the identification of any weaknesses or gaps within the provision of assurance and compliance and supports actions to rectify any such weaknesses, including the co-ordination of management actions and those in response to internal/external audit recommendations.

6. References

6.1. Policy Framework

Associated Policies and Procedures	Title
Policy	Risk Management Policy
Procedure	Risk Management Procedure
Strategy	College Strategic Plan 2021-30

6.2. Other College Policies and Procedures

Policy / Procedure	Title

6.3. External References

Source	Title
Scottish Government	Audit and Assurance Committee Handbook (2018)
HM Treasury	Assurance Frameworks (2012)
International Federation of Accountants (IFAC)	International Standards on Auditing ISA 610 and 315
Scottish Government; Good Governance Steering Group	Code of Good Governance for Scotland's Colleges (2022)

7. Document Control and Review

Approval Status	Approved
Approved by	Audit & Assurance Committee
Date Approved	21 March 2023
EQIA Status	EQIA Conducted? Yes: No:
Proposed Review Date	June 2026
Lead Department	Executive Office
Lead Officer(s)	Associate Director of Governance and Risk
Board Committee	Audit & Assurance Committee
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8. Revision Log

Version	Section of	Description of Revision					
Date	Document	·					
Draft 2.0	Draft	Draft version, initially shared with Principal, VPCS, Convener of Audit Committee.					
Draft 2.1 February 2020	4.5	Addition of para 4.5 re. proposal for additional internal function following College Secretary meetings with Principal and Convener of Audit Committee.					
Draft 2.2 August 2020	Framework	Development of Assurance checklist records					
Versions 2.3-4	Framework	Updates to assurance recording					
Version 2.5	Framework	Completed assurance checklist for Audit & Assurance Committee November 2020; Approved Feb. 2021					
Version 2.6	6.1 and 7	Updated references to Strategic Plan and AAC.					
February 2022	Framework	ELT review of Framework; AAC review.					
Version 2.7	4.1	Minor changes to expand the abbreviations used.					
February 2023	4.2	Update to include role of the Compliance Audit					
	4.4.3	Inclusion of Assurance for Committee name.					
	4.5	Section removed.					
	Appendix 1	Removed, to be updated and replaced.					
	Appendix 2	Brief description added for Compliance Auditor re					
Version 3.0	All	Transferred Framework to new template.					
March 2024	Various	"College Secretary" title changed to "Associate Director of Governance and Risk" throughout.					
	4.9	Replaced GCRB/SFC acronyms with full titles.					
	6.1	References to the Strategic Risk Register, MAPs and guidance removed.					
	6.3	Updated version of Code of Good Governance from 2016 to 2022.					
	Appendix 2	Section removed and paragraph detailing the role of the Compliance Auditor moved to section 5.					
Version 3.1	2 and 4	Sections amended for brevity.					
June 2025	Appendix 1	New Sources of Assurance developed. Amended Assurance Framework tabled for review and approved by the Audit & Assurance Committee.					

Appendix 1: Sources of Assurance (Reviewed: May 2025)

