



King's College Council - 24 November 2020

MS Teams

24 November 2020 17:00 - 24 November 2020 19:30

King's College Council	
Meeting date	24 November 2020
Paper reference	KCC-20-11-24-02
Status	Final
Access	Public/Members and senior executives
FOI release	Subject to redaction
FOI exemption	None, subject to redaction for commercial interest or personal data



Meeting of the Council to be held on Tuesday 24 November 2020 at 17.00 on MS Teams

Agenda

1	Welcome, apologies and notices		Chair
2	Approval of agenda	KCC-20-11-24-02	Chair
3	Unanimous Consent Agenda (including: Minutes of the Previous Meeting; Away Day notes (RESERVED); Minutes of Special Council meeting (RESERVED); and Actions Log)	KCC-20-11-24-03.1 KCC-20-11-24-03.2 KCC-20-11-24-03.3 KCC-20-11-24-03.4 KCC-20-11-24-03.5	Chair
4	Matters Arising from the minutes Royal Brompton/KHP Framework Approval – May 2020 Minutes	KCC-20-11-24-04	Chair
5	Report of the Chair	Verbal	Chair
6	Report of the President & Principal <i>Items for Consideration</i>		
	6.1 Summary Report on Key Issues (to note)	KCC-20-11-24-06.1	President & Principal
	6.2 COVID-19 Update Overview (to note)	<i>Verbal Update</i>	President & Principal
	6.3 Southeast London Innovation Quarter (to discuss)	KCC-20-11-24-06.3	Prof Sir Robert Lechler/ Provost (Health)
	<div style="background-color: black; height: 1.2em; width: 100%;"></div>	KCC-20-11-24-06.4	SVP (A&S)
7	Reports of Committees		
	7.1 Finance Committee <i>Items for Consideration</i>	KCC-20-11-24-07.1	Honorary Treasurer & VP Finance
	(i) Financial Statements 2019-20 (to approve)	Annex 1	
	(ii) Update on 20/21 and 5-year Forward Plan (to approve)	Annex 2	
	(iii) KHP Joint Venture (to discuss) (RESERVED)		
	(iv) Revised Debt Strategy (to discuss)		
	(v) Update on Pensions (to discuss)		
	<i>Please see Consent agenda for the remaining items</i>		
	7.2 Joint Estates Strategy Committee and Finance Committee <i>Item for Consideration</i>	KCC-20-11-24-07.2	Chairs - Finance Committee & Estates Strategy Committee
	(i) Centre for Children & Young People's Mental Health (to approve)	Annex 1	

FIVE MINUTE BREAK

7.3	Audit, Risk and Compliance Committee <i>Items for Consideration</i> (i) External Audit Report and Management Letter of Representation (to approve) (ii) Annual Report of the Audit, Risk & Compliance Committee (to note) <i>Please see Consent agenda for the remaining Items</i>	KCC-20-11-24-07.3 Annexes 1 & 2 Annex 3	Chair, Audit, Risk & Compliance Committee
7.4	Academic Board <i>Items for Consideration</i> (i) Student Engagement and Satisfaction (to discuss) (ii) Portfolio Simplification update (to discuss) <i>Please see Consent agenda for the remaining Items</i>	KCC-20-11-24-07.4 Annex 1 Annex 2	President & Principal
7.5	Governance & Nominations Committee <i>Please see Consent agenda</i>	KCC-20-11-24-07.5	Chair, Governance & Nominations Committee
7.6	Estates Strategy Committee <i>Please see Consent agenda</i>	KCC-20-11-24-07.6	Chair, Estates Strategy Committee
7.7	Fellowships & Honorary Degrees (<i>RESERVED</i>) <i>Item for Consideration</i> (i) Petition to rescind a Fellowship (to discuss) <i>Please see Consent agenda for remaining items</i>	KCC-20-11-24-07.7	Chair
7.8	Chairs' Committee <i>Please see Consent agenda</i>	KCC-20-11-24-07.8	Chair
7.9	Remuneration Committee (<i>RESERVED</i>) <i>Item for Consideration</i> (i) Annual Report of the Remuneration Committee (to discuss) <i>Please see Consent agenda for remaining items</i>	KCC-20-11-24-07.9	Chair, Remuneration Committee
8	Report of the KCLSU (to discuss) Report of the KCLSU President & KCLSU Sabbatical Officers Report (to discuss)	KCC-20-11-24-08	KCLSU President
9	Any other business		
10	Adjournment		

Lord Geidt
November 2020

King's College Council	
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Unanimous Consent Agenda

A consent agenda is a tool often used by organizations to deal expeditiously with routine matters and reports, leaving more time for more strategic discussions. The items on a consent agenda are expected to be non-controversial and unlikely to engender questions. The items on the consent agenda, whether for approval or information, are dealt with by a single motion to accept/receive for information all items contained in the consent agenda. Before taking the vote, however, the Chair will ask whether any member wishes to have any item removed from consent in order to ask a question or make a comment about it. In such a case, the item is automatically removed from the consent agenda and will be dealt with at the end of the meeting or within the report of the Committee under which it sits. The remaining items are then unanimously approved/received for information en bloc without discussion.

While approval of an omnibus motion saves time at meetings, members will want to review the consent agenda materials carefully in order that they properly discharge their responsibilities. Members may ask to have an item removed from the consent agenda by so informing the Secretary or Chair at any time up until the motion is put.

Recommended: That the Council approve or note for information the items contained in the Unanimous Agenda, listed below.

