



For the future you want

AUDIT & RISK ASSURANCE COMMITTEE

AGENDA

A meeting of the Audit & Risk Assurance Committee will be held at 15:00 hours on Tuesday 22 February 2023 via Microsoft Teams.

		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		
	• Policy & Resources Committee	Chair	Verbal
5	INTERNAL AUDIT REPORTS		
5.1	Summary of Audit Recommendations Report	A Williamson	C
5.2	Internal Audit Report: Freedom of Information	BDO	D
5.3	Internal Audit Report: Staff Wellbeing	BDO	E
6	RISK ASSURANCE		
6.1	Risk Management Report	N Croft	F
6.2	Data Breach Incidents and Cyber Attacks Update	N Croft	G
6.3	Deep Dive: Penetration Test Report	A Williamson	Pres.
6.4	Cyber Security Risk Control Matrix Report	A Williamson	H
7	ANY OTHER COMPETENT BUSINESS		
8	FOR INFORMATION		
8.1	Internal Audit Progress Report		I
8.2	Audit & Risk Assurance Committee Business Planner 2023/24		J
9	DATE OF NEXT MEETING: 24 May 2023		

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.

AUDIT & RISK ASSURANCE COMMITTEE
22 FEBRUARY 2023
PAPER F

Title	Risk Management Update
Appendices	Appendix 1: Top level Risk Register Infographic Jan 2023 Appendix 2: Top Level Risk Register Jan 2023 Appendix 3: Critical Incident Management Policy and Procedure Appendix 4: Business Continuity Management Plan – Loss of site Appendix 5: Business Continuity Management Plan – Loss of utility
Disclosable under FOISA	No.
Primary Contact	Nick Croft, Director of Communications, Policy & Research
Date of Production	23/01/2023
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:

- Critical Incident Management Policy and Procedure (Appendix 3)
- Business Continuity Management Plan – Loss of site (Appendix 4)
- Business Continuity Management Plan – Loss of utility (Appendix 5)

Please note, the changes agreed by the RMAG have been tracked/marked-up in these documents.

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 19th January 2023, the RMAG discussed the following:

Top Risk Register

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 agreed that due lower than planned full-time student recruitment in semester 2, risk 32 - Failure to meet SFC funded activity targets and fees (recruitment, credits, SAAS and fee income) should be increased from an 'amber' to a 'red' score, thereby moving this risk into the high-risk category and potential for financial clawback.

Operational risk registers

Creative Industries – The faculty Assistant Principal advised the RMAG that the top risks for this faculty and mitigations include:

- Top risk** Degree partnerships discontinuing accreditation.
Mitigation would require finding a new University to deliver the degree courses and/or seek own College degree awarding power.
- 2nd risk** Failure in the management of performance spaces/venues & equipment (which would limit the ability to provide full course programmes).
Mitigation would require finding alternative venues in suitable locations within the region.

Health Wellbeing and Social Science – The faculty Assistant Principal advised the RMAG that the top risks for this faculty and mitigations includes:

- Top risk** A demographic shift in the student population.
Mitigation requires continual to use self-evaluation process to ensure course offering/level meets demand and regional need to keep attracting sufficient student numbers onto courses.
- 2nd risk** Problems encountered when implementing a new curriculum structure.
Mitigation requires ensuring that training needs are identified, and relevant training is provided accordingly as well as normal support to staff.

Student Experience – The department Assistant Principal advised the RMAG that the top risks for this department and mitigations includes:

- Top risk** Insufficient student funding available
Mitigation requires putting a special case forward to the SFC for additional funding, but student payments continue to be managed within budget pending the response from the SFC.
- 2nd risk** Safeguarding measures insufficient to meet need.
Mitigation requires ensuring that high level training is refreshed as required for all safeguarding leads, safeguarding reporting system in place, and partnership working with nearby councils to fill any known gaps.
- 3rd risk** Increase in mental health disclosure and support requirements.
Mitigation requires increasing partnership arrangements with the NHS and community mental health services and increase partnership working with mental health community services.

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

January 2023



Overview

The following have been identified as the top strategic risks of Edinburgh College for the reporting period starting January 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)

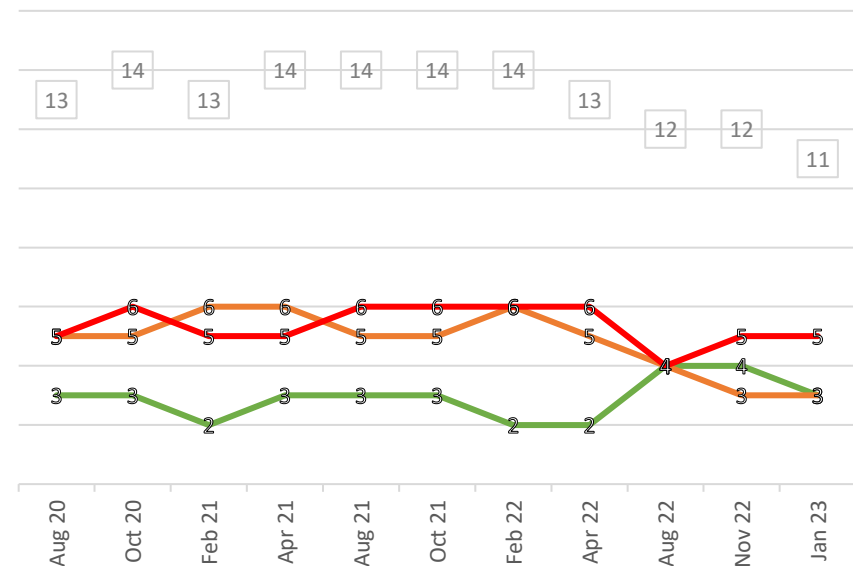
AMBER Score

- ↔ (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 JANUARY 2023**



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LEAD: Chief Operating Officer

RESPONSIBLE: Head of Communication Policy and Research

RAG KEY:

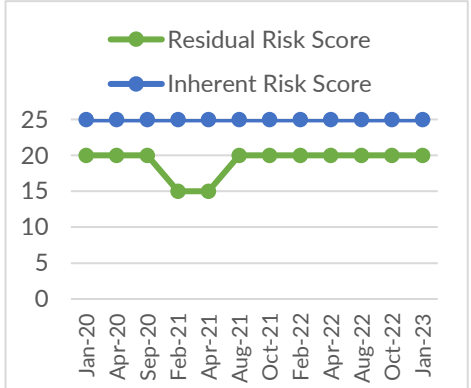
COLOUR KEY	DESCRIPTION
16 – 25 High Risk	At Risk or Late – Not Under Management Control – Action Required When Red , significant concerns over the adequacy/effectiveness of the controls in place and assurances obtained in proportion to the risk
11 – 15 Moderate Risk	At Risk or Late – Under Management 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

APPETITE KEY:


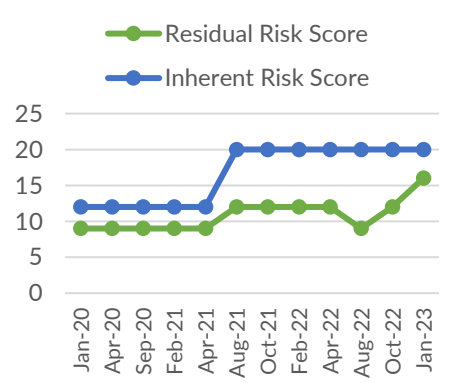
COLLEGE STRATEGIC AIMS	LOW										MODERATE					HIGH									
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
1. Delivering a Superb Student Experience											<				>										
2. Providing an Excellent Curriculum												<					>								
3. Supporting and Inspiring our People					<										>										
4. Valued in Partnership and by Communities													<								>				
5. An Effective and Efficient College								<							>										

