

AUDIT & RISK ASSURANCE COMMITTEE

AGENDA

A meeting of the Audit & Risk Assurance Committee will be held at 15:00 hours on Wednesday 24 May 2023 in the Sighthill, Boardroom.

		Lead Speaker	Paper
1	WELCOME & APOLOGIES	Chair	
2	DECLARATIONS OF INTEREST	Chair	
3	MINUTES OF PREVIOUS MEETING <i>for approval</i>	Chair	A
4	MATTERS ARISING REPORT		
4.1	Matters Arising Update	Chair	B
4.2	Business Committees of the Board Update		
	<ul style="list-style-type: none"> Policy & Resources Committee Learning, Teaching & Student Experience Committee 	A Williamson M Walker	Verbal Verbal
5	INTERNAL AUDIT REPORTS		
5.1	Summary of Audit Recommendations Report	A Williamson	C
5.2	Internal Audit Report: Sustainability	BDO	D
5.3	Draft Internal Audit Plan 2023/24 <i>for approval</i>	BDO	E
6	RISK ASSURANCE		
6.1	Risk Appetite & Tolerance Statement Update	A Williamson	Verbal
6.2	Risk Management Report	N Croft	F
6.3	Data Breach Incidents and Cyber Attacks Update	N Croft	G
6.4	Deep Dive: Recruitment, Retention & Enrolment Update	J Pearson	Verbal
7	EXTERNAL AUDIT: ANNUAL AUDIT PLAN YEAR ENDING 31 JULY 2023	Mazars	H
8	ANY OTHER COMPETENT BUSINESS		
8.1	Review of Committee Operation 2022/23	Chair	I
9	FOR INFORMATION		
9.1	Audit & Risk Assurance Committee Business Planner 2023/24		K
10	DATE OF NEXT MEETING: TBC		

N.B: The minutes of the Audit & Risk Assurance Committee are reported directly to the Board of Management, with an accompany commentary from the Committee Chair.

Title	Risk Management Update
Appendices	Appendix 1: Top level Risk Register Infographic April 2023 Appendix 2: Top Level Risk Register April 2023 Appendix 3: Business Continuity Management Plan – Adverse Weather
Disclosable under FOISA	Yes
Primary Contact	Nick Croft, Director of Communications, Policy & Research
Date of Production	05.05.23
Action Required	Approval / Discussion

1. RECOMMENDATIONS

The Audit & Risk Assurance Committee is asked to note the changes to the top-level college risks agreed by the Risk Management and Assurance Group (RMAG), and to approve the following documents as being fit for purpose before wider publication:

- Business Continuity Management Plan – Adverse Weather (Appendix 3)

2. PURPOSE OF REPORT

This paper provides an update on matters relating to risk management and business continuity at the College.

3. DETAIL

At its most recent meeting on 4 May 2023, the RMAG discussed the following:

Top Risk Register (Appendix 1 & 2 refers)

The RMAG agreed that the current top risks for the college are:

- (1) National bargaining impact on college operations
- (33) Financial sustainability (insufficient budget / funding to cover cost of living, job evaluation, employer pension contribution increases)
- (2) Student retention and attainment
- (24) Cyber security breaches within the college
- (32) Failure to meet SFC funded activity targets and fees (recruitment, credits, SAAS and fee income)

The RMAG also noted that the top-level risk register will be realigned to the new Strategic Framework 2022 for next academic session.

Business Continuity Exercise: Cyber-attack rehearsal

On the 4 May 2023 key college stakeholders participated in a cyber-attack scenario rehearsal facilitated by a Zurich Senior Risk Consultant.

This rehearsal highlighted the plans that the college has in place and walked all attendees through a phishing attack scenario from the immediate response, business

continuity actions and recovery steps. The exercise presentation provided by Zurich as part of the Business Continuity Exercise can be viewed [here](#).

Once the facilitator assessment of this rehearsal has been provided a copy will be provided to the Audit and Risk Assurance Committee.

Operational risk registers

Construction & Engineering – The faculty Assistant Principal advised the RMAG that the top risks for this faculty and mitigations include:

Top risk Increased demand in MA provision, with faculty not being in a position to deliver growth.

Mitigation: *Ongoing discussions with employers/agents and the development of a new delivery model.*

2nd risk Financial - direct income targets not being met following Voluntary Severance, and/or decreased MA numbers influencing direct income level.

Mitigation: *Ongoing work with Commercial team to evaluate and monitor situation. Shortfall in income could be mitigated with additional MA income.*

3rd risk Framework changes to MA/SVQ programs resulting in reduced credit value/fee change.

Mitigation: *Work being driven externally – internal working groups in place to monitor ongoing situation.*

Enterprise Knowledge & Exchange – The faculty Assistant Principal advised the RMAG that the top risks for this faculty and mitigations includes:

Top risk Personal safety of staff working in-country.

Mitigation: *Working group established to review gaps in process and develop response plans. Pre-travel processes (forms) now in place. Work underway with external partners to ensure that plans are fit for purpose.*

2nd risk Paper-based processes inhibit ability to achieve commercial targets.

Mitigation: *A College project is underway to digitise international applications as currently a paper-based process. LEAN programme to be launched to identify areas that could benefit from refinement of internal processes and/or digitisation options to be explored.*

3rd risk No suitable catering offer for international students/ groups.

Mitigation: *G&G contact confirmed; however, food offer still being negotiated (price-point). Discussions with procurement team to frame an acceptable offer is underway.*

4. IMPACT AND IMPLICATIONS

The development and management of the College's Risk Management Framework and Business Continuity Management Framework improves the College's capacity to:

- Identify, mitigate, and monitor college risks and possible major disruptions.
- Develop business continuity and recovery plans for major disruptions.
- Devise action plans to minimise high level adverse risk.
- Identify the colleges risk tolerance and risk appetite for each strategic aim.
- Improve academic and support services to deliver an excellent student experience.
- Address specific financial shortfalls to safeguard future financial sustainability.
- Invest in the workforce through an impactful people strategy.
- Maintain good College governance.

5. LINKS TO STRATEGIC PLAN AND KPIs

The successful management of the College's Risk Management Framework and Business Continuity Management Framework are central to good governance which enables the College to deliver its Strategic Aims and Key Performance Indicators.

TOP LEVEL RISK REGISTER

April 2023

Overview

The following have been identified as the top strategic risks of Edinburgh College for the reporting period starting April 2023. The colour status applied to each listed risk is based on the residual (Net) score applied within the top risk register maintained by the College.