Appendix 1: Sources of Assurance (Reviewed: Source Strategic Plan			Risk F	Register		Assurance Providers		A&A Committee Assessment				
Ref	Category	Theme	Priority	ID	Title	Owner		Second Line of Defence: Oversight of	Third Line of Defence: Independent/	Control RAG	Satisfied Im	
1	Student Outcomes	Students	(1) To be an inspirational place of learning (2) To enable individuals to excel and realise their full potential	SR1	Failure to support successful student outcomes and progression	VPSE	Student Academic Experience Strategy Student Success Framework Careers Framework and Strategy College and TQEF quality cycle Faculty performance/portfolio reviews Faculty operational planning Curriculum planning City Attributes Learning & Teaching Academy Articulation routes with universities	Management • Level 1 Balanced Scorecard (Board) • Self-Evaluation Action Plan (Board) • Quarterly LTSE Report (LTSEC) • Academic Performance Report (LTSEC) • Annual Quality Engagement Report (LTSEC) • Student Academic Experience Strategy Progress Report (LTSEC) • SFC College Leaver Destinations and Student Satisfaction Reports (LTSEC)	Objective Assurance Internal Audits: Learning, teaching and student experience Other third party sources of assurance: External Audits: Performance Scottish Funding Council Scottish Qualifications Authority	RAG	Yes	tions Req.
	Learning, Teaching and Pedagogy	Students	(1) To be an inspirational place of learning(2) To enable individuals to excel and realise their full potential	SR1	Failure to support successful student outcomes and progression Failure to establish an optimal pedagogical model	VPSE	Student Academic Experience Strategy Student Success Framework Careers Framework and Strategy College and TQEF quality cycle Faculty performance/portfolio reviews Faculty operational planning Curriculum planning City Attributes Learning & Teaching Academy Student Association and representation systems Student surveys Articulation routes with universities	Level 1 Balanced Scorecard (Board) Self-Evaluation Action Plan (Board) LTSE Quarterly Report (LTSEC) Academic Performance Report (LTSEC) Annual Quality Engagement Report (LTSEC) Student Academic Experience Strategy Progress Report (LTSEC) CitySA Impact Report (Board/LTSEC)	Internal Audits: Learning, teaching and student Experience Other third party sources of assurance: External Audits: Performance Scottish Funding Council Scottish Qualifications Authority	•	Yes	
3	Student Support	Students	(2) To enable individuals to excel and realise their full potential	SR4	Failure of the College's duty of care to students	VPSE	Designated duty leads Safeguarding and corporate parenting policies, procedures and mandatory training Disclosure and Protecting Vulnerable Groups Scheme Criminal conviction declarations and risk assessments Student support, wellbeing and counselling services	Corporate Caring Duties Report (LTSEC) SPSO Annual Complaint Report (AAC)	Internal Audits: Student support and safeguarding Other third party sources of assurance: Scottish Public Services Ombudsman Disclosure Scotland	•	Yes	
4	People and Skills		(3) To live our values, value our people, and innovate in partnership		Failure to attract, engage, and retain suitable staff	VPPCS	People & Culture Strategy Workforce planning Staff Personal Development Review Staff integration and development Enhanced staff qualifications Staff surveys Occupational health, wellbeing and staff benefits Equality Impact Assessments Local and national recognition agreements with trade unions Internal committees and forums Accredited living wage employer and committed to Fair Work principles Flexible working, family-friendly policies	HR Metrics Report (PCC) Review of the People & Culture Strategy (PCC) Equality, Diversity & Inclusion Report (PCC) Public Sector Equality Duty Reports (PCC) Approval and oversight of College-wide organisational change (Board/PCC) Fair Work in Practice Report (BOM/PCC)	Living Wage ScotlandChartered Institute of Personnel and		Yes	