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> <p>Aligned to Strategic Aim: Supporting and inspiring our staff</p> <p>An effective and efficient college</p>	<table border="1"> <tr> <th colspan="3">Inherent (Gross) Risk</th> </tr> <tr> <td><i>Probability</i></td> <td><i>Impact</i></td> <td><i>Score</i></td> </tr> <tr> <td>5</td> <td>5</td> <td style="background-color: red; color: white;">25</td> </tr> <tr> <th colspan="3">Residual (Net) Risk</th> </tr> <tr> <td><i>Probability</i></td> <td><i>Impact</i></td> <td><i>Score</i></td> </tr> <tr> <td>5</td> <td>5</td> <td style="background-color: red; color: white;">25</td> </tr> <tr> <td colspan="2">Movement</td> <td>↔</td> </tr> </table>	Inherent (Gross) Risk			<i>Probability</i>	<i>Impact</i>	<i>Score</i>	5	5	25	Residual (Net) Risk			<i>Probability</i>	<i>Impact</i>	<i>Score</i>	5	5	25	Movement		↔	<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"> Focused management and oversight of situation by Executive, and senior management teams 	
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			<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 																																																					
<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> <p>Aligned to Strategic Aim: Supporting and inspiring our staff</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>5</td> <td>5</td> <td>25</td> </tr> </tbody> </table> <p style="text-align: center;">Movement ↔</p> <table border="1"> <caption>Risk Score Movement Data</caption> <thead> <tr> <th>Month</th> <th>Inherent Risk Score</th> <th>Residual Risk Score</th> </tr> </thead> <tbody> <tr><td>Sep-20</td><td>25</td><td>25</td></tr> <tr><td>Feb-21</td><td>25</td><td>25</td></tr> <tr><td>Apr-21</td><td>25</td><td>25</td></tr> <tr><td>Aug-21</td><td>25</td><td>25</td></tr> <tr><td>Oct-21</td><td>25</td><td>20</td></tr> <tr><td>Feb-22</td><td>25</td><td>25</td></tr> <tr><td>Apr-22</td><td>25</td><td>25</td></tr> <tr><td>Aug-22</td><td>25</td><td>25</td></tr> <tr><td>Oct-22</td><td>25</td><td>25</td></tr> <tr><td>Jan-23</td><td>25</td><td>25</td></tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	5	5	25	Month	Inherent Risk Score	Residual Risk Score	Sep-20	25	25	Feb-21	25	25	Apr-21	25	25	Aug-21	25	25	Oct-21	25	20	Feb-22	25	25	Apr-22	25	25	Aug-22	25	25	Oct-22	25	25	Jan-23	25	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 ongoing – regular meetings with dept heads to review operational costs <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> <p>Aligned to Strategic Aim: Delivering a superb student experience</p> <p>An effective and efficient college Providing an excellent curriculum</p>	<table border="1" data-bbox="338 296 777 548"> <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="338 548 777 751"> <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> <tr> <td colspan="2">Movement</td> <td>↔</td> </tr> </tbody> </table> 	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	4	5	20	Movement		↔	<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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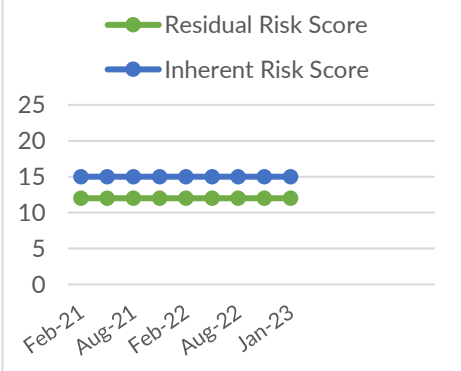
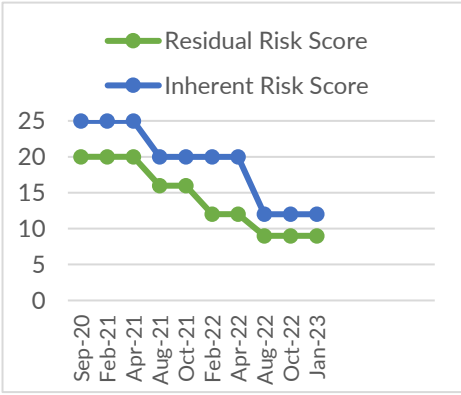
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		<ul style="list-style-type: none"> Close working between CM's and SRA's (right student, right course) Monitoring and tracking shared with Schools for SCP. Internal group supports younger students in partnership with local authority and SDS. LEAN 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> <p>Aligned to Strategic Aim: An effective and efficient college</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> <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>Jan-20</td><td>25</td><td>15</td></tr> <tr><td>Apr-20</td><td>25</td><td>15</td></tr> <tr><td>Sep-20</td><td>25</td><td>15</td></tr> <tr><td>Feb-21</td><td>25</td><td>15</td></tr> <tr><td>Apr-21</td><td>25</td><td>15</td></tr> <tr><td>Aug-21</td><td>25</td><td>15</td></tr> <tr><td>Oct-21</td><td>25</td><td>15</td></tr> <tr><td>Feb-22</td><td>25</td><td>20</td></tr> <tr><td>Apr-22</td><td>25</td><td>20</td></tr> <tr><td>Aug-22</td><td>25</td><td>20</td></tr> <tr><td>Oct-22</td><td>25</td><td>20</td></tr> <tr><td>Jan-23</td><td>25</td><td>20</td></tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	5	5	25	Residual (Net) Risk			Probability	Impact	Score	4	5	20	Date	Inherent Risk Score	Residual Risk Score	Jan-20	25	15	Apr-20	25	15	Sep-20	25	15	Feb-21	25	15	Apr-21	25	15	Aug-21	25	15	Oct-21	25	15	Feb-22	25	20	Apr-22	25	20	Aug-22	25	20	Oct-22	25	20	Jan-23	25	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, College to maintain cyber essentials plus accreditation. 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>	<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>The Security Operations Centre (SOC) has been up and running for a few months now. Efforts continue to improve our cyber-incident detection capabilities across the whole IT estate.</p>
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		<ul style="list-style-type: none"> Incident response planning. Data recovery systems prioritised (backups) and data recovery if breach occurs. <p>Both:</p> <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) BCM and disaster recovery discussions being help with key system leads throughout college to determine plans in place to continue business and recovery system in the event of a major stoppage due to a cyber-attack. 																					
<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> <p>Aligned to Strategic Aim: An effective and efficient college</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> 	Inherent (Gross) Risk			Probability	Impact	Score	4	5	20	Residual (Net) Risk			Probability	Impact	Score	4	4	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 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 	<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 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. 	<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> <ul style="list-style-type: none">
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		<ul style="list-style-type: none"> • 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"> • 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> <p>Aligned to Strategic Aim: An effective and efficient college</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> <tr> <td colspan="2">Movement</td> <td>↔</td> </tr> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	4	5	20	Residual (Net) Risk			Probability	Impact	Score	3	5	15	Movement		↔	<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>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) 	<p>1st line of defence:</p> <ul style="list-style-type: none"> • Commercial income targets set annually as part of budget setting process • Commercial income targets monitored and reported 6 monthly by Head of Commercial and VP Corporate Development. Finance and head of Commercial perform monthly update. • Procurement Team oversee compliance with policies and procedures <p>2nd line of defence:</p> <ul style="list-style-type: none"> • 6 monthly 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.
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		<ul style="list-style-type: none"> Marketing strategy for new commercial income in development – VP of Corporate Development now chairing curriculum meetings to oversee progress with scheduled activity New performance review meeting held every six weeks, chaired by VP Corporate Development and reporting to SMT and ET – alternative funding performance review, joint faculty and commercial team to review current targets 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 																																																									
<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> <p>Aligned to Strategic Aim: An effective and efficient college</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>Movement ⇄</p> <table border="1"> <caption>Risk Score History</caption> <thead> <tr> <th>Month</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> </tbody> </table>	Inherent (Gross) Risk			Probability	Impact	Score	4	5	20	Residual (Net) Risk			Probability	Impact	Score	3	4	12	Month	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	<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. 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. 	<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 (75% as at Oct 2022)</p> <p>Implementing automated reminders from iTrent when courses are due to expire</p>
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		<ul style="list-style-type: none"> 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: 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>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>Remedial (Impact):</p> <ul style="list-style-type: none"> In-house maintenance team carry out reactive maintenance where possible. Register in place 	<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. Estate's condition reviewed six monthly + monthly review of estates critical works register. 	<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>Aligned to Strategic Aim: An effective and efficient college</p> <p>Providing an excellent curriculum</p> <p>Delivering a superb student experience</p>		<p>to monitor works and log what works are not completed and prioritised</p> <ul style="list-style-type: none"> 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 Services Mangers and H&S Manager meets three weekly with COO. H&S + Sustainability + Facilities + Security + Porterage + Print Services + Vehicles + TFM + 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> <p>Aligned to Strategic Aim: An effective and efficient college</p>	<table border="1" data-bbox="341 1081 771 1365"> <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="341 1365 771 1648"> <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> <tr> <td colspan="2">Movement</td> <td>↔</td> </tr> </tbody> </table> 	Inherent (Gross) Risk			Probability	Impact	Score	4	4	16	Residual (Net) Risk			Probability	Impact	Score	3	3	9	Movement		↔	<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 Personal health assessment can be utilised if/when required 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> <p>Aligned to Strategic Aim: Supporting and inspiring our staff</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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Policy Number	CD 004
Level	3
Issue	3
Issue date	
Review Date	Feb 2024
Author	Emma Miller
SMT approval	TBC