RED Score

- ↔ (1) National bargaining impact on college operations
- ↔ (33) Financial Sustainability (Insufficient budget / funding to cover cost of living, job evaluation, employer pension contribution increases)
- ↔ (2) Student retention and attainment
- ↔ (24) Cyber security breaches within the college
- ↔ (32) Failure to meet SFC funded activity targets and fees (recruitment, credit, SAAS and fee income)

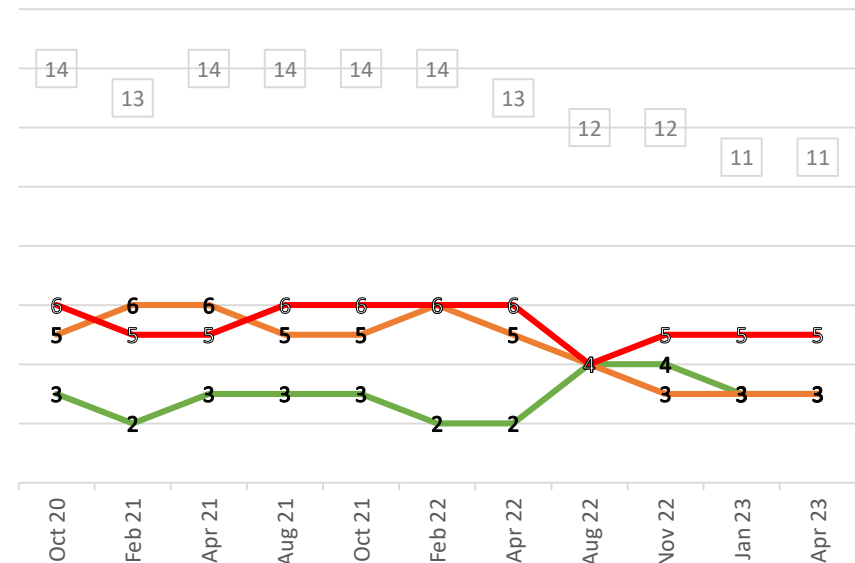
AMBER Score

- ↔ (3) Shortfall in commercial income
- ↔ (25) Finable breach of the GDPR or PECR
- ↔ (28) College estate infrastructure not aligned to meet business need

GREEN Score

- ↔ (35) Public health risk
- ↔ (27) Workforce planning and development
- ↔ (15) Health & safety non-compliance

Risk Movement



RAG Key

- ↔ No score movement from last reporting period
- ↑ Residual (Net) score increase from last reporting period. Colour of arrow denotes the risks previous RAG score
- ↓ Residual (Net) score decrease from last reporting period. Colour of arrow denotes the risks previous RAG score
- New Risk
- ⇅ Combination of previously separate risks within the top risk register

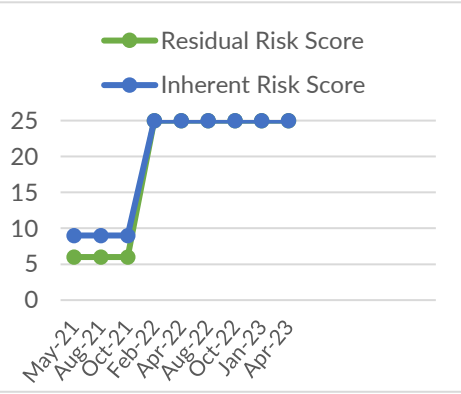
**EDINBURGH COLLEGE TOP LEVEL STRATEGIC RISK REGISTER
FOR REPORTING PERIOD UP TO APRIL 2023**

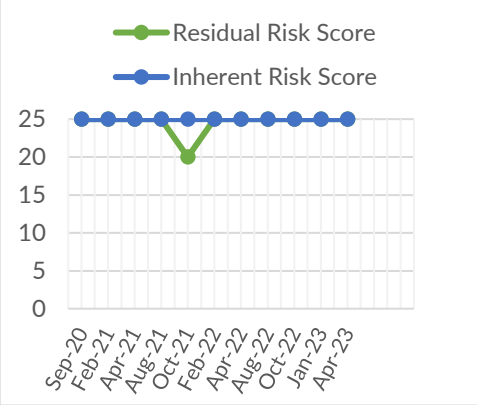
LEAD: Chief Operating Officer

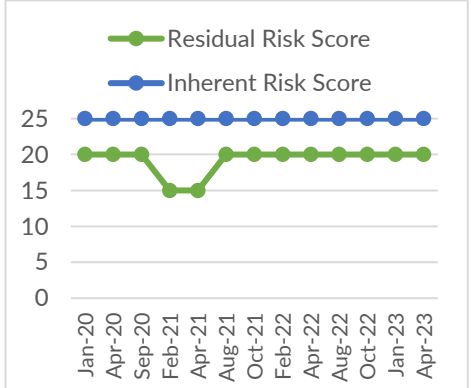
RESPONSIBLE: Head of Communication Policy and Research


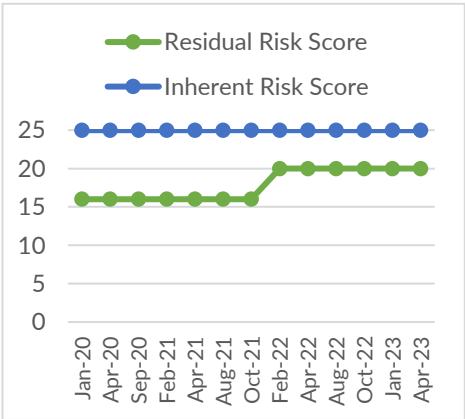
RAG KEY:

COLOUR KEY	DESCRIPTION
16 – 25 High Risk	At Risk or Late – Not Under Management Control – Action Required When Red , significant concerns over the adequacy/effectiveness of the controls in place and assurances obtained in proportion to the risk
11 – 15 Moderate Risk	At Risk or Late – Under Management Control When Amber , some areas of concern over the adequacy/effectiveness of the controls in place and assurances obtained in proportion to the risk
0 – 10 Low Risk	On Target and Under Management Control When Green , controls and assurances are adequate/effective in proportion to the risk
Yellow or Blank	Insufficient information at present to judge the adequacy/effectiveness of the controls and assurances

