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Audit Report	Audit Reference	Original Recommendation	Priority	Management Response	Agreed	To Be Actioned By	No Later Than	Progress	High Priority	Medium Priority	Low Priority	Considered Complete by Owner	Partially Completed	
IT Network Arrangements	2021/05	R3 Tools such as network IDS / IPS of SIEM should be placed on the network and configured to monitor traffic for unusual or malicious incoming and outgoing activity that could be indicative of an attack or an attempted attack. Alerts generated by the system should be promptly managed by the Digital Services team.	3	The College acknowledges this recommendation. The College will explore the feasibility of the implementation of SIEM and IDS solutions.	Yes	Director of Digital Services	30-Apr-22	The ICT team has implemented a Zero Trust methodology to provide the network with intrusion detection (IDS) and intrusion prevention (IPS). This will mitigate unwanted lateral movement between systems and detection malicious code. Three SIEM solutions have been investigated, all including a managed service to provide expert threat analysis. Cost managed SIEM solutions have proven prohibitive and not financially sustainable, with the exception of the JISC service. The JISC service is due to commence August 2023, and the college is actively engaged in determining technical specifications and final costs. ~~Revised completion date: 31-January-2023-~~ ~~Revised completion date: 31-July-2023-~~ The Director of Digital Services has now received quotes and these are being reviewed. A decision will be made imminently and this action concluded. Note revised completion date. Partially completed. ~~Revised completion date: 30-September-2023~~ Quotes for SIEM solutions had to be further reviewed due to the overall product and services costs. The department has a tight budget and a compromise has been reached to reduce the scope of the proposed solution. Once the quote clears procurement, implementation will commence. Update as at 12 February 2024 A purchase order has been realised for a SIEM solution which will be implemented over the next month. ~~Revised completion date: 30-November-2023~~ 31 March 2024 Update as at April 2024 - COMPLETE SIEM solution purchased. Onboarding and configuration process started with supplier. System will be monitored over the coming months and adjusted as necessary to ensure security reports add value to the College cyber-security posture. Fully implemented.			1	Yes		
Student Activity Data	2022/11	R1 The College should ensure that programmes and students are correctly classified as full-time or other in line with the Credits guidance.	3	Where appropriate the MoA of the class will be amended to reflect the Credits being allocated for the planned learning of the student, instead of amending the MoA of the student at student enrolment level.	Yes	Head of Student Information Services	Throughout 2022/23	Block Release classes with credits due to be >15 were given the MOA 17 at class level, instead of 06. All students enrolled in these programmes would attract the same credits as they are following one programme. Part time classes were left at 08 at class level and any student with credits >15 were amended at enrolment level. Enrolments to part time classes can attract various credit amounts. The SFC Error reports are used to ensure that none of these are missed. Examples of both have been uploaded onto the HL portal. Fully Implemented.			1	Yes		
Student Activity Data	2022/11	R2 Review the checks carried out at course set-up to ensure that Credits claimed agree to SQA (or other awarding body) credit rating or planned learning hours/40.	3	Head of SIS will ensure that Student Records closely monitor the setup of non-modular activity based on the SQA principle of planned learning hours for a unit. Additionally, Student Records staff will be reminded to ensure that unit Credits and FES2 Planned Credits need to match to ensure the accuracy of the Credit claim	Yes	Head of Student Information Services	Throughout 2022/23	Non-Modular policy had been uploaded on the HL portal which explains the principle that is followed by the Student Records team. Fully Implemented.			1	Yes		

Environmental Sustainability	2023/01	R1: We recommend that the College establishes a network of Sustainability Champions who can help share good practice and help staff become aware of initiatives happening within the College or wider sector etc.	3	A similar approach has been adopted for the Data Protection Privacy Network across the College and this works very well.	Yes	Director of Estates and Corporate Services/Head of Facilities and Environmental Sustainability and Environmental and Sustainability Manager	Jul-23	Update as at 20 March 2023 The Environmental and Sustainability Manager has communicated with all College staff in relation to establishing a network of Sustainability Champions. This will be further discussed at the Estates and Sustainability Working Group meeting at the end of March 2023. Positive response from staff to date. Update as at 15 June 2023 Environmental Champion Group established and first meeting held. Fully Implemented.			1	Yes	