R	ef Category	Theme	Priority	ID	Title	Owner	First Line of Defence: Management Assurance	Second Line of Defence: Oversight of Management	Third Line of Defence: Independent/ Objective Assurance	Control RAG	Satisfied Im	provement tions Req.
A	Strategic Planning and Project Delivery	Growth and Development	(6) To be efficient, effective, innovative and vigilant		All entries on risk register	Pr	Operational and scenario planning Project Management Office	Strategic Plan and supporting strategies Strategic Planning Day			Yes	
A	6 Partnerships, Reputation & Communications	Growth and Development	(4) To be a valued partner of the city region, supporting the national economy, and the international learning community	SR6	Negative impact upon the College's reputation Failure to achieve improved business development with stakeholders	VPCDI	Corporate Development Strategy Internal and external communication support by the Brand & Communications team and agency advice Reputation and public sentiment analysis Business development process map Student satisfaction surveys Awards and recognition	Annual Report & Accounts (Board, FC and AAC) Principal's Quarterly Report (Board) Corporate Development Strategy Delivery Report (DC)	Internal audits: Reputation; internal/ external communications; business development; and stakeholder engagement	•	Yes	
A	7 Excellence in Performance and Processes	Performance and Processes	• •	SR9	Failure to manage performance and achieve improved performance	DE	Operational planning Directorate/faculty performance reviews College and TQEF quality cycle Curriculum planning Compliance with quality standards and marks Central coordination and administration of policies and procedures by the Performance team Process Procedure Review Committee Operational Effectiveness and Market Research Manager Reports Staff training and development	Annual Report & Accounts (Board, FC and AAC) Level 1 Balanced Scorecard (Board) Self-Evaluation Action Plan (Board) Academic Performance Report (LTSEC) Annual External Compliance Report (AAC) Review and approval of new policies and major changes to existing policies by the Board and its committees Review of the Policy and Procedure Register (AAC) HR Metrics Report (PCC)	Other third party sources of assurance: • External audit: Performance • Scottish Funding Council • Scottish Qualifications Authority • European Foundation for Quality	•	Yes	
A	8 IT Security and Development		(6) To be efficient, effective, innovative and vigilant	SR18	Failure of IT system security	DIT	Digital Strategy Incident Management Plan IT Business Recovery Plan Cyber Security Incident Response Plan and Playbooks Cyber Essentials Plus Operational controls and security monitoring Engagement with sector, regional and national partners and agencies	Digital Strategy Progress Report (PCC) IT Progress Report (PCC)	 Internal audits: IT, estates and facilities Other third party sources of assurance: National Cyber Security Centre (Cyber Essentials Plus) 	•	Yes	
A	9 Data Protection		(6) To be efficient, effective, innovative and vigilant	SR14	Failure of compliance with the General Data Protection Regulations (GDPR)	DPr	Data Protection Officer (supplied by contract with Thorntons Solicitors) to provide advice and support Staff training and development Compliance with the GDPR, including Records of Processing Activities (RoPAs) Data Protection Impact Assessments Data protection health checks with faculties and directorates	 Data Protection Quarterly Report (AAC) Data Protection Annual Report (AAC) Data Breaches Report (AAC) 	Internal audits: Data protection Other third party sources of assurance: Information Commissioner's Office Scottish Information Commissioner		Yes	

Ref Category	Theme	Priority	ID	Title	Owner	First Line of Defence: Management Assurance	Second Line of Defence: Oversight of Management	Third Line of Defence: Independent/ Objective Assurance	Control RAG	Satisfied	Improvement Actions Req.
A10 Legal and Regulatory Compliance		(6) To be efficient, effective, innovative and vigilant	SR12	Negative impact of statutory compliance failure	DPr ADGR	Advice, support and reporting from Governance & Risk, Finance, Procurement HR, EDI, Health & Safety and Estates/Facilities Policies and procedures, inc. Financial Regulations and Memorandum Written third party assurances Risk assessments, COSHH and RIDDOR Staff training, development and drills	 Data Protection Quarterly Report (AAC) Data Protection Annual Report (AAC) Data Breaches Report (AAC) FOI Annual Report (AAC) SPSO Annual Complaints Report (AAC) Financial Memorandum Delegated Limits and Expenditure Report (AAC/FC) Annual Procurement Report (FC) Non-Compliant Spend Report (FC) Health & Safety Annual Report (PCC) 	Internal audits: All Other third party sources of assurance: External audit: Performance; financial management/sustainability; vision,		Yes	
A11 Governance		(6) To be efficient, effective, innovative and vigilant	SR15	Failure of corporate governance	Pr ADGR	Leadership and management from the Principal & CEO, ELT and SMT Advice and support from ADGR Policies and procedures, inc. Financial Regulations and Memorandum Internal controls and reporting Certificates of Assurance Training and development Risk Register and Management Action Plans	Board and committee oversight and decision-making Standing Orders, Scheme of Delegation, Terms of Reference and Schedules of Business Code of Conduct and Register of Interests Annual Audit & Assurance Self-Evaluation Annual Board Self-Evaluation Board Development Plan/Day Strategic Plan and supporting strategies External Effectiveness Review Annual Report & Accounts (Board, FC and AAC) Committee Annual Reports Board member recruitment and appraisal Quarterly Strategic Risk Reviews			Yes	
A12 Estates and Infastructure	Performance and Processes	(2) To enable individuals to excel and realise their full potential (6) To be efficient, effective, innovative and vigilant		Failure to secure sufficient capital investment Failure to manage strategic, physical and digital assets and infrastructure effectively	DPr CFO	Planned and reactive maintenance by the Estates and Facilities teams Capital expenditure and maintenance planning with faculties and directorates Risk assessments, COSHH and RIDDOR Cleaning and waste management Energy management and enviornmental sustainability Person in Charge and Duty Managers First Aid and Emergency Plan Team Personal Emergency Evacuation Plans Incident Management Plan and Business Recovery Plans Property and campus development, inc. the Riverside Innovation Centre and Charles Oakley Building Asset management system, register, verification and review	Capital Expenditure Budget (FC)	Internal audits: Estates, facilities and IT Other third party sources of assurance: External audit: Use of resources to improve outcomes Scottish Funding Council Health & Safety Executive Historic Environment Scotland		Yes	