For the future you want

Critical Incident Management

Policy and Procedure



Corporate Development

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1. PURPOSE AND SCOPE

The purpose of this policy is to assist Edinburgh College staff to manage the response to a critical incident.

A critical incident is defined as: "Any incident which is likely to have a serious impact on a student/s, staff member/s, people working in the College, key stakeholders, or the reputation of the College."

The College's CIM policy and procedure aligns to the new international standard IS22301, which states:

"In any critical incident situation there should be a simple and quickly formed structure that will enable the organisation to:

- Confirm the nature and extent of the critical incident.
- Take control of the situation.
- Contain the incident.
- Communicate with stakeholders."

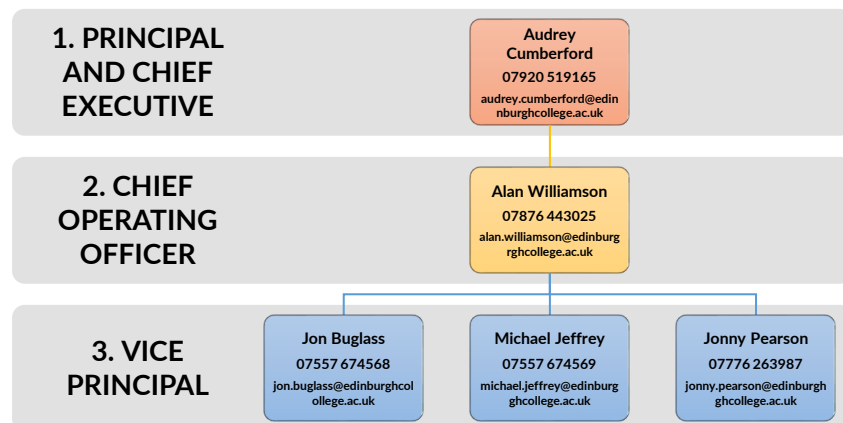
2. INCIDENT NOTIFICATION AND ESCALATION

If an incident happens at the College where there is a serious threat to life, safety or wellbeing, or a serious criminal act is in process or has occurred, staff must notify the police in the first instance, using 999.

If the critical incident is related to a loss of personal data or cyber threat/attack, then escalation should be directed to the Chief Operating Officer by the incident lead in the Information Management or IT team.

[The CIM policy and procedure does not supersede emergency response procedures i.e. fire evacuation.](#)

Thereafter, staff must contact the Executive team members indicated in the order identified below:



If contact with any of the above Executive team members is not possible, staff may call the College's business continuity lead;

- Head of Communications, Policy and Research, **Nick Croft on 07969 955386**
- Thereafter the staff member must notify their line manager

Once notification has been received by the Executive team member, they will make an assessment on the severity of the incident, and then decide whether to call a Critical Incident and establish a Critical Incident Management team (**CIM Team**), who may then invoke a range of actions and/or business continuity management plans, ~~and/or critical incident management plans~~.

3. CRITICAL INCIDENT MANAGEMENT PROCEDURE

The purpose of the critical incident management procedure is to enable the College to react as effectively and efficiently as possible to a critical incident, in a coordinated and well managed manner, and to communicate well with all affected or interested parties.

Once the Executive team member receives notification of an incident, they must make an initial risk assessment (~~table below~~) of the severity of the incident. The table below is a guide to quickly assess the severity of the incident, which utilises a simple 1-3 risk-based scoring system.

This may act as a formal record of the assessment, so due care and attention should be taken when assessing.

Executive team members are encouraged to discuss the assessment with other senior colleagues, if possible, to inform their assessment:

ASSESSMENT THEME	SCORE 1= low risk 2 = medium risk 3 = high risk
1. Is there a serious threat to life or safety for students, staff, or visitors?	
2. Is there a serious risk to student, staff, or visitor wellbeing?	
3. Is there a serious risk to the College's ability to deliver learning, teaching and assessment?	
4. Is there a serious risk to the College's ability to operate its estate?	
5. Is there a serious risk to the College's ability to deliver student services?	
6. Is there a serious risk to the College's ability to operate its IT systems?	
7. Is there a serious risk to the College's reputation?	
Total	/ 21

If the total risk is below 13, then the incident does not need to be named as critical and operational actions/plans will suffice.

If the total risk is 13 or above, then the Executive team member should formally name the incident a critical incident, and the critical incident procedure, indicated below, must be invoked:

CRITICAL INCIDENT PROCEDURE			
STEP 1: Response set-up & personnel			
1.1 Strategic lead (GOLD) assigned	1.2 Establish critical incident management (CIM) team	1.3 Appoint tactical lead (SILVER)	1.4 Response location established
The Executive team member to either take on the role for the critical incident (CI) or appoint another senior manager	The GOLD lead to assign members of the CIM team who will assess in more detail the impact on the college and agree a range of actions to manage the incident	The GOLD lead may also appoint a SILVER lead in the event of a complex critical incident to assist in assessing impacts and managing the CIM team response	Team to agree if a central location from which the CIM team can operate is needed. This will depend on the significance or impact of the incident
<i>Note: The GOLD lead will act as a single point of contact for external</i>	<i>Note: Business continuity management plans will list</i>	<i>Note: Typically, only needed for CI's which</i>	<i>Note: The Estates management team can advise on these matters</i>

agencies, like the police media or other significant stakeholders, who require contact with the college about the incident	the CIM team members for certain CI	have high risks to normal college operations	
STEP 2: Action			
2.1 CIM team to meet	2.2 Decided if business continuity management (BCM) plan needed	2.3 Funding	2.4 Deliver actions
To discuss options and agree/record actions to respond to the CI <i>Note: A decision log should be maintained throughout the life of the incident – See Appendix 1 for decision log template</i>	The CIM team to agree if a BCM plan is appropriate to invoke <i>Note: BCM plans available on college intranet and in red folders</i>	Approval for emergency funds should be sought if needed to respond to the critical event <i>Note: The CIM team must ensure that all associated costs are recorded on the decision log</i>	As agreed by the CIM team <i>Note: The primary purpose of the CIM team is to return the college to a business-as-usual state, as soon as possible</i>
STEP 3: Closure			
3.1 RECOVERY ASSESSMENT			
The CIM team to assess if a 'business-as-usual' state has been sustained and any remaining risks or impacts have been successfully managed, the GOLD lead may close the CI			
STEP 4: Lessons learnt			
4.1 A CRITICAL INCIDENT REPORT TO BE COMPLETED			
The GOLD lead and the Director of Communications, Policy & Research to write up a report for review and approval by the Executive and Senior Management Teams <i>Note: Critical incident report template is available</i>			
STEP 5: Review			
5.1 DOCUMENTS REVIEWED			
Once the critical incident report has been approved all relevant documentation should be sent to the Portfolio Manager in the Communication, Policy & Research department for appropriate storage The Portfolio manager will assess the lessons learnt and any other recommendations to make appropriate amendments to any associated plans, policies, or procedures.			