Item	Title	Paper	Action
3.2	Minutes of 15 July 2020	KCC-20-11-24-03.2	Approve
	AWAY DAY notes (RESERVED)	KCC-20-11-24-03.3	Note
	Minutes of 29 September 2020 (RESERVED to non-Executive members only)	KCC-20-11-24-03.4	Approve
3.5	Actions Log	KCC-120-11-24-03.5	Note
Report of the Finance Committee		KCC-20-11-24-07.1	
7.1	(i) Powers of Attorney and Execution of Deeds Policy	Annex 3	Approve
	(ii) Auditor's Management Letter		Note
	(iii) Staff Loans for the six months ended 31 May 2020		Note
	(iv) Severance Costs for the period to 31 July 2020		Note
	(v) College Endowment Funds Year Ended 31 July 2020		Note
	(vi) Capitalisation of Unexpected Income Accounts as at 1 August 2020		Note
	(vii) Fundraising report on the College's Tax Strategy 2020		Note
	(viii) Management Accounts P12		Note
	(ix) Annual Report on the College's Tax Strategy 2020		Note
	(x) Schedule of Insurances for 2020-20221		Note
	(xi) Research Awards		Note
	(xiii) Investment committee report		Note
Report of the Audit, Risk & Compliance Committee		KCC-20-11-24-07.3	
7.3	(i) Annual Statement regarding the Prevent Duty	Annex 3	Approve
	(ii) Annual Report of the Director of Business Assurance	Annex 5	Note

	(iii) Internal Audit Update		
	(vi) Compliance report		Note
	(vii) Enterprise Risk Management update		Note
	(viii) Risk presentation and discussion:		Note
	a) The International Strategy	Annex 6	Note
	b) Brexit risk management	Annex 7	
	c) Cyber-security risk management	Annex 8	
	(ix) Terms of Reference minor amendments	Annex 9	Approve
Report of the Academic Board		KCC-19-11-26-07.4	
7.4	(ii) Annual OfS Registration report		Approve
	(iii) Degree Outcome Statement		Approve
	(iv) HR Excellence in Research Report and Academic Plan		Approve
	(v) COVID-19 Update – Education Strategy		Note
	(vi) Academic Strategy – 2020-2021 assessment		Note
	(vi) Academic Strategy (Research) Update		Note
	(vii) Digital Education Policy		Note
	(viii) MNurs proposal		Note
	(ix) DCLinDent Proposal		Note
Report of the Governance & Nominations Committee		KCC-20-11-24-07.5	All to Note
7.5	(i) Committee Memberships		
	(ii) Change to an Ordinance - ESC		
	(iii) Governor Liability and Indemnification		
	(iv) Reflections on the Council Away Day		
	(v) Academic Board Elections		
	(vi) CUC HE Code of Governance		
	(vii) Council Composition		
Report of the Estates Strategy Committee		KCC-20-11-24-07.6	All to Note
7.6	(i) Children and Young Persons building project		
	(ii) General Overview of Estates & Facilities		
	(iii) Blended online/physical interface		
	(iv) Champion Hill Update and Remediation		
	(v) Campus Masterplanning Update		
	(vi) Estates Capital Working Group		
	(vii) St Thomas' Campus – Update on GSTT Strategy		
	(viii) King's Residences Demand and Supply		
Report of the Fellowships & Honorary Degrees Committee (RESERVED)		KCC-20-11-24-07.7	
7.7	(i) Nominations for Honorary Degrees		Approve
	(ii) Nominations for Honorary Fellowships		Approve
	(iii) Nominations for Fellowships		Approve
Report of the Chairs' Committee		KCC-20-11-24-07.8	Note
7.8	(i) SUSTech		
	(ii) Pay Freeze Update		
	(iii) USS Pension Consultation		
Report of the Remuneration Committee (RESERVED)		KCC-20-11-24-07.9	Note

See published minutes from the previous meeting [here](#)

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FOI exemption	Redaction subject to s.43, commercial interests or s.40, personal information



Actions Log

Action required

- ☐ For approval
- ☐ For discussion
- ☒ To note


Executive summary

Council is asked to note the action taken following discussions at previous meetings.

Actions Log

Meeting	Minute	Topic	Decision for Action	Actions	Owner	Progress
<i>July 2020 Council Meeting</i>						
15.07.20	6.1	Principal's report	Noted that the Student's Mental Health Strategy was to be refreshed	Scheduled for the January meeting of Council	VP (Education)	In progress
15.07.20	6.1	Principal's report	NSS – Noted that there would be a further report early in the new academic year and a further fundraising report on NSS areas	Updated NSS report (and an updated Fundraising report on NSS areas)		In progress
<i>January 2020 Council Meeting</i>						
30.01.20	06.1	Champion Hill	Detailed investigation to be overseen by the Chairs of ARCC and ESC	ARCC and ESC Chairs to monitor the investigative process	College Secretary	Ongoing
30.01.20	06.3	OfS – Access & Participation	Briefing on the nature of the requirements for reporting purposes to be scheduled for Council members	Schedule a briefing	College Secretary	In progress – to be included in detailed report on compliance matters for January 2021 Council meeting
<i>November 2019 Council Meeting</i>						
26.11.19						
<i>September 2019 Council Meeting</i>						
25.09.19	5.2	Update on College Statutes	Proposed Statute amendment as approved by Council to be submitted to the Privy Council for final approval	Waiting for advice from the OfS	College Secretary	In progress – waiting for advice from OfS
25.09.19						

Xan Kite
 Director of Governance
 November 2020

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FOI exemption	None, subject to redaction for s.43, commercial interests; or s.40, personal data	

Principal's Report

Action required

- ☐ For approval
☐ For discussion
☒ To note

Executive summary

The report outlines key current issues for the attention of Council.