Ref	Category	Theme	Priority	ID CD12	Title	Owner	First Line of Defence: Management Assurance	Second Line of Defence: Oversight of Management	Third Line of Defence: Independent/ Objective Assurance • Internal audits: Finance and counter-	Control RAG		Improvement Actions Req.
AIS			(6) To be efficient, effective, innovative and vigilant		Negative impact of statutory compliance failure	DPr ADGR	 Procurement Strategy Advice, support and reporting from the Procurement team PECOS system and internal controls Contract management and planning Staff training, guidance and awareness Business Recovery Plan 	Annual Procurement Report (FC) Asset Disposal and Retention (FC) Non-Compliant Spend Report (FC)	Other third party sources of assurance: External audit: Financial management; and use of resources to improve outcomes	•	res	
A14			(6) To be efficient, effective, innovative and vigilant		Negative impact of statutory compliance failure	DPr ADGR	 Denial of opportunity through policies, procedures, systems and separation of duties Staff training, guidance and awareness Screening of new employees Montioring and detection measures National Fraud Initiative 	Reporting to the Audit & Assurance Committee Finance Committee	Internal audits: All Other third party sources of assurance: External audit: Financial management; and use of resources to improve outcomes	•	Yes	
A15	Financial Management, Sustainability and Value for Money	Finance	(6) To be efficient, effective, innovative and vigilant (7) To maintain our long-term financial stability (8) To secure diversity of income and sustainable development	SR20 SR21 SR23	Failure to achieve operating surplus Failure to maximise income via diversification Failure to obtain funds from the Foundation for the College's priorities Failure to secure a sustainable model/level of funding	CFO CFO CFO	Sustainability Strategy Coporate Development Strategy Budget planning and prioritisation Control of course fees, non-SFC funding, staff costs and expenditure Financial forecasting and planning Commercial and international income and partnerships City of Glasgow International Ltd Best Value Framework Prioritisation and preperation of funding bids to the City of Glasgow College Foundation	Draft Annual Budget (Board/FC) Draft Capital Expenditure Plan (Board/FC) S-Year Financial Projection (FC) Quarterly Financial Update (FC) Treasury Management Report (FC) College Course Fees and Accomodation Charges (FC) SFC Financial Forecast Return Commercial and International Performance Report (DC)	Internal audits: Finance and value for money Other third party sources of assurance: External audit: Financial management/ sustainability; and use of resources to improve outcomes Scottish Funding Council	•	Yes	

Key

AAC Audit & Assurance Committee

SoA Source of Assurance

Pr Principal & Chief Executive Officer

DPr Depute Principal & Chief Operating Officer

CFO Chief Financial Officer

VPSE Vice Principal Student Experience

VPCDI Vice Principal Corporate Development & Innovation

VPPCS Vice Principal People & Corporate Services

DE Director of Excellence

DSE Director of Student Experience

DIT Director of IT

ADGR Associate Director of Governance & Risk

Control RAG: Red SoA controls/category is absent,

inadequate or ineffective. Immediate action is required to address gaps/failures.

Control RAG: Amber SoA controls/category is partially effective

but has some weaknesses or limitations that need improvement.

Control: RAG Green SoA controls/category is effective,

functioning as intended and a reliable and sufficent source of assurance.