RISK DETAILS	RISK SCORING & TRACKING	RISK MITIGATIONS & CONTROLS	RISK MONITORING & ASSURANCE	CONTINGENCY IF RISK MITIGATIONS & CONTROLS FAIL	CHANGE LOG - FROM PREVIOUS REPORTING PERIOD																		
<p>(1) NATIONAL BARGAINING IMPACT ON COLLEGE OPERATIONS</p> <p>Management Lead: Director of HR & OD</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>5</td> <td style="background-color: red;">25</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>5</td> <td style="background-color: red;">25</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p> 	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	5	5	25	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Senior staff present on national work and bargaining groups to influence future direction <p>Remedial (Impact):</p> <ul style="list-style-type: none"> HR regularly review national circulars and determines national impact on college <p>Both:</p> <ul style="list-style-type: none"> Strong partnership working between management and unions 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Senior staff present on nation work and bargaining groups to influence future direction Regular internal HR/Executive meeting to review national initiatives and determine college actions Head attend ET meeting to update ET and to assess impact of national decisions on the college HR work with Heads to discuss impact in their areas General discussions with Finance regarding financial impacts Monthly meetings between COO and HRD <p>2nd line of defence:</p> <ul style="list-style-type: none"> Policy and Resources Committee discussions and reports Audit and Risk Assurance Committee review of top-level risk register – which includes industrial relations risk Executive Team and SMT meetings + reports – industrial relations matters <p>3rd line of defence:</p> <ul style="list-style-type: none"> Local Negotiation Committees – COO chairs LNC with Unison and Vice Principal with EIS (HRD attends both) - National issues are discussed with a view to determine college actions 	<ul style="list-style-type: none"> Focused management and oversight of situation by Executive, and senior management teams 	<p>2nd year pay deal has been tabled</p>
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<p>(33) FINANCIAL SUSTAINABILITY (INSUFFICIENT BUDGET / FUNDING TO COVER COST OF LIVING, JOB EVALUATION, EMPLOYER PENSION CONTRIBUTION INCREASES)</p> <p>Management Lead: Director of Finance</p> <p>Director of HR & OD</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1" data-bbox="335 153 780 409"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>5</td> <td>25</td> </tr> </tbody> </table> <table border="1" data-bbox="335 409 780 451"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>5</td> <td>25</td> </tr> </tbody> </table> <p data-bbox="489 378 742 409">Movement ⇄</p> 	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	5	5	25	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Active engagement at national level via Principal, COO and Director of HR / OD Develop a more unified response with other colleges through HR and Finance networks Improved involvement with the NJNC via Director of HR&OD Increase volume of lobbying with MSPs to promote needs of college Financial Forecasting and sensitivity analysis in place taking account of additional financial requirements and cost savings Together with other affected public sector organisations engage with bodies setting SPPA and LPF employer pension rates Better workforce planning to ensure that staffing costs are contained, Led by COO and SMT Efforts to reduce costs (through regular meetings with dept heads to review operational costs) and maximise commercial income through regular meetings between Director of Finance and Estates and Director of Commercial Development <p>Remedial (Impact):</p> <ul style="list-style-type: none"> 6% contribution (Middle Managers 3%) to Job Evaluation awarded from the SFC SFC have funded increase in employer lecturer pension costs SFC have provided a minimal increase for 2022/23 and therefore there will be a shortfall on funding for cost of living increases. We have been told to expect fat cash funding for future years. Additional VS scheme may go ahead in 2022/23 as an action to align budget and make savings for future years Ensure all costs associated with reduced income are removed where possible. Recruitment freeze may need to be actioned in 2022/23 SMT to develop a savings plan <p>Both:</p> <ul style="list-style-type: none"> Total impact fully disclosed to BoM Cost of Living increases included 2022/23 at an estimate of Public Sector Pay Policy. No agreement with Unions, consultation will be ongoing until agreed. Working with national employer's association to request additional Grant funding 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Ensure EC has the latest information available on future pension rate movements (review all published information) Annual budget setting with each AP/Director, included in operational plans Monthly management accounts meetings with each AP/Director Monthly meetings between COO and Director of Finance & Estates Infrastructure Annual assurance statements including financial control, references Maintaining up to date financial regulations as well as policies and procedures Annual Accounts scrutinised by the Executive Team. Regular Cash flow forecast prepared and reviewed SFC Cash flows prepared, reviewed, and sent monthly Regular joint reviews by Directors of HR/OD & Finance & Estates Infrastructure of budget aligned to establishment SMT meeting regularly <p>2nd line of defence:</p> <ul style="list-style-type: none"> Senior Management and Executive Team reviews of financial controls, cash management, management accounts and performance. Quarterly reports to Policy and Resources Committee and the Board. Budget and 5-year forecast process and papers to committees and board. Finance Report (including management accounts) reviewed by P&R Committee & Board. Regional Procurement Strategy approved by P&R Committee annually <p>3rd line of defence:</p> <ul style="list-style-type: none"> Full impact disclosed to BoM External Audit of finance including cash flow & management, payroll & expenses, purchasing & creditors and procurement as well as annual internal audit of EMA, bursaries and other student support funds Annual Accounts signed off by External auditors and laid before the Scottish Parliament. 	<ul style="list-style-type: none"> Seek further income from external revenue streams Impose a moratorium on expenditure Reduction in staff costs through restriction on filling vacancies. National lobby on ability to create further revenue for the college 	
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<p>(2) STUDENT RETENTION AND ATTAINMENT</p> <p>Management Lead: VP Innovation Planning & Performance</p> <p>VP Education & Skills</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1" data-bbox="338 289 777 541"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>5</td> <td>25</td> </tr> </tbody> </table> <table border="1" data-bbox="338 401 777 541"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>5</td> <td>20</td> </tr> </tbody> </table> <p data-bbox="492 510 744 541">Movement \longleftrightarrow</p> 	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	4	5	20	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> • New implemented curriculum management structure has re-designated 50 staff to management roles. This will create smaller curriculum teams and enable a greater focus on the quality of learning and teaching and help lead to improvements in both retention and attainment • MIS email staff proactively around student with cause for attendance concerns (targeting support before course starts) • Use of predictive analytics • Curriculum planning tool in use (Curriculum review) • Planning matrix including impacts and accountability • Introduce and adhere to curriculum planning cycle • Improved business intelligence (SFC/SDS/other data) • Improved course information and pre-course guidance • Continued use of application window • Continued training and joint working of curriculum and student support teams • Collegiate student focus / retention friendly timetabling • Ensuring all funding in place before start dates • Positive behaviour and anti-bullying and harassment policy and procedure in place • Counselling and wellbeing support in place (inc free sanitary products across all campuses) • Student communications to inform and build engaged student community • Career Coach in place and upgraded to latest version • Course remediation process in place for courses with low PI's to ensure course is still relevant to continue • Attendance and retention policy in use • Online withdrawals form replaced old paper-based withdrawals, which allows a more streamlined (monitored) process and more accurate withdrawal data within college • Single central record project (pro-monitor) • ROA Action plans outlined in Operational plans • New automation of pathways for progressing students (don't have to go through application process again) 	<p>1st line of defence:</p> <ul style="list-style-type: none"> • Student focused timetabling – RONSEAL group e.g., application process review • CM forum • Assessment board meetings • LDTs attend course teams meeting • Weekly AP meeting • EREP report discussed at SMT meetings (standing item on agenda) • HOF led performance reviews between HOF, CM, CL, Lecturers (in addition 3 x per year to Exec lead performance reviews with HOF and CM) using operational plan targets • Quality team meetings with CM's and CL's • Team meetings focused on self-evaluation • Annual ongoing curriculum review • Fortnightly ECSA meeting with AP QI <p>2nd line of defence:</p> <ul style="list-style-type: none"> • Regular reporting to Executive Team and Senior Management Team • Regular reporting to Academic Council • Deep Dives led by Audit and Risk Assurance Committee • ROA reporting to the Board of Management • Performance against ROA targets report to Academic Council • Student destination survey reports to Academic Council • ECSA reporting of student satisfaction to Academic council and Board of Management <p>3rd line of defence:</p> <ul style="list-style-type: none"> • Annual framework audit • ROA reporting to the SFC • Annual internal FES audit (also reported to Audit and Risk Assurance Committee) and FES submission to SFC • Close partnership with external partners and industry 	<ul style="list-style-type: none"> • Implement enhanced EREP (action plan) 	