Principal's Report

Executive summary

President & Principal

The announcement about Professor Shitij's Kapur's appointment as the incoming President & Principal and the interim arrangements under Professor Evelyn Welch was made on 27 October both internally to staff and students and to key external stakeholders. I will provide more detail on the transition arrangements at the meeting.

Coronavirus update

The university continues to manage the risks and impact of coronavirus. Our primary concern is staff and student wellbeing and there are a host of resources on the King's website explaining the measures we have taken and our collective responsibilities.

We have a Gold incident response team in place and have moved from management through a CV Co-ordination Group to a more business as usual approach through SMT. The Return to Campus Working Group has completed its excellent planning work and been disbanded and replaced by a Safe Campus Operations Team (SCOT), which acts as the Silver Incident Team as events arise. At the time of writing we have already handled a number of COVID outbreaks mostly within student residences and are monitoring likely internal and external scenarios as these evolve and refining our plans and resourcing accordingly. The main focus for the current period is to support our students and staff during the new national lockdown and to prepare for them to be able to travel home at Christmas where possible. A fuller update is on the Council agenda.

Admissions Update

The latest student enrolment figures as at 16 October (see **Appendix 1**) show that almost 32,000 student FTE are currently enrolled, this represents a positive variance to target of just over 1,200 FTE with further intake points for PGT and PGR still to come. Current enrolments are above target for both Home and Overseas students. At a faculty level, seven of the nine faculties are above target. The only exceptions are FoLSM and A&H. Three faculties have exceeded the target significantly – KBS (+430), NMS (+390) and SSPP (+340 FTE)

League Tables

Times Higher University Rankings 2021

King's placed 35th in the latest THE World Rankings, an improvement by one position from the previous year and retained the 7th UK ranking. Over 1500 institutions worldwide were included this year, up by 133 compared to last year. This league table criteria includes:

- international outlook – proportion of international students, staff and collaborations
- research – covers results from THE Academic Reputation Survey, research income per academic and the number of publications scaled for institutional size and normalized per subject
- citations – average number of times a university's published work is cited, covering publications between 2015-2019 and citations from 2015-2020

- teaching - covers the learning environment and looks at the proportions of PhD awards vs staff, PhDs vs Bachelors, Income per Staff, a student staff ratio measure and the results from the THE Academic Reputation Survey.
- industry income – research income an institution earns from industry scaled against the number of academic staff

Times Higher University Subject Rankings 2021

The Times Higher also publish international subject level rankings based on the same criteria as above and King's is ranked in :

Subject Area	Rank	Change
Clinical, pre-Clinical & Health	16 th	Up 1
Law	23 rd	No change
Life Sciences	36 th	Down 1
Arts & Humanities	26 th	Down 2
Education	23 rd	Down 5
Computer Science	95 th	Down 16
Social Sciences	54 th	Down 16
Psychology	11 th	n/a

Guardian

King's ranked 42nd in the latest Guardian University Guide an improvement of 21 places. Our position within the RG has improved by three places. The main cause of the improvement has been the change of the 'Careers after six months' metric in which we ranked 19th to a 'Career after 15 months' metric in which we ranked 6th. Three other measures saw an improvement – continuation, SSR and Spend per Student. The subject level tables are shown below. We are ranked in the top 10 in six subjects.

Guardian Subject Group	2021 Rank	2020 Rank	Year on Year Change
Psychology	2	11	9
Politics	5	10	5
Anatomy & Physiology	6	9	3
Law	6	12	6
Media & Film Studies	9	16	7
Philosophy	9	32	23
Economics	12	10	-2
Dentistry	15	8	-7
Modern Languages & Linguistics	15	16	1
Music	16	36	20
Religious studies and theology	20	23	3
English & Creative Writing	21	22	1
Classics & Ancient History	22	21	-1
Sociology	22	29	7
Biosciences	23	34	11
Chemistry	29	26	-3
Business, Management & Marketing	30	31	1
Medicine	31	32	1
History	34	42	8
Pharmacy & Pharmacology	35	36	1
Geography & Environmental Studies	41	50	9
Health Professions	41	37	-4
Computer Science & Information Systems	43	38	-5
Physics	45	39	-6
Nursing & Midwifery	49	61	12
Mathematics	55	61	6
Engineering: Electronic & Electrical	60	54	-6

Other updates (Annexes)

- I. Staff update
- II. Estates update
- III. HE environment
- IV. King's Health Partners
- V. Health & Safety update
- VI. Fundraising & Supporter Development
- VII. Degree Outcomes Data

Ed Byrne
 President & Principal
 November 2020

Staff Update

SVP Health

Professor Richard Trembath has taken up the role of SVP Health following Robert Lechler's retirement. Richard will also act as Executive Director King's Health Partners and remain Executive Dean of FoLSM supported by Ian McFadzean as Deputy Dean.

VP Service

Professor Bronwyn Parry has been appointed interim Vice Principal (Service) from 1 September and will steer the Service strategy for a period of six months.

Director, SPA

Bronwyn Parcell has been appointed permanent Director of Strategy, Planning & Analytics after undertaking the role on an interim basis for the past year.

Executive Director, SED

Darren Wallis has been appointed permanent Executive Director of Students & Education after undertaking the role on an interim basis since January 2020.