4. POLICY GOVERNANCE AND REVIEW

The accountable officer for this policy is the Director of Communications, Policy and Research, who will review this policy through the Executive team and Senior Management team (SMT) and on an annual basis, prior to the beginning of each academic year.

Responsibility for implementing the policy sits with Executive team and SMT.

5. APPENDIX 1 – CIM TEAM DECISION LOG (TEMPLATE)

DATE	TIME	ASSESSED IMPACT OR RISK	ACTION OPTIONS	AGREED ACTION AND OWNER	PROGRESS UPDATE

(NB. one option maybe to invoke a business continuity management plan, indicated at Appendix 23 below)

6. APPENDIX 2 – BUSINESS CONTINUITY PLANS

NB. Plans are published on the college intranet and printed in red folders in the boardroom and at reception on each campus.

PLAN NO	PLAN NAME	PLAN OWNER	DEPUTY	LAST REVIEW	NEXT REVIEW
1	Cyber Attack	COO Chief Operating Officer	Gordon Hope Graham Inglis	April 2021	April-2023
2	Loss of Site or Loss of Access to Site	Chief Operating Officer COO	Dave Keen Colin McLaren	October 2021 November 2022	October 2022 November 2023
3	Loss of Utilities	Chief Operating Officer COO	Dave Keen Colin McLaren	November 2022 October 2021	November 2023 October 2022
4	Terrorist Threat/Attack	Executive Team	Dave Keen Colin McLaren	October 2022 August-2021	October 2023 August-2022
5	Pandemic	VP of Corporate Development	Andy Bamberry	October 2022 August-2021	October 2023 August-2022
6	Adverse Weather	Executive Team	Dave Keen Colin McLaren	April 2021 October 2022	April 2022 October 2023

7. APPENDIX 3 – COMMUNICATION CONTACTS

COMPANY/AREA	CONTACT NAME(S)	TELEPHONE NUMBER(S)	WEB ADDRESS/EMAIL
Scottish Fire and Rescue Service	Emergency Sighthill Granton Milton Midlothian	999 0131 442 1420 0131 332 6315 0131 669 5110 0131 660 2619	www.firescotland.gov.uk
Police Scotland	Emergency Non-emergency	999 101	www.scotland.police.uk
Scottish Ambulance Service	Emergency National HQ Divisional HQ	999 0131 314 0000 0131 314 0137	www.scottishambulance.co.uk
Radio stations	Radio Forth	0131 556 9255	www.forth1.com
	Heart Radio	0141 781 1011	www.heart.co.uk
	Borders Radio	0189 675 1010	www.radioborders.com
Scottish Funding Council	Outcome Agreement Manager Seamus Spencer	0131 313 6673	www.sfc.ac.uk
Scottish Qualifications Authority	Regional Manager Theresa McGowan	0774 103 7255	www.sqa.org.uk theresa.mcgowan@sqa.org.uk
Zurich Municipal	Kirsty Forsyth	0141 204 7010 07767 225537	www.zurich.co.uk kirsty.forsyth@uk.zurich.com
Estates Management team	Estates Manager - TBC (all estate)		
	Dave Keen (Granton and Milton Road)	07734 948032	dave.keen@edinburghcollege.ac.uk
	Colin McLaren (Sighthill and Midlothian)	07989 132080	colin.mclaren@edinburghcollege.ac.uk
Public Health	Public Health Protection Team (Duty System)	0131 465 5420 Out of hours service: 0131 242 1000	Na
Colleges Scotland	Head of Communication & Public Affairs – Will McLeish	0178 689 2100 0771 240 4397	will.mcleish@collegesscotland.au.uk

8. APPENDIX 4 – KEY DOCUMENTS AND FILES

DOCUMENT OR FILE NAME	LOCATION (S)	FORMAT	DOCUMENT OWNER
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CIM Policy and Procedure (this document)	Reception - Premises Information Folders	Hard Copy	Portfolio Manager
	Boardroom – Red folders	Hard Copy	Portfolio Manager
	Offsite with key members of staff	Hard Copy	Portfolio Manager Director of Communications, Policy, and Research
	Office 365 Teams – dedicated Critical Incident and Business continuity Teams site	Soft copy – Word	Portfolio Manager
	Staff Intranet - EC Staff Intranet (edinburghcollege.ac.uk)	Soft copy - PDF	Portfolio Manager
Site Plans	Local network drives (S) - S:\Estates Services\Private\Resources and Facilities\Floor Plans Estates - One Drive	AutoCAD (soft) or PDF	Facilities Managers
	Reception - Premises Information Folders	Hard Copy	Facilities Managers
	Boardroom – Red folders	Hard Copy	Facilities Managers
	Offsite with key members of staff	Hard Copy	Facilities Managers Director of Communications, Policy, and Research
Business Continuity Management Plans (BCM Plans)	All campus boardrooms	Hard Copy	Portfolio Manager
	Office 365 Teams – dedicated Critical Incident and Business continuity Teams site	Soft copies – Word	Portfolio Manager
	Staff Intranet - EC Staff Intranet (edinburghcollege.ac.uk)	Soft copies - PDF	Portfolio Manager
	Offsite with key members of staff	Hard Copy	Portfolio Manager Director of Communications, Policy, and Research

9. APPENDIX 5 – CONTACT SHEETS

EXECUTIVE TEAM		WORK NUMBER	CAMPUS	MOBILE
Audrey Cumberford	Principal and Chief Executive	0131 297 9333	Milton Rd	07920 519165 (Personal mobile)
Trish Hanlon	Executive Development Manager Executive Support to: Audrey Cumberford	0131 297 8175	Milton Rd	07876 873338
Alan Williamson	Chief Operating Officer	0131 297 9160	Milton Rd	07876 443025
Pauline MacPherson	Governance, Compliance and Information Officer	0131 297 9291	Milton Rd	

	Executive Support to: Alan Williamson			
Jon Buglass	Vice Principal: Innovation, Planning and Performance	0131 297 9197	Milton Rd	07557 674568
Jonny Pearson	Vice Principal: Education and Skills	0131 297 8449	Milton Rd	07776 263987
Emma Degnan	Executive Support to: Jon Buglass and Jonny Pearson	0131 297 9151	Milton Rd	
Michael Jeffrey	Vice Principal: Corporate Development	0131 297 9267	Milton Rd	07557 674569
Rhona Wallace Burgess	Executive Support to: Mike Jeffrey	0131 297 9152	Milton Rd	

GOVERNANCE		WORK NUMBER	CAMPUS	MOBILE
Ann Landels Nora Senior	Interim Chair of the Board of Management		Milton Rd	07770 886921 (Private) 07744 718783
Marcus Walker	Clerk and Governance Advisor to the Board of Management	0131 297 9326	Milton Rd	07909 510056

RECEPTION / SECURITY	NUMBER	HOURS
Main College	0131 669 4400	8am - 5pm
Edinburgh Console	Ext. 7000	
Granton Console 1	Ext. 7019	
Granton Console 2	Ext. 7017	
Midlothian Console	Ext. 7001	
Milton Rd Console 2	Ext. 7002	
Sighthill Campus 1	Ext. 7015	
Sighthill Campus 2	Ext. 7016	
First Aid (ring group of the below first aid phones located at each campus reception)	Ext. 2222 (can be used from any emergency phone or Teams call)	
Sighthill	0131 297 9107	
Granton	0131 297 9108	
Milton Rd	0131 297 9109	
Midlothian	0131 297 9110	
IT Helpdesk	0131 297 9090	8am - 4.30pm Mon-Fri

Gather & Gather - Gareth Hoffman Laura Cameron, Group Manager	07501 728908 07788 301544	
Mark Timmins - Security	0131 297 8494 0787 687 3320	
Security - Granton	0782 569 3996	7am - 9.30pm 7am - 10pm
Security - Milton Rd	0791 785 1113	7am - 9.30pm 7am - 10pm
Security - Midlothian	0781 469 4821	7am - 9.30pm 7am - 10pm
Security - Sighthill	0773 976 1965	7am - 9.30pm 7am - 10pm
<u>Night Security</u>	<u>0773 300 1050</u>	
Halls security office	0131 344 7099	<u>21.15pm-7.15am Mon-Fri</u> <u>6pm-9am Sat</u> <u>6pm-7.15am Sun</u>