Environmental Sustainability	2023/01	R2: We recommend that the College ensures that all its strategies take cognisance of its sustainability and climate change objectives and ambitions. This will help embed sustainability and carbon management throughout the whole of the College	3	Strategies will be reviewed at next review dates and sustainability embedded as appropriate.	Yes	SMT	~~7/31/2024~~ 31 December 2027	Update as at 15 August 2023 The strategies will be reviewed at each review date and sustainability embedded at that time. Update as at 9 August 2024 The strategies in place at present have various review dates from 2024-2027; each one will be reviewed prior to the end date and sustainability and environmental matters will be embedded at that time. This is an ongoing recommendation and, as such, the revised completion date for this recommendation will require to be December 2027 in line with the current strategies. Revised completion date: ~~31 July 2024~~ 31 December 2027			1		
Environmental Sustainability	2023/01	R3: Ensure that adequate training is provided to Estates and Facilities staff on how to optimally configure the BEMS to allow the College to collect, interpret and report appropriate data on energy consumption.	3	Some training was given by Mitie prior to the COVID-19 lockdown period, however, the passage of time means that refresher training would be welcome and would also allow proper interrogation of the BEMS system in order that it can be used to maximum effect.	Yes	Head of Facilities and Environmental Sustainability/ Environmental and Sustainability Manager	~~7/1/2023~~ 31 October 2024	Update as at 15 August 2023 Due to the volume of estates works ongoing over the summer period to enable the exit of West End Campus, this training has not been possible to organise. Update as at 8 February 2024 Mitie has been contacted on several occasions this calendar year in an attempt to secure a date for this training. This is currently awaited. Contact made again on 7 February 2024. Revised completion date: ~~31 December 2023~~ 31 July 2024. 31 October 2024 We have been unable to secure the necessary training with Mitie and have very recently changed contractors who will provide what the College requires in terms of training and system reporting.			1		
Environmental Sustainability	2023/01	R4: We recommend that going forward the College includes a section on the covering paper to the reports being presented at the Board / Sub-Committee meetings relating to an assessment of the climate impact of the activity being reported. This will help focus people's minds on sustainability and carbon emissions. We also recommend that for any projects / initiatives a section is added to the new project process to include an assessment on the climate and sustainability of undertaking the project / initiative.	3	This section will be included as suggested.	Yes	SMT	Jul-23	This section has now been added to reports and agendas. Fully Implemented.			1	Yes	

Cyber Security	2023/01	R1: Ensure that a formal programme of refresher training is established for staff users with a risk-based approach adopted in identifying the frequency of refresher training requirements.	3	Our current cyber security training module is available for all staff, but is not required to be repeated periodically. This will be reviewed. Training workshops will be considered along with simulated cyber-attack exercises and follow-up training, to ensure staff have every opportunity to refresh their knowledge.	Yes	Director of Digital Services	Jul-23	Update as at 15 August 2023 The current cyber security module is being reviewed to to ensure it is up-to-date and how it can be presented as a refresher package to those staff who have already completed it. Training has been provided at the staff CPD day in March and August 2023 which will continue for future staff CPD sessions. Training is also part of the simulated email phishing exercise, providing short, relevant training aligned with the specifics of the campaign. Partially Implemented Revised completion date - ~~31 October 2023~~ A new cyber security module has now been identified and is currently being tested for suitability. After testing a proposal will be tabled to Senior Management, including a schedule for repeating the training. Revised completion date - 15 January 2024 Update 30 January - Complete Online training module now set to be repeated every two years by staff, using Workrite. Fully Implemented.			1	Yes	