Executive Dean, Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care (FNFNM&PC)

Professor Irene Higginson has been appointed Executive Dean of FNFNM&PC from January 2021 to succeed Professor Ian Norman. Irene has a world leading reputation in the field of palliative care, applied health care and outcomes research. She is active in education and teaching and has extensive experience in leading and delivering national and international multidisciplinary collaborations. She is a Fellow of the Academy of Medical Sciences, an NIHR Senior Investigator (Emeritus) and was listed in the Highly Cited Researchers List from the Web of Science Group 2019 (scientists in the top 1% in their field in the world by citations).

Executive Dean, DPSoL

Professor Gillian Douglas has decided to step down from her position as Executive Dean of the Dickson Poon School of Law in December 2020 for personal reasons. Since 2017, when Gillian took up her appointment, DPSoL has cemented its position as one of the largest, most international and highly regarded UK university communities for legal research and education. It has moved steadily upward in global and national league tables: 15th in the world, 4th in the UK in the QS World Rankings this year. The School's research is increasingly marked by the winning of highly prestigious Fellowships, prizes and grants, with particular success in British Academy competitions. Its teaching has seen significant improvements in the NSS, while PTES and PRES scores have been consistently outstanding.

Given this period of unprecedented change and the announcement of the new President & Principal we have chosen to pause the search for the permanent Executive Dean and focus on a 12 month interim appointment to the role to provide continuity to the School.

These pages have been redacted

King's Health Partners Update

- The King's Health Partners **Annual Conference** took place on 13 and 14 October. Professor Sir Edward Byrne welcomed delegates and Professor Richard Trembath formally launched our [new five-year plan](#) – '[Delivering better health for all through high impact innovation](#)'. A broad range of speakers from academia, healthcare, community groups, and the wider public sector discussed how the plan will drive real benefit to our patients, communities, staff and students. For the keynote address we were delighted to welcome Dr Fiona Murray, Associate Dean for Innovation at the MIT Sloan School of Management and member of the UK Council for Science and Technology, who spoke about her experience launching a life sciences cluster in Boston. Dr Murray's talk considered how to create a framework for building innovation ecosystems, considering how we can bring together communities of stakeholders to foster socially inclusive growth, underpinned by a common purpose and informed by strategy as part of the cluster creation. Professor Robin Ali, Professor of Human Molecular Genetics, King's College London, also shared his work into eye gene therapy, looking at the development of novel therapies for eye disease. Additional presentations from King's College London included Prof Tim Spector on the COVID-19 Symptom Tracker App, Professor Sir Simon Wessely on pandemic mental health and wellbeing, and Prof Rick Iedema on workforce innovation and sustainability. Day two of the conference held numerous workshops focussed on each of the four themes of the plan. 642 delegates registered for the first day of the conference, and 540 for day two. [The video content is available to view on our website.](#)
- In early October King's Health Partners and the Department of Health and Social Care [announced that together with the London Testing Alliance we will be providing new COVID-19 testing capacity](#). The **London Testing Alliance**, set up by life science cluster MedCity, brings together world-leading universities, healthcare institutes, industry and pathology service providers to combine expertise to support the response to COVID-19. The Alliance will use untapped resources and build on existing infrastructure to offer at least 20,500 more COVID-19 tests a day by March 2021, with King's Health Partners providing 10,000 of that daily total.
- Joe Casey has been appointed as the **new Director of Partnerships and Programmes** for King's Health Partners, where he will lead on the implementation of our new five-year plan and expand national and international partnerships. Joe has worked for King's Health Partners for over five years, initially in a consulting capacity before becoming Deputy Director for Programme Delivery over three years ago.
- In the 12 months up to 31 July 2020 we have secured new research funding awards across health faculties totalling £177m. **Our recent awards** include BBSRC Strategic LoLa Grant in mechanobiology (£3.5m); Wellcome Investigator Awards to Jo Spencer, Corinne Houart, Snezhka Oliferenko; £1m for COVID-19 immunology programme (philanthropic); NHS CHECK awarded UKRI funding for national roll-out (mental health of healthcare staff), with an additional award specifically focused on BAME health workers (£1m total); £16m award to expand our AI Centre for Value-Based Healthcare ([funding allocated through NHS Trusts](#)).
- **King's Health Partners Clinical Academic Groups (CAG)** – on 21 October a webinar in the King's Health Partners Primary Care series took place. The session explored "the COVID response in south east London: What did we learn in wave one and what does this mean as we go forwards?". We also supported with benchmarking research performance for King's College London's Environment submission for REF 2021 (Unit of Assessment 3). This work cuts across multiple CAGs and Institutes, including Palliative Care, Dental, Pharmaceutical Sciences, as well as King's Health Partners Diabetes, Endocrinology and Obesity, and King's Health Partners Women and Children's Health.
- On 29 October 2020 we held our first **King's Health Partners Surgical Academy** workshop, led by Professor Prokar Dasgupta, our recently appointed Professor of Surgery. Convening surgeons across the partnership, the event had 81 participants and presentations from experts across a range of specialties, including surgical and interventional engineering; stem cells and regenerative medicine; clinical trials; vascular surgery; neuro-surgery; orthopaedics and transplantation.