SENIOR MANAGEMENT TEAM		WORK NUMBER	CAMPUS	MOBILE
Monica Hoenigmann Anne-Marie Sturrock	Assistant Principal Curriculum: Health, Wellbeing and Social Sciences	0131 297 8601	Sighthill	07876 873342 07500-607704
Amanda Cameron	Centre Administrator, HWSS	0131 297 8397	Sighthill	07876 873302
Shona Pettigrew	Director of Enterprise & Knowledge Exchange <u>(Commercial Development Team)</u>	0131 297 8049	Milton Rd	07977 048914
Jakki Jeffery	Assistant Principal Curriculum: Creative Industries	0131 297 8810	Granton	07876 873309
Andy Duncan	Centre Administrator, CI	0131 297 8237	Sighthill	07527 536931
Kerry Heathcote Position VacantGail Graham	Assistant Principal Curriculum: Quality and Improvement	0131 297 8136	Granton	07737 173074
Lindsay Towns Sarah-Louise Nandadasa (Acting) Ian Deed	Director of Finance <u>and</u> Infrastructure	0131 297 8541910 48154	Sighthill	0777 5940844
Monica Hoenigmann Nicola MacKenzie	Assistant Principal Curriculum: Student Experience	0131 297 9496	Midlothian	07500607698
Debbie MacSorley Mayowa Akinpeloye	Centre Administrator, SE (secondment)	0131 297 82549047	Milton Rd	
Nick Croft	Director of Communications, Policy and Research	0131 297 9747	Milton Rd	07969 955386

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Karen Stevenson	Assistant Principal Curriculum: Tourism, Hospitality and Business	0131 297 8434	Sighthill	07876 873329
Mhairi Young	Centre Administrator, BHT Faculty Office Manager (THB)	0131 297 8169	Sighthill	
Scott Warden	Assistant Principal Curriculum: Engineering and Built Environment	0131 297 9575	Granton/ Midlothian	07733 363173
Karen McClung	Centre Administrator, Engineering	0131 297 9252	Midlothian	
Sheila McKenzie	Centre Administrator, Engineering	0131 297 9262	Midlothian	
Sue Clyne	Director of HR and OD	0131 297 9809	Milton Rd	07876 873347 07971 327476

ECSA		WORK NUMBER	CAMPUS	MOBILE
Al Wilson	Director, ECSA	0131 297 9682	All	07956 426948
Rose Dodgson	Student President until July 2022	0131 297 9232	All	

FACULTY MANAGERS		WORK NUMBER	CAMPUS	MOBILE
Caroline Hairs	Head of School: Health Professions & Social Services	0131 297 8960	Granton	07769 234163
Carole Paterson	Head of School: Travel, Tourism, International & Commercial	0131 297 8168	Sighthill	07876 873307
Frances Bain	Head of School: Hair, Beauty & Complimentary Therapies	0131 297 8682	Granton	07876 873293
Garry Maxwell	Head of School: Construction & Built Environment	0131 297 8992	Granton	07805 046983 07876 873217
Jonathan Bennett	Head of School: Media, Music & Sound Production	0131 297 9610	Sighthill / Milton Rd	07876 873298
Kay Penman	Head of School: ESOL (Community Based) & Modern Languages	0131 297 8127	Duncan Place	07876 873317
Laura Bryan	Curriculum Team Manager: Hospitality, Retail & Events (Job share with Mandy Purdie)	0131 297 8170	Sighthill	
Lynn Loudon	Head of School: Enterprise & E-Commerce	0131 297 8281	Milton Rd	07585 227521

Mandy Purdie	Curriculum Team Manager: Hospitality, Retail & Events (Job share with Laura Bryan)	0131 297 8683	Milton	07876 873214
Marjory Crooks	Curriculum Manager: Broadcast Media	0131 297 8255	Sighthill	07876 873299
Neil MacKenzie	Head of School: Sport & Fitness	0131 297 8452	Granton	07876 873310
Neil Manning	Head of School: Art & Design	0131 297 8780	Granton	07876873303
Ross Milligan Ronald Eldridge	Head of School: Engineering	0131 297 92689817	Milton Rd	07876 873312 07824 776028
Ryan Quinn	Head of School: Social Science & Integrated Curriculum Services	0131 297 8572	Sighthill	07768 523346 07876 873304
Sam Blyth	Head of School: Computing	0131 297 9192	Milton Rd	07876873305
Sarah Donno	Head of School: ESOL	0131 297 8326	Sighthill	07876 873318
Stephanie Tanner/ Mandy Purdie Job Share	Curriculum Team Managers: Hospitality, Professional Cookery, Retail & Events	0131 297 9146 0131 297 8683	Milton Rd	NA 07969 955340 07786 672271
Ethelinda Lashley- Scott Winifred Jamieson	Head of School Curriculum Manager: Performing Arts and Photography	0131 297 87818056	Granton	07739 217888
Tom MacGregor Position Vacant	Head of School: Childhood Practice & SVQ Provision	0131 297 8926	Granton	
Lindsey Chisholm Position Vacant	Head of School: Access and Continuing Education	0131 297 9498	Milton Rd	

MIDDLE MANAGERS - SUPPORT		WORK NUMBER	CAMPUS	MOBILE
Alan Meechan	Business Solutions Development Lead Development Service Lead	0131 297 8564	Milton Rd	
Andy Bamberry	Health & Safety Manager	0131 297 9554	Sighthill	07876 873234
Bethany Winkler	SE Manager: Access Centre	0131 297 8275		
Caryn Smith	SE Manager: LDTs, Student Funding and Reception SE Funding Manager: Funding, Reception, LDT's & Guidance	0131 297 8015	Sighthill	07876 873239
Catherine McCormack	SE Manager: Learning Support & Wellbeing	0131 297 9024	Milton	07557 683692

Chris Adams	Finance Manager: Management Accounting & Costing	0131 297 9158	Sighthill	
Colin McLaren	Estates Services Manager	0131 297 9371	Sighthill	07989 132080
Dave Keen	Estates Services Manager	0131 297 9388	Granton	07734 948032
<u>David Hiddleston</u>	<u>Curriculum Manager: DDI Skills Gateway</u>	<u>0131 297 8987</u>	<u>Granton</u>	<u>07803 277671</u>
David McLachlan	Learning Technology & Resources Manager	0131 297 9613	Sighthill	07763281498
Deborah Robertson	Strategic Lead: Developing the Young Workforce & Schools College Partnerships	0131 297 9628	Sighthill	07977 049205
Diane Gordon	Events & Stakeholder Manager	0131 297 9149	Milton Rd	07876 873334
Emma Miller	Portfolio Manager	0131 297 8113	Milton Rd	
Gavin Lang	Quality Assurance Manager	0131 297 8135	Sighthill	
Gordon Hope	Digital Infrastructure Service Lead	0131 297 8112	Sighthill	
Graham Inglis	Digital Devices and Quality Service Lead	0131 297 8105	Sighthill	
Irene Michie	HR Manager-Systems-& Policies Projects & Systems Manager	0131 297 9044	Milton Rd	<u>07502 417874</u>
Irene Ritchie / Nicola MacKenzie	SE-Manager: Student Support	0131-297-9010 0131-297-9031	Milton Rd	07876-873340
Jane Gillham	Access Centre Manager	0131 297 8029	Sighthill	
<u>Janine Stewart</u>	<u>Nursery Manager</u>	<u>0131 297 8530</u>	<u>Granton</u>	<u>07837 722038</u>
Katie Willis <u>Khan</u>	HR Manager Operations	0131 297 9043	Milton Rd	07876 873241
Linda Grant	MIS Manager	0131 297 8636		
Liam Conway	Business Relations Manager	0131 297 8287	Sighthill	
Lizi Bird	Data Protection Officer		Milton Rd	07436 029310
Lorraine Lyall	Quality Enhancement Manager	0131-297-8660	Granton	07736-336658
Lorraine Dunlop	Finance Manager	0131-297-8185	Sighthill	07876-873341
Lynn Kinloch	HR Manager Employee Relations- Partnering	0131 297 9042	Milton Rd	
Lucie Dingle	Communications & Social Media Manager	0131 297 8025	Milton Rd	07876 873327
<u>Martin Smith</u>	<u>Contracts Developer</u>	<u>0131 297 8864</u>	<u>Sighthill</u>	
Nick Murton	Information Manager	0131 297 8663	Milton Rd	07714 715287
<u>Nikki Mealyou</u>	<u>Curriculum Leader: Quality Enhancement Team</u>	<u>0131 297 8988</u>	<u>Granton</u>	