Cyber Security	2023/01	R2: Ensure that departmental compliance rates for completion of the cyber security training are communicated to departmental line mangers and instances of non-compliance are followed up. Potential barriers to completion of the training should be investigated and remediated.	3	An initial drive to increase the cyber security training completion rate will be undertaken. Thereafter, ongoing monitoring of compliance will be linked in with recommendation one of this report, to ensure departments are aware of non-compliance.	Yes	Director of Digital Services	Jul-23	Update as at August 2023 Current completion rate for training module stands at 75% of staff. Work is ongoing to increase those completing the module. Revised completion date - 31 October 2023. Complete - completion rates have increased to 88.4% of staff, rising from 71.1% when reviewed at audit (Jan 2023). Communication of cyber security training module has been through all staff CPD events and emails when alerting staff to cyber incidents. Fully Implemented.			1	Yes	
Cyber Security	2023/01	R3: A Cyber Incident Response Procedure should be communicated to all relevant staff and stakeholders to ensure that everyone's roles and responsibilities are defined and understood. This should then be supported through appropriate training. The response procedure should then be practised to ensure staff know how to respond during a cyber security incident, and to also highlight any potential weaknesses or gaps in the planned response. Practises should also include restoring systems and files from backups to ensure that recovery times and recovery points can be achieved.	3	A simulated large scale cyber incident exercise will be challenging and will affect day-to-day operations. However, a plan for both paper-based practice and live scenarios will be prepared on a sufficient scale to test our incident response, including data recovery from backup systems.	Yes	Director of Digital Services	Jul-24	Complete. Table-top exercises (TTX) have been conducted within the ICT team and facilitated by our HEFESTIS CISO or by internal staff. The Cyber Incident Response Plan forms part of the TTX. In June 2024, a wider TTX was performed involving a number of key staff from across the College to test our response to a cyber-attack. This TTX was paper-based and not 'live', as the disruption caused would significantly impact College daily operations. The TTX did provide useful intelligence to further strengthen our procedures and responses. In addition to the TTX, a large scale testing to restore our server infrastructure also took place, with over 100 servers restored from backups. This tested our ability to restore data, the integrity of the backups and the time it would take to complete each restore. Fully Implemented.			1	Yes	
Cyber Security	2023/01	R4: Establish mandatory requirements within procurement procedures for relevant suppliers to provide evidence of current cyber security certifications. Also ensure that relevant suppliers provide copies of recertifications when these are due.	3	Director of Digital Services to work with Procurement Manager to establish best method of including cyber security arrangements within the procurement procedures.	Yes	Director of Digital Services / Procurement Manager	1/1/2024 ~~30 June 2024~~ 1/1/2025	Work has begun with APUC to introduce cyber security requirements into the standard contractual terms and conditions for the College. The HR and Finance systems will be the first contracts to be piloted. Update as at 12 February 2024 Questions sets from APUC and HEFESTIS Shared Service have been provided and are currently being reviewed to determine best-fit for GKC internal processes. Work with procurment ongoing. Update as at May 2024 Draft procedure has been written to include cyber security questions for suppliers and a process for requesting cyber security certificates on a regular basis. Procedure still to be tested with a new contract. Work ongoing. Revised completion date: ~~January 2024 31 March 2024~~ 1 January 2025			1		Yes

Student Activity Data	2023/08	R1 The College should ensure that work-based learning students who are not continuing to participate in their agreed programme are identified on a timely basis by curriculum staff and notified to the Student Information Services team to ensure that they are removed from the Credits claim as appropriate.	3	This was due to teaching staff withdrawing at unit level and not withdrawing the student at class level. Staff have been reminded of the system in place. However, the Head of Student Information Services has put in place an end of block review to ascertain the status of the students within these classes. This will ensure that students who are no longer continuing are withdrawn and removed from the credit count.	Yes	Head of Student Information Services	Throughout academic session at the end of each block, but by July 2024.	January 2024 Update: End of block review has been introduced for work based learning classes. Head of Student Information Services supplies faculty staff with a list of “Live” students, who confirm that the students are or are not still engaging in the class. Block One has been completed and information updated. Further reviews will be conducted as blocks 2 and 3 end. Partially implemented. August 2024 Update Complete – emails listing the live students with MOA11 were issued at the end of each block to the relevant Curriculum Manager. These lists were update to ascertain who was no longer engaging in the course. Where any student was no longer engaging they were withdrawn and removed from the credit. Fully Implemented.			1	Yes	