- **King's Health Partners Mind & Body** – supported a successful bid to the King's College Hospital Charity (and NHS Charities Together) to part-fund a psycho-social team. This team would be based in King's College Hospital NHS Foundation Trust's critical care service. Consultant Connect has experienced the largest increase in the number of calls received since its launch in September. In September 55 calls were made and 20 answered, compared with 21 calls and 8 answered in the first week of October. To mark World Mental Health Day on 10 October, two blogs were shared - [befriending service acts as a lifeline for patients during the pandemic](#) and [how e-IMPARTS puts patients' best interests first – a clinician's perspective](#).
- **Education and Training at King's Health Partners** - the second series of "Meet the Expert" global clinical seminars began on 6th October with a presentation by **Dr Sophie Papa**, Clinical Reader in Immune-Oncology and Honorary Consultant Medical Oncologist at King's College London. Dr Sophie Papa's talk was titled "**Cancer Immune therapy in the Clinic**" and the seminar was chaired by Professor James Spicer, Professor of Experimental Cancer Medicine, King's College London, and Consultant in Medical Oncology, Guy's and St Thomas' NHS Foundation Trust. The presentations can be found on the King's Health Partners [Learning Hub](#). On 21st October a Safety Connections network event on patient safety and quality improvement was held, focussing on learning from staff experiences of COVID-19 and working in the Nightingale Hospital.
- The **Life Lines** team is continuing to work with hospitals across the UK to develop virtual visiting capabilities and prepare for the coming months. Following a grant from the Guy's and St Thomas' Charity, Life Lines is also developing a new programme to support patient recovery after COVID-19 long lengths of stay in intensive care. As of September 2020, 1,200 devices have been provided to more than 150 UK hospitals, allowing more than 40,000 virtual visits.

Health & Safety Update

SAFETY MANAGEMENT SYSTEM

Accident Management System (AMS)

Work continues on content and function development. In consultation with IT, it was decided that notification to AIRSWeb of contract termination would be delayed for 12 months given the very tight timescale and to have the new accident management system fully developed and functioning as needed and balancing this against demands on H&SS team with regards to COVID-19 pandemic.

Auditing

No change since the last report.

Occupational health

H&SS continues to liaise with KCH Occupational Health with regards to improvements to systems and processes associated with health surveillance for activities involving sensitisers, and in particular laboratory animal allergy.

The Individual Risk Assessment Guidance for staff and PGRs was revised during October by HR and H&SS to address end of furlough and return to campus, as appropriate, of individuals who are clinically extremely vulnerable. The guidance document now includes a record of the risk assessment outcome and agreed mitigations which can accompany a management referral to occupational health for specialist advice, as necessary.

Faculties have developed varied approaches to individual risk assessment for students returning to campus which need to be formally recorded, collated and filed with other Return to Campus processes during COVID-19. With regards to students who are clinically extremely vulnerable, indicative evidence is that some faculties have engaged more effectively with the university's OH services than others.

System Development

The Outbreak Plan produced by H&SS on behalf of Personal Health (Silver) which lists key stakeholders, collates existing written arrangements, describes communication processes with local authority public health teams and LCRC was submitted to Directors of Public Health. They responded positively with a limited number of minor comments. The Plan is being reviewed and revised based on the experience gained through responding to recent outbreaks.

Health & Safety Training and Compliance E-Learning

E-learning developed in response to COVID-19

H&SS authored a Welcome to Campus e-learning course in late August for students to familiarise them with COVID-19 mitigations on site and raise awareness of their role in our collective. Engagement with this e-learning course by taught students has been minimal and was raised with faculties via the Safe Campus Operations Team. 680 students have completed the course so far, an increase of 50% in the last seven days, which indicates that efforts have been made to reach out to students, but there is a long way to go.

3941 staff and PGRs have completed the Return to Campus E-learning first introduced for the pilot phase.

H&SS training programme

H&SS has recently undertaken a review of its training provision. Programmed face to face training will continue to be published through Skillsforge and provided via MS Teams where practicable.

The outcome of this review has identified that H&SS would like to expand its e-learning provision to include, for example, managers' responsibilities, accident investigation and laboratory safety. This would provide timely essential information to those who need it and facilitate workshop style face to face sessions for those who require further information and training. Completion of the appropriate e-learning course will be a pre-requisite for the workshops. This project is tied into the additional resource that the recently approved H&SS Business Case will provide.

With the arrival of the new Principal in summer 2021 and changes in senior management it would be advisable to refresh the knowledge of King's Senior Management Team with regards to their health and safety responsibilities. It is proposed that this is achieved through purchase of sufficient licences of the British Safety Council E-learning course "Health & Safety for Directors and Senior Managers".

SERIOUS INCIDENTS / INVESTIGATIONS

Health Surveillance

Health surveillance is identifying that there are some gaps in the local implementation of King's written arrangements for prevention and management of laboratory animal allergy which have been notified to the relevant managers. The Health Surveillance e-learning course introduced at the beginning of the summer is intended to raise awareness amongst technical and research staff of these new arrangements.

RIDDORs (reportable to Health & Safety Executive (HSE))

None since last report

Fire Safety

Evacuation marshal provision & building evacuation moving forward

Return to Campus during the COVID-19 has brought into sharp focus the on-going challenge of how to ensure that King's buildings and embedded areas are quickly and effectively evacuated in compliance with its legal responsibilities. HSMG has recently approved a new approach to evacuation provision and training at King's. H&SS and E&F Assurance are developing the new arrangements.

Fire Risk Assessments

An audit of King's Fire Risk Assessments and the Fire Risk Assessment process against the requirements of the Regulatory Reform (Fire Safety) Order and PAS 7 Fire Safety Management Standard will be undertaken by the competent persons for fire safety in H&SS and E&F Assurance. The audit report will be brought to HSMG in early 2021 and then to Council.

Champion Hill Update

All surveys for Champion hill have now been completed and passed to senior management for further consideration.

There are currently no sleeping occupants at Champion Hill.