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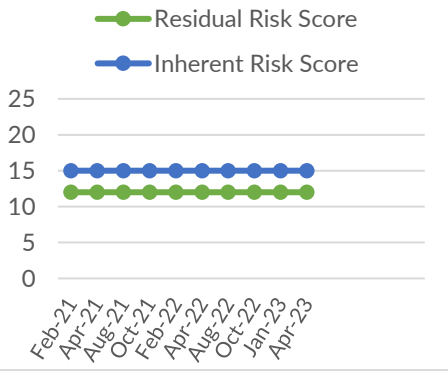
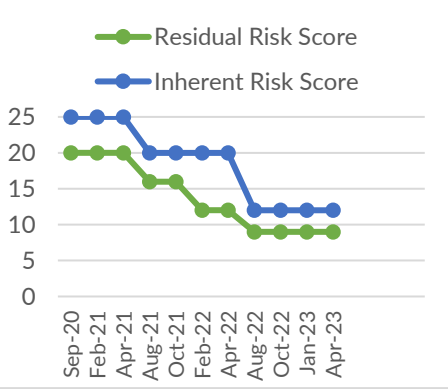
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		<ul style="list-style-type: none"> • Close working between CM's and SRA's (right student, right course) • Monitoring and tracking shared with Schools for SCP. Internal group supports younger students in partnership with local authority and SDS. • LEAN project to further refine application process <p>Remedial (Impact): NA</p> <p>Both:</p> <ul style="list-style-type: none"> • MIS control processes in place – more stringent control around marking of registers <p>Retention working group established and focused on specific areas e.g., full time FE containing national recognised qualifications</p>																					
<p>(24) CYBER SECURITY BREACHES WITHIN THE COLLEGE</p> <p>Management Lead: Chief Operating Officer</p> <p>Digital Infrastructure Service Lead</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>5</td> <td>25</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>5</td> <td>20</td> </tr> </tbody> </table> <p style="text-align: center;">Movement </p> 	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	4	5	20	<p>Preventative (Probability):</p> <p>Technical</p> <ul style="list-style-type: none"> • Overall secure configurations of college systems. • Software restrictions controlling which applications can be used on endpoints. • Vulnerability management and penetration testing e.g., application scanning. • Control of IT, MIS Development privileged accounts. • Patch management and data access control. • Boundary intrusion detection defences (firewalls), network inspection, activity, and event monitoring. • MIS application security improvement – ad hoc code reviews, Capita provide 6 monthly updates via web services <p>Organisational</p> <ul style="list-style-type: none"> • Information Security programme launched • UCSS InfoSec membership - Extra resource supplied by HEFESTIS CISO-Share. • Participation in CiSP/SCiNET. • Develop data breach response testing and business continuity readiness. Communication plans. • IT policies and IT asset registers <p>Behavioural</p> <ul style="list-style-type: none"> • Staff awareness training and being vigilant • Staff are content to report issues • Procurement policy and selection of suppliers <p>Remedial (Impact):</p> <ul style="list-style-type: none"> • Incident response planning • Data recovery systems prioritised (backups) and data recovery if breach occurs <p>Both:</p>	<p>1st line of defence:</p> <ul style="list-style-type: none"> • IT management team meetings which cover cyber security and internal controls related to preventative remedial actions • Information management meetings to establish data risk. • Policies and Procedures. <p>2nd line of defence:</p> <ul style="list-style-type: none"> • Audit and Risk Assurance Committee meetings + 'deep dives' to discuss cyber security and information management audit and compliance reports. <p>3rd line of defence:</p> <ul style="list-style-type: none"> • External and Internal audits on cyber security. • Internal audits on data protection. • Cyber Essentials Plus assessment process– College passed 2020. • CISO and DPO shared service in place to provide support. 	<ul style="list-style-type: none"> • Use of overtime budgets for out of hours cover. • Data/information insurance in place. • Escalation to SMT and Executive Team to approve budget for incident containment (e.g., external expertise). • Cyber Security Attack Business Continuity Management plan. • Security Operations Centre assistance available to contain incidents. 	<p>Comments from Digital infrastructure Lead:</p> <p>Stage one of the Network Access Control improvements (related to internal IT Services audit action 2) completed successfully in February.</p> <p>Wider MFA roll-out (related to internal Cyber Security audit action 1) planned for February 2023 has been delayed into March.</p> <p>The drafted IT/IS Change Control Policy (related to Cyber Security audit action 2) has been resubmitted for approval after a third round of feedback.</p>
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		<ul style="list-style-type: none"> Inventory of college systems maintained (dynamic asset management) and preventative controls Penetration testing undertaken annually Managed Security Operations Centre (SOC) 4th May 2023 – cyber attack rehearsal facilitated by Zurich representative was conducted with internal college stakeholders to step through plans in place and identify further actions. Critical system workshops being coordinated with key college stakeholders to develop robust BCM Plans: <ul style="list-style-type: none"> a. iTrent – workshops complete, finalising BCM plan b. Unit 4 - workshops complete, finalising BCM plan c. Unit e - workshops complete, finalising BCM plan d. Moodle/Mahara – workshops to be scheduled e. Promonitor – workshops to be scheduled f. Celcat - - workshops to be scheduled 																																																															
<p>(32) FAILURE TO MEET SFC FUNDED ACTIVITY TARGETS AND FEES (RECRUITMENT, CREDITS, SAAS AND FEE INCOME)</p> <p>Management Lead: VP Education & Skills</p> <p>VP Innovation Planning & Performance</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>5</td> <td>20</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>4</td> <td>16</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p> <table border="1"> <caption>Risk Score History</caption> <thead> <tr> <th>Period</th> <th>Inherent Risk Score</th> <th>Residual Risk Score</th> </tr> </thead> <tbody> <tr><td>Jan-20</td><td>20</td><td>10</td></tr> <tr><td>Apr-20</td><td>20</td><td>10</td></tr> <tr><td>Sep-20</td><td>20</td><td>10</td></tr> <tr><td>Feb-21</td><td>20</td><td>10</td></tr> <tr><td>Apr-21</td><td>20</td><td>12</td></tr> <tr><td>Aug-21</td><td>20</td><td>12</td></tr> <tr><td>Oct-21</td><td>20</td><td>12</td></tr> <tr><td>Feb-22</td><td>20</td><td>12</td></tr> <tr><td>Apr-22</td><td>20</td><td>12</td></tr> <tr><td>Aug-22</td><td>20</td><td>8</td></tr> <tr><td>Oct-22</td><td>20</td><td>10</td></tr> <tr><td>Jan-23</td><td>20</td><td>16</td></tr> <tr><td>Apr-23</td><td>20</td><td>16</td></tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	4	5	20	Residual (Net) Risk			Probability	Impact	Score	4	4	16	Period	Inherent Risk Score	Residual Risk Score	Jan-20	20	10	Apr-20	20	10	Sep-20	20	10	Feb-21	20	10	Apr-21	20	12	Aug-21	20	12	Oct-21	20	12	Feb-22	20	12	Apr-22	20	12	Aug-22	20	8	Oct-22	20	10	Jan-23	20	16	Apr-23	20	16	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Performance Monitoring cycle – encapsulating ROA targets Active engagement at national level via Principal and Chair Develop a more unified response with other colleges using College Scotland Increase volume of lobbying with MSPs to promote needs of college. Maintaining up to date financial regulations as well as policies and procedures. <p>Remedial (Impact):</p> <ul style="list-style-type: none"> More detailed budgeting and reporting now in place to align staff and overhead budgets to prioritised services Monthly focus on cost control with regular, clear communications with all staff on financial position seeking support in reconciling adverse position Financial systems, processes and procedures updated in areas where SFC guidance has had an effect, eg, budgeting and forecasting 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Heads of Faculty, VP, CM and CL (invited) conduct 6wkly performance to monitor targets Faculty Operational Plans include ROA and credit targets. Monthly meetings between COO and Head of Finance. Annual assurance statements including financial control, references. Regular meetings with regional outcome agreement manager Regular meetings with Education Scotland <p>2nd line of defence:</p> <ul style="list-style-type: none"> MIS quality checks on credit delivery. VP Education and Skills meetings with all Heads of Faculty to review ROA + credit delivery. Faculty Operational Plan performance meetings. VP Education and Skills reports to Policy and Resources Committee on credit delivery ROA and SFC target reporting presented to SMT and Academic Council Tri-partite engagement with SFC/Education Scotland 	<ul style="list-style-type: none"> Monitor effect of activity on funding and assess exposure Action planning and remedial quality assurance and enhancement 	<p>Have not recruited enough full-time students and semester 2 applications are lower than hope for</p>
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		<ul style="list-style-type: none"> Reconciliation of SFC guidance changes and allocation letters with monthly SFC Returns and Cash Flow Forecasts Wider acceptance of financial targets across the SMT, to ensure focus remains on achieving financial targets including alternative income streams if targets not forecast to be achieved Further guidance from SFC has provided more flexibility around the allocation of credits <p>Both:</p> <ul style="list-style-type: none"> Analysis of short-term contracts that lead to break-even/negative funding for the college Closer working between Finance/HR /Procurement and Department Heads including training sessions and regular meetings New self-evaluation procedures launched in June 2018, performance against attainment data as key ROA measure and supports staff to consider planning at operational level to improve this <p>Marketing targeted to demographics highlighted in ROA</p>	<ul style="list-style-type: none"> Monitoring by Education Scotland of progress against actions agreed in the Edinburgh College Enhancement Plan SFC guidance for the development of College Outcome Agreements 2018-19 to 2020-2021 to be implemented <p>3rd line of defence:</p> <ul style="list-style-type: none"> Annual internal FES audit (also reported to Audit and Risk Assurance Committee) and FES submission to SFC. Scottish Government CPA self-evaluation process. 																																																														