Student Activity Data	2023/08	R2 Ensure that Credits for non-accredited work placement units are calculated in line with the College’s procedures, which reflect the SFC Credits guidance.	3	This was due to an error in removing 1 credit instead of 2 from the calculation of the Work with Communities work placement calculation. All classes have now been double checked and paperwork confirming the placement hours and unit involved are on file.	Yes	Head of Student Information Services	31/10/2023	January 2024 Update: Head of Student Information has double checked all Work Placement calculations for academic session 23/24 and has back up documentation on file to provide further detail if required. Fully Implemented.			1	Yes	
Corporate Planning	2024/04	R1 The key steps and timescales for the development and review of the College Strategic Plan should be documented, as well as each stage of the wider Corporate Planning process.	3	A Corporate Planning timetable will be created, shared with College Management and published on the College intranet.	Yes	Vice Principal Operations & Vice Principal Curriculum & Quality	5/31/2024 08/31/2024	Update as at 26 August 2024 A Corporate Planning Timetable has been produced and this is being discussed at SMT at present. Revised completion date: ~~31 May 2024~~ 31 August 2024			1		Yes
Staff Development	2024/05	R1 It is recommended that the College develops a centralised comprehensive training record to ensure that all formal training information is recorded in a single place and to allow for more efficient management oversight.	3	The College is in the process of further developing its HR platform to support its OD function. This will enable the recording of formal training and mandatory training to be held in a central location. It will be accessible by the staff member and the line manager. In addition, the site will link the staff member to the Professional Learning Log pro format which is voluntary, and staff will be encouraged to utilise this for their own self-reflection and professional development.	Yes	Director of People and Culture and Head of HR and OD	31/12/2024	The College is currently working on developing CintraHR to develop the platform for professional development. We would anticipate that the framework for the approach will be developed by 31/12/24 and trialled prior to rolling out in session 2023/24 for use in 2024/25			1		
Staff Development	2024/05	R2 It is recommended that the requirements for training during inductions and probationary periods is refined to explicitly define the timescales for completing the compliance training elements, to ensure consistency in the approach adopted across the College.	3	The induction process is currently under review. Timescales for completion will be incorporated as part of the review process.	Yes	Director of People and Culture and Head of HR and OD	31/12/2024	The College is currently developing a College level induction framework and assessing platforms for its induction process to sit on. It is anticipated that the framework will be completed by 31/12/24 with additional elements being created on an ongoing basis. The College is considering how CintraHR might support its induction process too.			1		
Risk Management	2024/02	R1 - Risk management training for new Board of Management members should be incorporated into the induction checklist for any new Board members.	3	While Risk Management is covered as part of the Governance discussion, this recommendation is accepted and Risk Management will be formally added to the induction session/checklist for any new members.	Yes	Secretary to the Board of Management and Director of Estates and Corporate Services.	31/05/2024	Update as at 1 May 2024 Risk Management training has been offered to all Board members and a session was held on 18 April 2024 on Risk Appetite. Risk has been incorporate more fully into the Induction checklist for new Board members. Fully implemented.			1	Yes	