Regulatory Visits and Enforcement

King's: HSE Enforcement

HSE investigation into the RIDDOR report of occupationally acquired asthma, commenced November 2019 and continues.

Outstanding actions relate to BSU Code of Practice publication, engineering controls and Occupational Health protocols.

Fees for Intervention have been issued for aspects of the inspector's investigation and the initial improvement notice has been published on the HSE enforcement register on the web. It is still unclear whether or not the investigation has been concluded. The focus continues to be on mitigation by ensuring that all actions are completed within the proposed target dates.

Secretary of State for Education: Fire Safety

See [Appendix A](#) for update report.

Communication and Consultation

Safety Notices

No change since last report

Infographics

H&SS is continuing to gather information regarding the existing PowerBI dashboards to show first aiders and evacuation marshals on site. It is currently working on PowerBI reports in relation to the self-isolation reporting to make the data collected more accessible and available to stakeholders.

Microsoft Teams & SharePoint

H&SS continues to use Microsoft Teams and SharePoint as its primary means of reaching stakeholders to raise awareness and collaborate on aspects of the university's arrangements.

Union Health & Safety Consultation

Consultation and communication with trade union safety representatives is primarily through Microsoft Teams where queries can be raised and addressed in a timely manner.

Risk Management & Assessment

Novel Coronavirus (COVID-19)

The H&SS team is providing advice to faculties and directorates on health and safety matters relating to COVID-19 and continues to contribute to the following working groups:

- Personal Health (Silver)
- Personal Health (Silver) Case Management Team
- Operational Management Team
- Safe Campus Operations Team

H&SS continues to manage and develop (in consultation with the Chair of Personal Health (Silver)) the Microsoft Form and associated Flow for individual reporting and oversight of trends relating to self-isolation. H&SS is currently seeking a temporary data analyst to assist with the data analysis and presentation to Silver Personal Health, and to develop further the PowerBI reports to assist with internal and external reporting requirements.

To date, a small number of limited outbreaks have occurred during October: 6 outbreaks have been reported from residences, 2 associated with teaching programmes and one associated with a KCSU social event. These have been managed in collaboration with key stakeholders (KCLSU, 3rd party residence management and faculties as appropriate) and reported to LCRC and Local Authority Public Health Teams who have offered advice and support as necessary.

The Acting Director and Head of Biological Safety are advising the King's testing project through membership of the Test Board and Test Management Committee respectively.

Health & Safety Services Staff Resource

The Deputy Director and Head of Infrastructure continue to act in the role of Director and Deputy Director.

A business case to expand and allow Health & Safety Services effectively fulfil its role as the university's competent persons and functional lead for advice and assurance in occupational health, safety and welfare has been approved.

Secretary of State Letter

Update on Actions & Next Steps

Background

Following the requirements established by the Secretary of State's letter, this short note outlines the steps taken to date to address key areas of concern relating to the management of fire safety, with particular focus across the residential stock as the incident in Bolton student accommodation was at the time a key driver to the SoS' request.

Actions to Date

The fire safety management system and arrangements set out the standards that the college has committed to in meeting legal requirements for fire safety and fire safety management. It details roles and responsibilities for fire safety management across the college. The introductory statement to SPR036 "Fire Risk Management Strategy":

"KCL is committed to developing a fire risk management system to provide an environment for all staff, students, visitors, patients, contractors and members of the public throughout KCL Campuses, and other sites within its control, in which the risk from fire to occupants is at an acceptable, low, level. The fire risk management system will also ensure that the risk of adverse environmental impact, property and business losses due to fire and its consequences will be kept at a level acceptable to KCL and its stakeholders."

This includes but not limited to:

- Undertaking Fire Risk Assessments
- Carrying out Fire Risk Assessment Reviews
- Minimising fire safety risks across faculties & directorates
- Undertaking internal audits against fire risk management standards

We continually monitor fire safety arrangements that are in place, our buildings are fire risk assessed, fire risk assessments are regularly reviewed. Fire risk assessment actions are tracked and monitored through a dedicated E&F fire risk management group that is empowered for the planning and securing of funding, to ensure that work towards reducing fire safety risks to the lowest practicable levels is maintained.

Since November 2019, when King's first responded to the SoS, King's has:

- Completed a thorough Due Diligence exercise across partner buildings that provide King's College students with accommodation, including temporary accommodations such as hotels.
- Undertaken fire risk assessments for derelict buildings under the responsibility of KCL, these first needed to be made safe for access
- Undertaken a review of current fire risk assessments to ensure that they remain fit for purpose
- Set up a fire safety task finish group within E&F to drive the close-out and management of fire risk assessment actions
- Employed an external 3rd party contractor to undertake remedial works for fire stopping and other works relating to fire risk assessment actions

- Moved evacuation marshal training to MS Teams to respond to Covid-19 challenges

Next Steps

Since the lockdown of the UK due to the COVID-19 Pandemic, Kings College London has had to review its position in addressing the risk of fire occurring as part of the phased return to campus. Although there is no requirement for a formal response to be sent to the SoS's office – it is understood that other universities are not looking to formally issue updates – it is proposed that:

1. H&SS and E&F continue to review current arrangements to meet a key element outlined in the Secretary's letter: a review of building and fire compliance in all university buildings that students use will be important for the peace of mind of students and their families. It is also important for the reputation of the HE sector as a whole.