Nyree Grierson	OD Manager	0131 297 9049	Milton Rd	
Paul McGee	Accommodation/Leisure Manager Milton Halls and Club	0131 297 9214	Milton Rd	07926141316 (personal)
Rena Cowan	Student Records Manager SE Manager: Recruitment & Admissions	0131 297 9054	Milton Rd	
Renee Kidd	Marketing Manager	0131 297 9730	Sighthill	07876 873326
Ronald Beckett	Head of Procurement	0131 297 8592	Sighthill	
Sarah-Louise O'Hare	Financial Accountant Manager	0131 297 9104	Sighthill	07975 758532
Sarah Gibson	Accommodation Manager, CRM Students Limited	0131 511 2007	Granton	
Sarah Gore	International Business Manager	0131 297 8295	Sighthill	07500 607701
Scott Young	Financial Accountant	0131 297 8420	Sighthill	
Vicki Shiels	Nursery Manager	0131 297 8876	Granton	07837 722038

Form:	
Issue Number:	
Issue Date:	
Review Date:	
Prepared By:	



For the future you want

Business Continuity Management Plan

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

EVENT: LOSS OF SITE

Please choose: Corporate level plan (whole college) Operational level plan (key business area)

Plan intended for long-term loss of a college site/campus where learning/teaching and working must be relocated to maintain business as usual.

Initial incident response information:

This plan takes effect once the Critical Incident Management Team have agreed long term site/campus closure is required and alternative learning/teaching and working arrangements are necessary.

MOU should be referenced to determine if on-campus activity can be relocated to a partnered location.

Plan owner

Chief Operating Officer

Tasks / Response Actions	Function Responsible
A. CIM TEAM	
1. Agree if immediately affected classes need to be cancelled until alternative arrangements can be made for learning/teaching	CIM Team
2. Agree what level of access is allowed on site/campus moving forward e.g., essential estates management (See C. Estates)	CIM Team
<u>3. Agree overtime and additional contracted hours are to be paid to staff who are assisting with recovery and BC arrangements</u>	<u>CIM Team</u>
3.4. (If required) Engage security and other key on-site staff to complete sweep across site/campus to advise all of closure and provide instructions on vacating	Estates Services Manager/s
<u>5. (During or nearing exam time) Inform SQA of site closure and discuss if assessments can be relocated or if "best grade" is the most viable solution should relocation not possible</u>	<u>CIM Team</u> <u>SQA</u>
4. Direct communications to be sent to affected Staff and Students to notify of site/campus closure and relevant instructions: a) Email b) Text message c)a) Phone call (staff)	Communications Manager SMT
5.6. Advise Room Bookings and MIS Teams of site/campus closure timeframes	Assistant Principal Quality & Improvement

<p><u>7.</u> Determine if alternative learning/teaching location/s can be utilised during closure for timetabled classes:</p> <p>a. —MOU arrangements to be reviewed <u>and partners contacted to agree us of space during disruption period</u></p> <p>b. <u>Relocate to another college campus</u></p> <p>a-c. <u>Relocate to another locations e.g. Sighthill office complex</u></p>	CIM Team
<p><u>Insurance – Zurich</u></p>	
<p><u>8.</u> <u>Contact insurer and advise of site loss – insurer may send loss adjuster to assess damage onsite</u></p>	<u>CIM Team</u>
<p><u>9.</u> <u>Asset lists provided to insurers:</u></p> <p>a. <u>Machinery</u></p> <p>b. <u>IT equipment</u></p> <p>c. <u>Learning and Teaching equipment</u></p> <p>d. <u>etc</u></p>	<u>Estates Services Manager/s</u> <u>Digital Infrastructure Lead</u> <u>Digital Devices and Quality Services Lead</u>
<p>6. Contact and agree with MOU partners for use of space during disruption period</p>	Nominated CIM Team member/s
<p>7. Provide Managers with instructions on agreed alternative on-site arrangements</p>	SMT
<p>B. COMMUNICATIONS</p>	
<p><u>2.</u> <u>Agree messaging and method of communications from the below:</u></p> <p>a. <u>Email templates that can be used for students, staff and stakeholders</u></p> <p>b. <u>Direct txt messages (check/update TxtTools database)</u></p> <p>c. <u>Call staff and students directly</u></p> <p>d. <u>Update main college phoneline switchboard with messaging and new extension to dedicated helpline</u></p>	<u>CIM Team</u> a. <u>Comms team</u> b. <u>HR, Student Records, & Comms team</u> c. <u>SMT & Managers</u> d. <u>IT & Comms team</u>
<p><u>3.</u> <u>(If d. option above is selected) Set-up staff to answer high level of incoming calls via agreed phone lines</u></p>	<u>Assistant Principal Curriculum: Student Experience</u> <u>Digital Infrastructure Lead</u> <u>Digital Devices and Quality Services Lead</u>
<p>2.4. 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> <p>a) Update website</p> <p>b) Update Social Media channels</p> <p>c) Email radio stations</p> <p>d) Send All Staff email</p> <p><u>e) Send All Student email</u></p> <p><u>e)f) Media messaging (if agreed required)</u></p> <p>f) Send All Staff text message</p> <p>g) Send All Student text message</p> <p>h)g) Inform Students' Association for sharing across channels</p>	Communications Manager

3.5. Co-ordinate ECSA communications to mirror overall college message	ECSA Director Communications Manager
4. Communications to staff, students, and visitors to advise of continuing situation and any further updates	Communications Manager
C. ESTATES	
1. Notify ISS of closure period	Estates Services Manager/s
2. (If required) CCTV will be monitored remotely	Estates Services Manager/s Security Team Manager/ ISS
3. Alarm company to <u>be notified and if possible,</u> 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 Service) Site dependant	Estates Services Manager/s ISS Soft Services Manager Security Team Manager
5. (If possible) Estates manager and security staff to visit college sites on a rotational basis over the closure closure period during normal working hours	Estates Services Manager/s Security Team Manager
6. ISS on call engineer available 24/7	Estates Services Manager/s
7. If closure exceeds two weeks and CIM Team has agreed that no site/campus access is possible/allowed: 7.1. review heating and agree if it will be turned off 7.2. legionella flushing to be carried out 7.3. agree if club pool should be drained with Club manager	Estates Services Manager/s
8. Determine if College e-Cars/ Minibuses are to be relocated for use at other campuses during closure	Estates Services Manager/s
D. CURRICULUM	
1. (If "Best grade" is agreed with SQA) Inform curriculum staff to start predictive grading of students	SMT (Curriculum)
1.2. (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)	Managers CMs
2.3. CMs to a Advise all staff to contact students and implement remote working procedures <u>or organise relocation to another site</u>	Managers CMs