<p>(3) SHORTFALL IN COMMERCIAL INCOME</p> <p>Management Lead: VP Corporate Development</p> <p>Director of Enterprise and Knowledge Exchange</p> <p>Lead Committee: External Engagement/ Policy & Resources</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>5</td> <td>20</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>5</td> <td>15</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p> <table border="1"> <caption>Risk Score Data</caption> <thead> <tr> <th>Month</th> <th>Inherent Risk Score</th> <th>Residual Risk Score</th> </tr> </thead> <tbody> <tr><td>Jan-20</td><td>20</td><td>15</td></tr> <tr><td>Apr-20</td><td>20</td><td>25</td></tr> <tr><td>Sep-20</td><td>20</td><td>25</td></tr> <tr><td>Feb-21</td><td>20</td><td>25</td></tr> <tr><td>Apr-21</td><td>20</td><td>25</td></tr> <tr><td>Aug-21</td><td>20</td><td>15</td></tr> <tr><td>Oct-21</td><td>20</td><td>15</td></tr> <tr><td>Feb-22</td><td>20</td><td>20</td></tr> <tr><td>Apr-22</td><td>20</td><td>20</td></tr> <tr><td>Aug-22</td><td>20</td><td>15</td></tr> <tr><td>Oct-22</td><td>20</td><td>15</td></tr> <tr><td>Jan-23</td><td>20</td><td>15</td></tr> <tr><td>Apr-23</td><td>20</td><td>15</td></tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	4	5	20	Residual (Net) Risk			Probability	Impact	Score	3	5	15	Month	Inherent Risk Score	Residual Risk Score	Jan-20	20	15	Apr-20	20	25	Sep-20	20	25	Feb-21	20	25	Apr-21	20	25	Aug-21	20	15	Oct-21	20	15	Feb-22	20	20	Apr-22	20	20	Aug-22	20	15	Oct-22	20	15	Jan-23	20	15	Apr-23	20	15	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Robust sales model (people, product, and systems) in place to achieve income targets New products in development/research phase to anticipate and meet market demand Enhanced utilisation of business intelligence and sector networks to create new opportunities Communication and Marketing teams provide support to commercial team to promote services and partnerships for further income generation Joint ownership of target setting, review processes and increased income streams VP of Corporate Development and Head of Commercial Development roles charged with imprinting new commercial culture across relevant curriculum and support areas of college Better monthly forecast procedures incorporated which allow for higher degree of proactiveness <p>Remedial (Impact):</p> <ul style="list-style-type: none"> FWDF – The College’s ability to plan financially is not helped by the lack of information on funding and in-year allocation. The FWDF Year 6 allocation has yet to be announced. The later the announcement, the greater the likelihood of negative impact in terms of workload and pressure on the team. Director of Enterprise and Knowledge Exchange recently in post and has agreed to support a further review of all income streams, costing models and forecasting processes to improve transparency and create a forensic approach to income review 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Commercial income targets set annually as part of budget setting process Monthly reporting to Exec and SMT 6 weekly monitoring process to be put in place in line with updated reporting structure Quarterly reporting to Corporate Development Committee and BoM. <p>2nd line of defence:</p> <ul style="list-style-type: none"> Quarterly reporting of commercial income and forecast figures to Senior Management Team, Executive Team and Corporate Development committee Corporate Development Committee oversight of international contracts VP of Corporate Development leads working group set up to workshop ideas and push college to more agile/proactive with commercially driven opportunities <p>3rd line of defence:</p> <ul style="list-style-type: none"> Internal audit report on commercial activity. Scottish Government Procurement Capability Assessment self-evaluation process. 	<ul style="list-style-type: none"> Longer term forecast and targeted approach to setting commercial focus External training associate’s costs used to partly service income Actions to reduce costs associated with any reductions in Commercial Income A range of Program for Government funded recovery programmes are under design and we expect to be able to deliver some of these, which is an alternative source of income. These are being actively pursued. CRM live and ongoing use development Innovation funding alternative funding streams being pursued. Development of new Commercial strategy to ensure contingency plans in place to deal with risk occurrence. Associated UK/International/Apprentice action plans to be incorporated to ensure focus and achievement of targets to be introduced for 2022-2025. SFC review will impact on planning and budgeting for alternative funding activities. 	<ul style="list-style-type: none"> Facilities Hire and Club/Accommodation - limited numbers due to COVID restrictions Programme for gov funding has come in form of credits not revenue therefore will not assist with commercial income There seems to be some doubt cast on the guarantee of continued FWDF funding, this will become clearer as budget confirmed. Updated reporting structures in progress to capture all income for transparent monitoring.
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		<p>Both:</p> <ul style="list-style-type: none"> Partnerships with business, colleges and universities strengthened to build sustainable income platforms Diversified income streams to minimise reliance on any single source Flexible delivery model to ensure capacity (use of both in-house and external training associates) Costing review project which will highlight any contractual concerns – SLA review underway: Direct SDS contract and engine dept. other faculty to be completed end Oct/start Nov 2019. Deep dive session in new year with corporate development committee (BOM) to discuss SLA costing review New Business Development Strategy in process of being signed off. New Engagement Strategy in consultation process which will include focus Business Engagement plan to support Commercial growth ambitions. 																																																												
<p>(25) FINEABLE BREACH OF THE G.D.P.R OR P.E.C.R</p> <p>Management Lead: VP of Corporate Development</p> <p>Director of Communication Policy & Research</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>5</td> <td>20</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>4</td> <td>12</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p> <table border="1"> <caption>Risk Score History</caption> <thead> <tr> <th>Date</th> <th>Inherent Risk Score</th> <th>Residual Risk Score</th> </tr> </thead> <tbody> <tr><td>Apr-20</td><td>20</td><td>12</td></tr> <tr><td>Sep-20</td><td>20</td><td>12</td></tr> <tr><td>Feb-21</td><td>20</td><td>12</td></tr> <tr><td>Apr-21</td><td>20</td><td>12</td></tr> <tr><td>Aug-21</td><td>20</td><td>12</td></tr> <tr><td>Oct-21</td><td>20</td><td>12</td></tr> <tr><td>Feb-22</td><td>20</td><td>12</td></tr> <tr><td>Apr-22</td><td>20</td><td>12</td></tr> <tr><td>Aug-22</td><td>20</td><td>12</td></tr> <tr><td>Oct-22</td><td>20</td><td>12</td></tr> <tr><td>Jan-23</td><td>20</td><td>12</td></tr> <tr><td>Apr-23</td><td>20</td><td>12</td></tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	4	5	20	Residual (Net) Risk			Probability	Impact	Score	3	4	12	Date	Inherent Risk Score	Residual Risk Score	Apr-20	20	12	Sep-20	20	12	Feb-21	20	12	Apr-21	20	12	Aug-21	20	12	Oct-21	20	12	Feb-22	20	12	Apr-22	20	12	Aug-22	20	12	Oct-22	20	12	Jan-23	20	12	Apr-23	20	12	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Data Protection Handbook published college-wide February 2021 containing guidance on data sharing, verifying ID, secure send via email, & referral of legal data protection requests to DP Team. EC laptop encryption complete on all known devices. Data Protection Policy co-designed with DPO; published on internet, intranet and embedded in mandatory staff data protection training. Mandatory staff GDPR training on Moodle Staff zone 'Tech Tuesdays' Cyber Security essentials training modules issued to all staff each Tuesday to improve cyber security awareness. Full information asset audit completed January 2020 – SMT assigned ownership of EC Info Assets & providing security classifications Nov 2020 onwards. DPO delivered data protection impact assessment training to middle managers (via OD) three times – now a mandatory training session. Dedicated data protection inbox created for staff - single point of reporting/email address for data protection issues. 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Dedicated Information Management manager in post to monitor compliance Information Governance Group established: DPO and CISO are members. OD monthly reports to managers on GDPR training uptake Co-Sharing of common documentation by Scottish College through SCIGG <p>2nd line of defence:</p> <ul style="list-style-type: none"> Data Protection Officer in post via HEFESTIS Shared Service: reviewing and actively contributing to college GDPR work and provides independent internal audit and advisory role GDPR update to SMT on by-request basis <p>3rd line of defence:</p> <ul style="list-style-type: none"> Internal audit on GDPR compliance (BDO) 	<p>Breach escalation to Director of Communication Policy and Research for assessment and determination of further escalation to Executive team for strategic level oversight</p>	<p>Risk score reviewed by information manager and confirmed to be accurate</p> <p>Reference added to all-staff Tech Tuesday's cyber security training modules.</p> <p>Mandatory staff GDPR training on Moodle Staff zone (81% as at Jan 2023)</p> <p>Implementing automated reminders from iTrent when courses are due to expire</p>
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		<ul style="list-style-type: none"> All BDO GDPR audit actions closed October 2021. College has embedded GDPR-standard student privacy notices; and PECR-standard direct marketing consents, within application & enrolment process. College has deployed employee, and job applicant, privacy notices on college website privacy page. Data capture on website is compliant Participation within FE GDPR collaborative group (SCIGG) to share college sector approaches to GDPR compliance: College website cookie permissions updated to GDPR and E-Privacy Regulation compliant standard Updated staff contracts issued August 2018 containing DPO-approved GDPR/data protection clauses. Contracted/part-time workers provided statutory compliance information booklet, which includes key data protection instructions/guidance <p>Remedial (Impact):</p> <ul style="list-style-type: none"> Single point of reporting/email address for data protection and data breach issues: weekend out-of-hours breach reporting cover provided by Information Manager. Data Protection Officer support available out of hours via HEFESTIS shared DPO service <p>Both:</p> <ul style="list-style-type: none"> Integrated Action Plan encompassing outstanding data protection, information security and records management compliance requirements developed and being monitored by EC Information Governance Group (IGG). Data Sharing Agreements being developed with key external partners to reduce likelihood of breach and to reduce fines in event of breach involving 3rd parties Formal Data Breach Reporting Procedure approved by SMT and issued to staff via College Update/available on college website privacy page. 																								