This should include:

- a) A desktop review of the university's Fire Risk Management System, with E&F and H&SS fire specialists completing a gap analysis of the current arrangements to set out next actions such as key risks, policy review and communication, resource requirements etc.
 - b) Based on this gap analysis, the current Fire Safety Strategy is reviewed and updated, to include:
 - i) Changes to fire safety competent person roles in H&SS and E&F
 - ii) Responsibilities for fire safety within the H&SS and the Assurance Team should be clearly outlined, complimenting each other's function in a joint effort to reinforce King's College competent advice and assurance function for fire safety.
 - iii) Faculty and Directorate clients are required (as a project management gateway) to seek technical advice and support from the E&F Assurance Team regarding fire safety implications arising from a project.
 - c) Acknowledging the challenge with recruiting additional staff to support a more robust and pro-active approach to fire safety management, E&F and H&SS have agreed to develop a business case to engage a third party provider to support the teams with Fire Risk Assessments going forward. This approach is well embedded at other universities such as UCL and has already proved effective within King's with respect to the management of Legionella and Asbestos.
 - d) Plan and resource to address any gaps in compliance with King's fire safety management arrangements and any statutory responsibilities identified via 1(a) above and the findings from the Business Assurance review of Champion Hill. Increased transparency with regards to fire safety management is of paramount importance and the teams should aim at reporting on progress regularly via HSMG going forward, with evidence provided for comprehensive and easily accessible assurance.
2. A key requirement from the SoS is that the fire safety review includes input from an independent, third-party specialist in order to challenge arrangements and support establish a mechanism that allows for fire safety arrangements to be continuously reviewed and scrutinised. Linking this with item 1.c above can prove a significant step given current priorities and resource constraints.

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King's College Council	
Meeting date	24 November 2020
Paper reference	KCC-20-11-24-06.3
Status	Final
Access	Subject to Redaction
FOI exemptions	None, subject to redaction for commercial interest or personal data



South East London Innovation Quarter

Action required

- ☐ For approval
- ☒ For discussion
- ☐ To note

Executive summary

This paper presents the initial concept for a South East London Innovation Quarter.

Building on the progress made in the biomedical field at King's in the past decade, we now have an opportunity to establish a life sciences cluster, bringing commercial partners, with complementary skills, into a vibrant partnership with our Academic Health Science Centre, to generate health and wealth in our region. This is timely as the economy endeavours to recover, the health service to re-set, and the university sector secures its relevance and value in society.

This concept is presented to Council at this early stage in order to build awareness and provide the opportunity for early discussion and input. Any specific commitments with major reputational considerations and/or investment requirements will be subject to our usual business case gateways and risk assessments and consideration by Council's Finance Committee and/or Estates Strategy Committee. It is anticipated that the first significant investment would be in a senior development lead; this post would be co-funded by a number of partners.

The success of this venture depends on university commitment and engagement across multiple Faculties and disciplines.

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King's College Council	
Meeting date	24 November 2020
Paper reference	KCC-20-11-24-07.1
Status	Final
Access	Members and senior executives
FOI release	Subject to Redaction
FOI exemption	None, subject to redaction for commercial interests or personal data

Report of the Finance Committee

Contents	Meeting at which considered	Consent agenda	Council action
(i) Financial Statements Year Ended 31 July 2020 Annex 1	10 November 2020	No	Approve
(ii) Update on 2020-21 and Five-Year Forward Plan Annex 2	10 November 2020	No	Approve
(iii) King's Health Partners Joint Venture	10 November 2020	No	Discuss
(iv) Revised Debt Strategy	10 November 2020	No	Discuss
(v) Update on Pensions	10 November 2020	No	Discuss
(vi) Powers of Attorney and Execution of Documents Policy Annex 3	10 November 2020	Yes	Approve
(vii) Auditor's Management Letter	10 November 2020	Yes	Note
(viii) Interim Forecast Report to OfS	10 November 2020	Yes	Note
(ix) Other regular reports	10 November 2020	Yes	Note

To Approve

1. Financial Statements Year Ended 31 July 2020

MOTION: That Council approve the consolidated financial statements including agreement that the adoption of the going concern assumption in their preparation is appropriate.

Governance review of Financial Statements by Finance Committee

The Committee considered a substantially complete set of the financial statements¹ with no expectation of material changes to results or disclosures at its meeting on 10 November 2020.

The Committee noted that this had been a very challenging year for King's College London ("KCL"). As in previous years there have been certain accounting adjustments related to non-operating activity this year (material items are considered below). When considered on an Earnings before Interest, Tax, Depreciation, Amortisation & Pension movement basis, KLC's had earnings of £59.1m, up from £49.9m in the prior year

¹ The only exception at the time of the Committee meeting being the new Grant and Fee Income disclosure mandated by the OfS, the scope of which was still the subject of discussion across the sector and it noted that changes may be required as consensus is reached.

indicating a relative strengthening in underlying operating performance. Table 1 below highlights in summary manner the financial results.

Table 1: Summary of Financial Results

<u>All figures in £ millions</u>	2019-20	2018-19
Tuition fees and education contracts	428.8	393.8
Funding body grants	148.3	128.3
Research grants and contracts	200.6	194.7
Other income	165.5	163.9
Investment income	4.2	5.1
Donations and endowments	16.8	16.1
Total income	964.2	902.0
Staff costs	(562.7)	(512.6)
Other operating expenses	(342.4)	(339.4)
Earnings before Interest, Tax, Depreciation, Amortisation & Pension movement	59.1	49.9
Interest and other finance costs	(19.4)	(17.7)
Staff costs – movement on USS pension provision	116.0	(166.7)
Depreciation	(59.6)	(53.5)
Surplus/(deficit) before other gains/ losses	96.1	(187.9)
Other gains and losses	33.7	33.6
Surplus/(deficit) for the year	129.8	(154.3)
Unrealised surplus on revaluation of tangible assets	484.3	-
Total Comprehensive Income for the year	614.1	(154.3)

The final complete draft of the Financial Statements for the year ended 31 July 2020 is attached at Annex 1 and will be presented in detail to Council by the Interim CFO as required.