3.4. Contact accrediting bodies (if necessary) to advise of closure and make alternative arrangements where possible	<u>Managers</u> CMs
E. HUMAN RESOURCES	
1. Agree if the college will continue to honour additional contracted hours even if the hours are not actually worked	Director of HR / OD
2. (If applicable) Interviews, tribunals, and open grievance / disciplinary cases booked at closed site/campus to be placed on hold, rescheduled/ relocated <u>relocated</u> , or changed to online delivery	Director of HR / OD
3. (If applicable) OD activity booked at closed site/campus to be placed on hold, rescheduled/relocated or changed to online delivery	Director of HR / OD
4. Staff advised to complete mandatory compliance training when possible	Comms Manager
F. SALONS ^(MR/G), RESTAURANTS ^(MR/G), THEATRE ^(G) AND MUSIC BOX ^(SH)	
1. Contact bookings to advise of closure and cancel/reschedule	CMs <u>Managers</u>
2. Update Facebook and other social media platforms	<u>Managers</u> CMs
3. Contact suppliers to advise of closure and where possible make alternative arrangements / reschedule	<u>Managers</u> CMs
G. COFFEE SHOPS	
1. Liaise with Catering Manager, G&G to advise of campus closure	Estates Services Manager/s
H. IT	
1. Report to the CIM Team on the capacity (number of remote users and quantity of concurrent connections) of our remote working, telecommunications, and VPN solutions, outlining any necessary investment	Digital Infrastructure Lead Digital Devices and Quality Services Lead
2. Manage request for IT equipment for at home use	Digital Devices and Quality Services Lead
3. Rotation of Backup Tapes	Digital Infrastructure Lead
4. (If required - Sighthill) Reschedule/cancel Voltage checks at data centre at Sighthill scheduled to be carried out	Digital Devices and Quality Services Lead
5. Working from home guidance reviewed to confirm access/login information correct	Digital Devices and Quality Services Lead
I. CLUB & HALLS OF RESIDENCE (Milton Campus)	
Halls	
1. Assess whether Milton halls can remain open and advise CIM Team if relocation to temporary accommodation is required	Milton Halls/Club Manager

Note: Hall department BCM plan outlining accommodation relocation should be referenced if agreed that students cannot remain in halls of residence	
2. Contact all Halls staff and provide instructions (closed or open) Note: these instructions may differ from overall instructions delivered through college communications	Milton Halls/Club Manager
3. If Hall to close: Contact halls suppliers to advise of situation and if necessary, make alternative arrangements	Milton Halls/Club Manager
Club	
4. Assess whether Milton club can remain open if campus is closed and advise CIM Team	Milton Halls/Club Manager
5. Contact all Halls staff and provide instructions (closed or open) Note: these instructions may differ from overall instructions delivered through college communications	Milton Halls/Club Manager
6. If Club to close: 6.1. Contact Club members to advise of closure and cancel/reschedule 6.2. Update Club bookings system, Facebook and other social media platforms controlled by the Club	Milton Halls/Club Manager
J. NURSERY (Granton Campus)	
1. Liaise with Nursery Manager to advise of campus closure and agree if nursery is to close. (If nursery is to close follow steps 2 – 6)	Director of Comms, Policy and Research
2. Determine if relocation is required to maintain child welfare while waiting for pick up by parent/guardian	Nursery Manager
3. Contact all nursery staff to advise of campus closure and provide instructions Note: these instructions may differ from overall instructions delivered through college communications	Nursery Manager
4. Contact parents/guardians to advise of nursery closure timeframes and organise pick-up of children	Nursery Manager
5. Inform council and care inspectorate of nursery closure timeframes	Nursery Manager
6. Provide clarification to parents/guardians regarding fees during closure period	Nursery Manager
K. FINANCE (Sighthill campus)	
1. Ascertain continuity of financial systems – Agresso / Pecos/ Banking software	Director of Finance
2. Test /Ensure Students/-suppliers can be paid	Director of Finance
3. Processing contract variations updated in iTrent remotely	Director of Finance
4. Contingencies agreed for April payroll challenges due to HMRC year-end	Director of Finance

5. iTrent - updating to be done so that payroll can be run for March and (with all the tax code changes) in April	Director of Finance
L. SUPPORT STAFF	
1. Middle Managers to e Contact staff to discuss remote working procedures and/or alternative working arrangements during campus closure	<u>SMT</u> <u>School heads</u> Middle Managers
M. EXTERNAL STAKEHOLDERS	
1. SMT and Middle Managers to contact key external stakeholders that have been identified via the relevant area's Business Impact Assessment of college closure Note: Contact details of external stakeholders are held by the relevant area	SMT Middle Managers

Appendix

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 Granton / Milton Estates Services Manager Health and Safety Manager 	<ul style="list-style-type: none"> Executive Management Team Senior Management Team Milton Halls/Club Manager Nursery Manager ECSA Director Communications Manager Portfolio Manager Event & Stakeholder Manager Digital Infrastructure Lead Digital Devices and Quality Services Lead 	<ul style="list-style-type: none"> Contract bus service (OPITO students)

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

Form:	
Issue Number:	
Issue Date:	
Review Date:	
Prepared By:	

Business Continuity Management Plan

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

EVENT: LOSS OF UTILITY

Please choose: Corporate level plan (whole college) Operational level plan (key business area)

Plan intended for long-term loss of utilities (gas, water, power) which results in campus closure.

- Gas – no capacity when shut off
- Electricity – generators for server rooms; 3 hour emergency lighting
- Water – all campuses have good water tank capacity of mains burst occurs. Granton water is pumped so affected by power cut

Initial incident response information:

Estates Services Manager/s to carry out assessment of conditions / impact / likely duration to determine if event will be prolonged and therefore the Executive team should be contacted as per the Major Incident Management Policy and Procedure to determine if campus closure is required.

MOU should be referenced to determine if on-campus activity can be relocated to a partnered location

Plan owner

Chief Operating Officer

Tasks / Response Actions	Function Responsible
A. CIM TEAM	
<u>1. Agree if loss of utility will be prolonged and if campus is to remain open</u>	<u>CIM Team</u>
<u>2. Agree what level of access is allowed on site/campus while utility is off-line e.g., essential estates management</u>	<u>CIM Team</u>
<u>3. Review if other campuses or alternative learning/teaching locations can be utilised during outage.</u>	<u>CIM Team</u>
1. Review of MOU agreement to determine if alternative learning/teaching location can be utilised during closure for timetabled classes	<u>CIM Team</u>
<u>2.4.(If agreed) Contact and agree with MOU partners for use of space during disruption period</u>	<u>GOLD Lead</u>
B. COMMUNICATIONS	
<u>1. Agree what communications are to be sent outlining disruption event and immediate instructions</u>	<u>Communications Manager</u> <u>CIM Team</u>

<p>1.2. Communications Manager or their appointed deputy to deploy wider college comms as required regarding campus closure, continuity of learning arrangements and accessing of work systems:</p> <ul style="list-style-type: none"> a) Update website b) Update Social Media channels c) Email radio stations d)c) Send All Staff email e)d) Send All Student email f)e) Send All Staff text message g)f) Send All Student text message h)g) Inform Students' Association for sharing across channels 	<p>Communications Manager</p>
<p>2.3. Co-ordinate ECSA communications to mirror overall college message</p>	<p>ECSA Director Communications Manager</p>
<p>3. Contact Managers to advise of campus closure due to utility loss and provide instructions for remote / alternative working arrangements</p>	<p>SMT</p>
<p>C. ESTATES</p>	
<p>1. Notify ISS of closure period <u>loss of utility and campus access agree by CIM Team</u></p>	<p>Estates Services Manager/s</p>
<p>2. Maintain contact with service providers and deliver ongoing updates to CIM Team, including estimated down time and service repair requirements</p>	<p>Estates Services Manager/s</p>
<p>3. <u>If local P</u>power loss (if applicable to situation) Investigate alternative power sources and employ generators to maintain IT services</p> <p><u>For widespread power loss please refer to BCM Plan – National Power Outage</u></p>	<p>Estates Services Manager/s Digital Infrastructure Lead Digital Devices and Quality Services Lead</p>
<p>D. RESTAURANTS AND HAIR & BEAUTY SALONS</p>	
<p>1. Contact bookings to advise of closure and cancel/reschedule</p>	<p>CMs <u>Managers</u></p>
<p>2. Update Facebook and other social media platforms controlled by Restaurants/Salons</p>	<p><u>Managers</u> CMs</p>
<p>3. (If applicable) Contact suppliers to advise of closure and where possible make alternative arrangements / reschedule</p>	<p><u>Managers</u> CMs</p>
<p>A. COFFEE SHOPS</p>	
<p>1. Liaise with Catering Manager, G&G to advise of campus closure <u>of utility outage and agree if coffee shops are to close</u></p>	<p>Estates Services Manager/s</p>
<p>E. CLUB & HALLS OF RESIDENCE</p>	
<p>1. Assess whether Milton halls can remain open and advise CIM Team if relocation to temporary accommodation is required</p> <p>Note: Hall department BCM plan outlining accommodation relocation should be referenced if agreed that students cannot remain in halls of residence</p>	<p>Milton Halls/Club Manager</p>