<p>(28) COLLEGE ESTATE INFRASTRUCTURE NOT ALIGNED TO MEET BUSINESS NEED</p> <p>Management Lead: Estates Managers</p> <p>Lead Committee:</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>5</td> <td>15</td> </tr> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> <tr> <td>3</td> <td>4</td> <td>12</td> </tr> <tr> <th colspan="2">Movement</th> <td>↔</td> </tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	3	5	15	Residual (Net) Risk			Probability	Impact	Score	3	4	12	Movement		↔	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Planned maintenance programme in place for statutory compliance Curriculum review to take account of Estates requirements and lack of funding to make significant changes Future planning for Motor Vehicle facilities at Sighthill/Midlothian; and Construction facilities to replace Forthside 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Critical works register in place to monitor outstanding works and monthly maintenance register to monitor works progress against budget availability KPI's in operational plans for Estates Staff roles designed to manage Estate's compliance Estate's strategy and capital funding allocation prioritised and agreed by the SMT 	<ul style="list-style-type: none"> Align decisions on future curriculum to enable estates to review requirements and plan for necessary changes as part of the connect groups Estate's incident management process and business continuity plans G&G contract now reduced to minimal service 	
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<p>Policy and Resources Committee</p>		<ul style="list-style-type: none"> Major project underway for relocations of all Forthside facilities to college campuses. <p>Remedial (Impact):</p> <ul style="list-style-type: none"> In-house maintenance team carry out reactive maintenance where possible. Register in place to monitor works and log what works are not completed and prioritised Loss of catering provision to staff and students with long lead time if retender required <p>Both:</p> <ul style="list-style-type: none"> BTP Estates Review completed – focus on Forthside construction and Sighthill Automotive. Flexible approach being taken to reconfiguring classrooms where budget permits 	<ul style="list-style-type: none"> Estate’s condition reviewed six monthly + monthly review of estates critical works register Estates Services Manager’s and H&S Manager meet weekly with Dir. of Finance and Estates Infrastructure, H&S + Sustainability + Facilities + Security + Porterage + Print Services + Vehicles + IFM + Catering Contract + Budget issues discussed ISS contract management meetings G+G monthly contract meetings for catering contract with Finance and Procurement Monthly utility monitoring <p>2nd line of defence:</p> <ul style="list-style-type: none"> SMT + Executive Team discussions on estates. Policy and Resources Committee papers and discussions on estates matters. Estates management matters are also included also in the Health and Safety Report to Health and Safety Committee. <p>3rd line of defence:</p> <ul style="list-style-type: none"> NQA Auditor process. Internal audit on estates management. Care Inspectorate inspections of the nursery. 																				
<p>(35) PUBLIC HEALTH RISKS</p> <p>Management Lead: H&S Manager</p> <p>Director of Communication Policy & Research</p> <p>Lead Committee: External Engagement/ Policy & Resources</p>	<table border="1" data-bbox="338 1142 780 1423"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>4</td> <td>16</td> </tr> </tbody> </table> <table border="1" data-bbox="338 1262 780 1423"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>3</td> <td>9</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p> 	Inherent (Gross) Risk			Probability	Impact	Score	4	4	16	Residual (Net) Risk			Probability	Impact	Score	3	3	9	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Health and safety along with public health colleagues will continue to monitor risk: Monkey pox, meningitis, COVID-19, flu, Noro virus, etc Occupational health nurse working closely with ECSA on public health campaigns Hand hygiene, CO2 monitoring and ventilation procedures in place <p>Remedial (Impact):</p> <ul style="list-style-type: none"> Alternative working arrangements in place for staff when required Blended learning default position for classes when required College and ECSA maintain engagement with students via various digital and social media platforms and to provide information about keeping well and safe. <p>Both:</p> <ul style="list-style-type: none"> Staff communications to provide updates on situation and risk levels – Staff update email, intranet, website, etc 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Risk Management and Assurance Group monitor risk and overall college response actions Critical Incident Team to manage major events <p>2nd line of defence:</p> <ul style="list-style-type: none"> Health and Safety committee Regular Public health team briefs SMT fortnightly meetings <p>3rd line of defence:</p> <ul style="list-style-type: none"> Scottish Government Health Protection Scotland Internal and external audits Trade union feedback 	<ul style="list-style-type: none"> BCM plans and procedures/guidance for communicable diseases Full campus closure – all activity on-line College has regular contact with public health to manage any potential outbreak in student population 	
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<p>(27) WORKFORCE PLANNING AND DEVELOPMENT</p> <p>Management Lead: Director of HR & OD (HRD)</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>4</td> <td>12</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>3</td> <td>9</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p>	Inherent (Gross) Risk			Probability	Impact	Score	3	4	12	Residual (Net) Risk			Probability	Impact	Score	3	3	9	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Workforce development plan now active Monthly meetings with managers by HR Partners to review key employee management information including retirements, vacancies, turnover, absence (16) <p>Remedial (Impact):</p> <p>Both:</p> <ul style="list-style-type: none"> Greater scrutiny of vacancy control and staff deployment has been implemented Robust process and procedures in place to track vacancies against budget 	<p>1st line of defence:</p> <ul style="list-style-type: none"> Staff analytics monthly reports to Heads of School and Support Managers Management of establishment against budget Regular reviews of progress against operational plan objectives for OD team with HRD. Monthly meeting between HR advisors and Middle managers (curriculum and support staff) to review establishment vacancy, workforce planning, staff wellbeing and OD Joint LNC meetings to develop employment policies <p>2nd line of defence:</p> <ul style="list-style-type: none"> Regular reviews with progress and issues in HR & OD between COO and HRD. SMT and Executive Team discussions and reports on workforce planning, OD, and staff wellbeing. HR reports to Policy and Resources Committee and SMT on workforce planning. <p>3rd line of defence:</p> <ul style="list-style-type: none"> Internal audit: Workforce & Establishment Management was carried out in 2022 and some actions for improvement were noted. 	<ul style="list-style-type: none"> Consider development of policy on retraining displaced staff rather than recruiting new staff Consider alternative employment models where feasible – ongoing 	<p>WF Plan being updated to take account of £3.6m-£5.7m savings to be made currently under review by COO and Exec as part of EC People launch</p> <p>Draft people strategy being reviewed in line with new College Strategic Aims and launch of EC People campaign</p>
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<p>(15) HEALTH & SAFETY NON-COMPLIANCE</p> <p>Management Lead: Chief Operating Officer</p> <p>H&S Manager</p> <p>Lead Committee: Policy and Resources Committee</p>	<table border="1"> <thead> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>4</td> <td>12</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <th>Probability</th> <th>Impact</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>4</td> <td>8</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ⇄</p>	Inherent (Gross) Risk			Probability	Impact	Score	3	4	12	Residual (Net) Risk			Probability	Impact	Score	2	4	8	<p>Preventative (Probability):</p> <ul style="list-style-type: none"> Corporate policies and procedures in place. Document control tracker maintained Mandatory training requirements in place for all staff Communications support to ensure staff understand compliance responsibilities H&S documentation to be implemented and maintained by Faculty/Function heads or nominated managers <p>Remedial (Impact):</p> <ul style="list-style-type: none"> Early detection of risk/s and resolve quickly and efficiently. <p>Both:</p>	<p>1st line of defence:</p> <ul style="list-style-type: none"> Reactive date (e.g., accident/incident reports) monitored to identify and correct procedural deficiencies Operational planning Annual review of H&S policy; maximum review timeframe for procedures is 3 years All new or significantly altered policies and procedures sent for consultation (H&S Committee, management, relevant staff) and all feedback recorded H&S Committee in place with engagement of staff and unions <p>2nd line of defence:</p> <ul style="list-style-type: none"> Ongoing monitoring of budget availability to carry out reactive work with H&S implications and reporting to SMT/Executive <p>3rd line of defence:</p> <ul style="list-style-type: none"> Programme of internal and external audits in place 	<ul style="list-style-type: none"> Enforcement of H&S management systems and procedures for area/department. Immediate implementation of any required local or organisation-wide deviation from procedure as short-term control Formal review and consultation on need for procedural change/update. Dependent on outcome, implement corrective actions 	
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Business Continuity Management Plan – Adverse Weather