Risk Management	2024/02	R2 – The College’s risk appetite for each of the identified risk categories should be formally sense checked annually by the Board of Management. This annual review should be defined within the Risk Management Framework procedures.	3	The intention was always that Risk Appetite would be reviewed regularly. Unfortunately this was omitted in 2022/23 due to the significant volume of papers being considered by the Board and Committees. Therefore this recommendation is accepted and an annual check of the Risk Appetite by the Board of Management will now be conducted. The Risk Management Framework will also be amended accordingly.	Yes	Secretary to the Board of Management and Director of Estates and Corporate Services	~~7/31/2024~~ - now 30 November 2024	Update as at 1 May 2024 Risk Management training on Risk Appetite was conducted by Henderson Loggie on 18 April 2024 and will be fully discussed at the May 2024 Audit & Risk meeting and the June 2024 Board of Management meeting. The work on the Risk Management Framework will be fully completed upon the conclusion of the Risk Appetite matter at the Board of Management meeting. An annual check of the Risk Appetite by the Board of Management has been added to the annual planner so that this is not missed. Partially implemented. Update as at 21 May 2024 The Risk Appetite/Category Session will be carried out at the August 2024 Board of Management meeting. Change in time approved by Chair of the Board of Management. Update as at 16 July 2024 The Risk Appetite/Category Session has been moved to the October 2024 Board meeting as the August Board agenda is too busy.			1		Yes
Risk Management	2024/02	R3 – The naming convention used to describe risk scoring categories and scoring categories (such as likelihood and impact) should be made consistent across risk management documents, including risk registers. The Impact Scoring table in the Risk Management Framework (December 2021) should also be enhanced to incorporate financial impacts, as well as non-financial impacts, to enhance the assessment of impact scoring.	3	This recommendation is accepted and the naming convention will be aligned for added clarity. Liaison will take place with Board, SMT and Risk Management Committee members in relation to the Impact Scoring Table to enable wider views to be heard in this regard.	Yes	Vice Principal Operations and Director of Estates and Corporate Services	7/31/2024 30 November 2024	Update as at 1 May 2024 Risk Management training on Risk Appetite/Risk categories was conducted by Henderson Loggie on 18 April 2024 and will be fully discussed at the May 2024 Audit & Risk meeting and the June 2024 Board of Management meeting. A further session will be scheduled with Team Risk Register owners in order that there is full alignment. Work on this recommendation is currently ongoing. Partially implemented. Update as at 16 July 2024 Further training will be carried out with Team Risk Register owners after the Board session in October 2024.			1		Yes
Risk Management	2024/02	R4 – In line with good practice, the College Risk Register should be enhanced by the addition of columns which align the individual risk to the strategic objective that it impacts upon.	3	This recommendation is accepted and additional column(s) will be added.	Yes	Vice Principal Operations and Director of Estates and Corporate Services	7/31/2024 30 November 2024	Update as at 1 May 2024 A column on the Strategic Objective that the various risks align to has been added and this work will be presented to the Audit and Risk Committee for their views and thereafter the Board of Management. Partially implemented. This will be fully finalised in November 2024 following the Board of Management meeting in October 2024.			1		Yes
Systems Development / Implementation	2024/06	R1 - A suite of systems development project documents should be developed, as outlined in this report, and summary guidance for staff should be created which describes the College’s approach to project management. Guidance should outline: the methodology to be adopted; in what circumstances the methodology should be applied; the governance arrangements and standard documentation which should be prepared and retained (including outline business case; PIDs; system and user specifications; project plans; testing; and post-implementation reviews). Guidance should be included which clearly states the College’s role in project management where an external agent leads the project delivery. The methodology should suit the type of project, for example waterfall \ PRINCE 2 for infrastructure-based projects and Agile for digital projects. The key improvement opportunity is to develop a robust benefits realisation plan, which will be based on metrics agreed as part of the business case and revisited after project delivery.	2	Agreed. A suit of project management documents will be produced to ensure a consistent and clear approach is adopted by the College when undertaking digital projects.	Yes	Director of Digital and Information Services	31/07/2025			1			