<p>2. Contact all Halls and Club staff to advise closure conditions and provide instructions</p> <p>Note: these instructions may differ from overall instructions delivered through college communications</p>	Milton Halls/Club Manager
<p>3. Contact Club members to advise of closure and cancel/reschedule</p>	Milton Halls/Club Manager
<p>4. Update Club bookings system, Facebook and other social media platforms controlled by the Club</p>	Milton Halls/Club Manager
<p>5. Contact halls suppliers to advise of situation and if necessary, make alternative arrangements</p>	Milton Halls/Club Manager
B. NURSERY (Granton Campus)	
<p>1. Liaise with Nursery Manager to advise of campus closure and to agree if relocation is required to maintain child welfare while:</p> <p>a. waiting for pick up by parent/guardian</p> <p>a.b. waiting for restoration of utility</p>	Director of Comms, Policy and Research
<p>2. Contact all nursery staff to advise of campus closure and provide instructions <u>disruption and provide instructions</u></p> <p>Note: these instructions may differ from overall instructions delivered through college communications</p>	Nursery Manager
<p>3. <u>(If required)</u> Contact parents/guardians to advise of nursery closure and organise pick-up of children</p>	Nursery Manager
F. CURRICULUM	
<p>1. <u>(If required)</u> Contact contract bus to advise of early campus closing and agree an earlier pick up for students. (OPITO students only)</p>	<u>CMs</u> Managers
<p>2. <u>Contact staff to discuss working requirements and put into place alternative procedures</u> CMs to advise all staff to contact students and implement remote working procedures</p>	CMs
<p>3. <u>(If required)</u> Contact accrediting bodies (if necessary) to advise of closure and make alternative arrangements where possible</p>	<u>Managers</u> CMs
C. SUPPORT STAFF	
<p>1. <u>Contact staff to discuss working requirements and put into place alternative procedures</u> Middle Managers to contact staff to discuss remote working procedures and/or alternative working arrangements during campus closure</p>	Middle Managers
D. EXTERNAL STAKEHOLDERS	
<p>1. SMT and Middle Managers to 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>	SMT Middle Managers

Appendix

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 ManagerGranton / Milton Estates Services ManagerHealth and Safety Manager	<ul style="list-style-type: none">Executive Management TeamSenior Management TeamMilton Halls/Club ManagerNursery ManagerECSA DirectorCommunications ManagerPortfolio ManagerEvent & Stakeholder ManagerDigital Infrastructure LeadDigital Devices and Quality Services Lead	<ul style="list-style-type: none">Contract bus service (OPITO students)

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 - February 2023
Appendices	None
Disclosable under FOISA	Yes
Primary Contact	Nick Croft, Director of Communication, Policy & Research
Date of Production	01.02.23
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 November 2022 to 31 January 2023 (Quarter 2).

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'.

AUDIT & RISK ASSURANCE COMMITTEE
22 FEBRUARY 2023
PAPER I



For the future you want

Title	Internal Audit Progress Report
Appendices	Appendix 1: Internal Audit Progress Report – February 2022
Disclosable under FOISA	No
Primary Contact	Chloe Main, BDO
Date of Production	10.02.23
Action Required	Information

1. RECOMMENDATIONS

The Audit & Risk Assurance Committee are asked to note the attached Internal Audit Progress Report.

2. PURPOSE OF REPORT

This paper provides a summary of internal audit activity during the year to date. It also confirmed the reviews planned for the coming quarter, identifying any changes to the original annual plan, where relevant.

3. DETAIL

The Internal Audit Progress Report is attached as Appendix 1.

4. IMPACT AND IMPLICATIONS

The Audit & Risk Assurance Committee, on behalf of the Board, is required to ensure that effective internal controls are in place.


5. LINKS TO STRATEGIC PLAN AND KPIS

The activities and key priorities described in Appendix 1 are linked to the full range of strategic aims and key performance indicators agreed by the Board of Management.



EDINBURGH COLLEGE INTERNAL AUDIT PROGRESS REPORT 2021-22

February 2023



IDEAS | PEOPLE | TRUST



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Restrictions of use

The matters raised in this report are only those which came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

EXECUTIVE SUMMARY

Introduction

The purpose of this report is to *advise* the Audit & Risk Assurance Committee of the progress of the Internal Audit Plan for 2022-23. This paper together with progress and assignment updates are discussed with management and the Audit & Risk Assurance Committee throughout the year. These reports will form the basis of information to support our Annual Internal Audit Report for 2022-23.

Internal Audit Plan 2022-23




Since the last Audit & Risk Assurance Committee meeting, the following internal audit reports have been finalised, and are presented under separate cover:

- Freedom of Information
- Staff Wellbeing

Conclusion

The Audit & Risk Assurance Committee is asked to *note* this report.

WORK COMPLETED

Reports Issued	Overall Report Conclusions - see appendix I				
				Design	Operational Effectiveness
Complaints Management	0	2	2	Moderate	Moderate
Freedom of Information	0	0	1	Substantial	Substantial
Staff Wellbeing	0	4	4	Moderate	Moderate

PERFORMANCE AGAINST OPERATIONAL PLAN

Visit	Date of visit	Proposed Audit	Planned Days	Actual Days	Status
1	September 2022	Complaints Management	6	6	Complete
2	November 2022	Freedom of Information	5	5	Complete
3	January 2023	Sustainability	5	-	In Progress
4	December 2022	Staff Wellbeing	5	5	Complete
5		Cyber Review	15	-	Block 3: Feb - April 2023
6		Fraud Strategy	6	-	Scheduled May 2023
7		Follow Up	3	-	Scheduled July 2023
		Indirect Audit Activity	7	3	
TOTAL			52	19	





AUDIT PERFORMANCE




AUDIT	COMPLETION OF FIELDWORK	DRAFT REPORT	FINAL MANAGEMENT RESPONSES	FINAL REPORT
Complaints Management	27 October 2022	1 November 2022	15 November 2022	16 November 2022
Freedom of Information	24 November 2022	25 November 2022	6 December 2022	6 December 2022
Staff Wellbeing	16 December 2022	16 January 2023	27 January 2023	27 January 2023

On average:

- All reports were issued in draft within 10 working days of completion of our fieldwork and a debrief meeting with management.
- Final reports were issued within 1 working day of final management responses being received.

APPENDIX I - DEFINITIONS

LEVEL OF ASSURANCE	DESIGN of internal control framework		OPERATIONAL EFFECTIVENESS of internal controls	
	Findings from review	Design Opinion	Findings from review	Effectiveness Opinion
Substantial 	Appropriate procedures and controls in place to mitigate the key risks.	There is a sound system of internal control designed to achieve system objectives.	No, or only minor, exceptions found in testing of the procedures and controls.	The controls that are in place are being consistently applied.
Moderate 	In the main there are appropriate procedures and controls in place to mitigate the key risks reviewed albeit with some that are not fully effective.	Generally a sound system of internal control designed to achieve system objectives with some exceptions.	A small number of exceptions found in testing of the procedures and controls.	Evidence of non compliance with some controls, that may put some of the system objectives at risk.
Limited 	A number of significant gaps identified in the procedures and controls in key areas. Where practical, efforts should be made to address in-year.	System of internal controls is weakened with system objectives at risk of not being achieved.	A number of reoccurring exceptions found in testing of the procedures and controls. Where practical, efforts should be made to address in-year.	Non-compliance with key procedures and controls places the system objectives at risk.
No 	For all risk areas there are significant gaps in the procedures and controls. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Poor system of internal control.	Due to absence of effective controls and procedures, no reliance can be placed on their operation. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Non compliance and/or compliance with inadequate controls.

Recommendation Significance	
High 	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
Medium 	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.
Low 	Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.

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