The following information details the actions that should be taken to respond to the loss of and recovery of the prescribed business function

Plan owner: Chief Operating Officer

Plan scope:

- Corporate level plan (whole college)
- Operational level plan (key business area)

Initial incident response information:

Duty Security to carry out assessment of conditions at campus around 7am in-line with Met office and Council weather warnings. If Security unable to travel to campus, they must contact Estates Services/s ASAP to advise.

- <https://www.edinburgh.gov.uk/severe-weather>
- <https://www.metoffice.gov.uk/Mobile security to review conditions of routes between campuses during patrols.>

From information received from Security, if campus conditions are poor/not accessible the Estates Services Manager's will contact Executive team as per the Critical Incident Management Policy and Procedure to advise that campus should be closed.

Actions	Responsible
A. ESTATES & HEALTH AND SAFETY	
1. Security team to assess conditions of campus throughout the day and to keep Estates Services Managers informed. <ul style="list-style-type: none"> a) routes to assembly areas and all final escape doors to be cleared of snow and checked that they can open fully before the building is occupied b) all access routes to be gritted if icy conditions c) dynamic risk assessment to be carried out on: weight loading of snow, unsecured items during high winds, drying of internal floors when wet to prevent slips and outdoor activities 	Estates Services Manager/s Security Team

2. Notify ISS of closure period - ISS on call engineer available 24/7	Estates Services Manager/s
3. Alarm company to be notified and if possible, monitor intruder and fire alarms 24/7 and notify Estate's managers and Security staff of any issues	Estates Services Manager/s
4. Evening/Night security to change from onsite guarding to key holder response (ISS) Site dependant	Estates Services Manager/s ISS Soft Services Manager
5. Implement Estates Operational BCM plan for campus estates and utilities during closure and contact dependent agencies: a) waste collection and disposal b) drainage/sewerage, electricity, gas, and water core services c) delivery services and suppliers	Estates Services Manager/s
6. If closure exceeds two weeks and CIM Team has agreed that no site/campus access is possible/allowed: a) review heating and agree if it will be turned off b) legionella flushing to be carried out c) agree if club pool should be drained with Club manager	Estates Services Manager/s
7. Should damage to college estates occur: a) make all necessary safety measures to ensure there is no threat of harm to persons still on site b) make all necessary arrangements to minimise further damage from occurring c) contact College insurer to advise of situation – insurer may send loss adjuster to assess damage once site is safe to attend. Asset lists may be needed for insurance.	Estates Services Manager/s Health and Safety Manager
B. COMMUNICATIONS	
1. Agree messaging and method of communications from the below: a) email templates that can be used for students, staff and stakeholders b) direct txt messages (check/update TxtTools database) c) call staff and students directly d) update main college phonenumber switchboard with messaging	CIM Team a) Comms team b) HR, Student Records, & Comms team c) SMT & Managers d) IT & Comms team

<p>2. Deploy wider college comms regarding site/campus closure including continuity of teaching/learning & working arrangements, (if possible) approx. timeframes for site/campus closure, etc:</p> <ul style="list-style-type: none"> a) Update website b) Update social media channels c) Send All Staff email d) Send All Student email e) Media messaging (if agreed required) 	<p>Communications Manager</p>
<p>3. Contact CMs and support managers to advise of adverse weather conditions and provide instructions as outlined in section G and H</p>	<p>SMT</p>
<p>4. Contact Room Bookings staff to advise of campus closure and to (if possible and requested) find alternative room arrangements for classes.</p> <p>(If necessary) Reference MOU agreement if alternative learning/teaching location can be utilised</p>	<p>CIM Team</p>
<p>C. CLUB & HALLS OF RESIDENCE (GRANTON & MILTON)</p>	
<p>1. Liaise with Milton Halls/Club Manager and Granton Halls Manager to implement BCM plan for Halls of Residence and Club</p>	<p>Milton/Granton - Estates Services Manager</p>
<p>2. Contact all Halls and Club staff to advise of adverse weather conditions and provide instructions</p> <p>Note: these instructions may differ from overall instructions delivered through college communications</p>	<p>Milton Halls/Club Manager Granton Halls Manager</p>
<p>3. Club manager to put in place Adverse Weather Communications Plan:</p> <ul style="list-style-type: none"> a) Contact Club members b) Update Club bookings system, Facebook and other social media platforms controlled by the Club c) Contact suppliers to advise of situation and if necessary, make alternative arrangements 	<p>Milton Halls/Club Manager</p>
<p>4. Contact halls suppliers to advise of situation and if necessary, make alternative arrangements</p>	<p>Milton Halls/Club Manager Granton Halls Manager</p>
<p>5. If some staff or students are on site and cannot leave due to the weather, Heads of School will need to make arrangements to keep them on site and explore availability of temporary accommodation should there be a requirement for overnight stay with Halls Managers in the first instance</p>	<p>School Heads Milton Halls/Club Manager</p>

	Granton Halls Manager
D. RESTAURANTS AND HAIR & BEAUTY SALONS	
1. Put in place Adverse Weather Communications Plan: a) Contact bookings to advise of closure and cancel/reschedule b) Update Facebook and other social media platforms controlled by Restaurants/Salons	School Heads
2. Contact suppliers to advise of closure and where possible make alternative arrangements / reschedule	School Heads
E. NURSERY (Granton Campus)	
1. Liaise with Nursery Manager to advise of campus closure	Director of Communication, Policy and Research Estates Services Manager/s
2. Contact all nursery staff to advise of adverse weather conditions and provide instructions Note: these instructions may differ from overall instructions delivered through College communications	Nursery Manager
3. Contact parents/guardians to advise of adverse weather conditions and instructions	Nursery Manager
F. COFFEE SHOPS	
1. Liaise with G&G Catering Manager to advise of campus closure	Estates Services Manager/s
G. CURRICULUM	
1. (During L&T open hours) Contact contract bus to advise of early campus closing and agree an earlier pick up for students. (Opito students only)	School Heads
2. Advise all curriculum staff to contact students and implement remote working procedures and/or liaise with Room Bookings team to find alternative working arrangements during campus closure	School Heads
3. (During or nearing exam time) Inform SQA Liaison Manager of site closure and next steps. Note: The SQA has measures in place to support candidates and centres in the event of a critical incident occurring just before or very close to an exam: in previous years, the Exceptional Circumstances	CIM Team SQA Liaison Manager

<p>Consideration Service* has been applicable in situations where candidates have been prevented from sitting an exam(s) in their presenting centre.</p> <p>*2023 Exceptional Circumstances Consideration Service is still being developed. The Guide for SQA Coordinators 2022-23 will be updated when this information is available.</p>	
<p>4. (During or nearing exam time) If “Best grade” is agreed with SQA inform curriculum staff to start predictive grading of students</p>	SMT (Curriculum)
<p>H. SUPPORT STAFF</p>	
<p>1. Middle Managers to contact staff to discuss remote working procedures and/or alternative working arrangements during campus closure</p>	Middle Managers
<p>I. EXTERNAL STAKEHOLDERS</p>	
<p>1. Contact key external stakeholders that have been identified via the relevant area’s Business Impact Assessment of College closure</p> <p>Note: Contact details of external stakeholders are held by the relevant area</p>	<p>SMT</p> <p>Middle Managers</p> <p>School Heads</p>
<p>J. BACS PAYMENTS/COLLECTIONS</p>	
<p>1. Make sure that staff required to provide information for BACS payments/collections and those that are required to approve payments have access to systems offsite.</p> <p>This includes:</p> <p>a) Student Experience for student funding payments</p> <p>b) The Club for Club Direct Debit collections</p> <p>Finance for payroll, supplier payments, and tuition fee direct debit collections. These are all payments/collections required to be made on specific dates which will be affected by any campus closures.</p>	Middle managers

Appendix 1 - Critical Incident Management Team Membership and Roles

Gold	Silver	Bronze	Partnership agency leads
<ul style="list-style-type: none"> ▪ Chief Operating Officer 	<ul style="list-style-type: none"> ▪ Sighthill / Midlothian Estates Services Manager 	<ul style="list-style-type: none"> ▪ Milton Halls/Club Manager ▪ Granton Halls Manager 	<ul style="list-style-type: none"> ▪ Contract bus service (OPITO students) ▪ Insurer – Zurich

	<ul style="list-style-type: none"> ▪ Granton / Milton Estates Services Manager ▪ Health and Safety Manager 	<ul style="list-style-type: none"> ▪ Communications Manager ▪ BCP Plan, Event & Action log – Portfolio Manager ▪ Staff co-ordination - SMT 	
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Appendix 2 - Strategic intent statement

1. To protect the health, wellbeing and safety of our students, staff, customers, and College visitors
2. Coordinate any messages the College is releasing to students, staff, and other stakeholders
3. To ensure continuation of learning, teaching and assessment for our students so that disruption to their student experience is minimised
4. To ensure the security and wellbeing of College buildings and estates

Title	Data Breach Incident and Cyber Attack Update - May 2023
Appendices	None
Disclosable under FOISA	Yes
Primary Contact	Nick Croft, Director of Communication, Policy & Research
Date of Production	02.05.23
Action Required	Information

1. RECOMMENDATIONS

The Audit & Risk Assurance Committee are asked to note the update provided.

2. PURPOSE OF REPORT

This report provides a summary of *reportable* data breach incidents within Edinburgh College for the reporting period from 1 February 2023 to 30 April 2023 (Quarter 3).

3. INCIDENTS

There were no reportable data breach incidents in this reporting period (reportable data breach incidents being defined as personal data breaches of sufficient seriousness to require notification of the Information Commissioner's Office).

4. IMPACT AND IMPLICATIONS

To monitor any trends that may occur and assess (where possible) areas of potential risk. Further to this, the report for remedial actions to be implemented to ensure the college meets legal compliance.

Monitoring and carrying out investigations ensures that the college is operating in compliance with data protection legislation.

5. LINKS TO STRATEGIC PLAN AND KPIS

The activities and key priorities described in this report are linked to the strategic aim to be 'An Effective and Efficient College'.