The Committee focused on several matters impacting KCL's results; the material items are summarised below for assessment/noting by Council:

Financial results

- (i) **Revaluation of land £484.3m²:** In 2019-20 KCL adopted a policy of revaluing freehold land to fair value. The Executive and their advisors believe that the fair value better reflects the true value of KCL's freehold land assets. The Finance and Audit, Risk & Compliance Committees concur with this management judgement. Freehold land was revalued to fair value as at 31 July 2020 by an independent Chartered Surveyor³. The fair value of land is based on either open market value (operational assets) or depreciated replacement cost (specialised assets). The Surveyor's report included a material valuation uncertainty statement regarding the impact of COVID-19 on property valuations but confirmed this does not mean the valuation cannot be relied upon.

² Estimated £484.3m increase in Total Comprehensive Income (no impact on surplus).

³ Gerald Eve, in accordance with the RICS Valuation – Global Standards (January 2020 edition) and FRS102.

- (ii) **Pensions £116m:** The Committee recognised that there continues to be significant uncertainty over the funding position and future contribution rates for the multi-employer USS pension scheme. KCL continues to be committed to seeking a sustainable funding solution for this, the largest pension scheme in contribution terms. Changes in the last year have resulted in a reduction in staff costs in 2019-20 of £116m compared to a cost of £(166.7)m in 2018-19 on the provision held for KCL's commitment to help fund the scheme's shared deficit. The reduction in the provision in 2019-20 relates to a more favourable funding plan having been agreed in October 2019 (2018 valuation) compared to that in place at the end of July 2019 (2017 valuation). A preliminary March 2020 triannual valuation of the scheme suggests an increase in the technical deficit on the scheme of anywhere from 2.7 to 5 times, and with the scheme trustee required to finalise the valuation and agree a new deficit funding scheme by 30 June 2021 the provision is expected to increase significantly again in 2020-21 with a large cost to KLC resulting. This valuation is not yet complete and so no revised deficit recovery plan has therefore been agreed; this will be the trigger for inclusion in employer accounts. The Committee draws Council's attention to the continuing uncertainty over the value of the scheme's technical deficit, and the contribution rates required to be managed present a significant challenge to medium to long-term financial planning and potentially industrial relations for the years ahead.
- (iii) **Asset Sale £34.7m:** The sale of the Canada Water site for £86.3m incl. VAT. £14m in April 2020, noting that the VAT has not yet been paid over to HMRC. The impact on the 2019-20 surplus is £34.7m.
- (iv) **Champion Hill £(29.0)m:** The closure of the Champion Hill residences in January 2020 and cost of rehousing/supporting students at c.£9m and charge to expenditure of £20m to reflect cost estimates of rectification of building.
- (v) **Other COVID related:** The financial impact of COVID from March 2020 included: furlough income of +£11.5m to July 2020; £8m loss of residences and trading fees as contracts allowed to be cancelled; reduction in expenditure of up to £20m due to building closure, travel, conference cancellations, deferral of staff recruitment; additional costs of PPE, space reconfigurations, closing and reopening buildings at c.£2m;.

Other matters reviewed for assessment/noting by Council:

- (vi) **Net Cash Flow and Forward Plans:** The Committee noted that the actions taken by KCL in response to the challenges of COVID-19 combined with significant growth in income driven by increased student numbers has resulted in a return to a cash generating position after a challenging year for cash generation in 2018-19. The total net cash inflow of £77.2m (£50.4m cash outflow 2018-19) includes cash generated from operating activities of £64.5m (£18.4m 2018-19). However, this overall positive cash flow has been significantly supported by £86.3m of cash received from the sale of property assets during the year, without which KCL would have posted a net cash outflow for the fourth successive year as the Executive have invested heavily in KLC's campuses to improve the student experience and provide world class research facilities. The operating cash generated in 2019-20 is just about at the level which the Executive considers sustainable long-term, but in this time of great uncertainty the Committee and the Executive are increasingly focused on KCL's ability to generate cash as a key measure of financial performance. Plans to address this are set out in the Forward Plan (see item 2 below) for Council, however the Executive noted that it was critical to ensure that KCL could invest in staffing, activity and infrastructure and build up funds to repay debts and address leasehold renewals within the next 10-15 years.
- (vii) **Going Concern adoption:** Going concern was an area of focus this year due to upcoming changes in audit requirements and the exceptional global economic climate prevailing. Senior KCL Officers, the Audit, Risk and Compliance Committee and Finance Committee have considered the going concern status of KCL: they have concluded that KCL is and will continue to be a going concern for the foreseeable future (defined externally as a period greater than 12 months from the approval date of

these financial statements). Collectively Senior Officers and the two Committees therefore recommend approval by Council that KLC's financial statements be prepared on a going concern basis. In KPMG's evaluation they considered the inherent risks to the Group's business model and analysed how those risks might affect KCL's financial resources or ability to continue operations over the going concern period. KPMG concluded that they have nothing to report in these respects.

(viii) **KPMG Opinion:** KPMG have stated that in their opinion KLC's financial statements: (a) give a true and fair view of the state of the Group's and the University's affairs as at 31 July 2020, and of the Group's and the University's income and expenditure, gains and losses and changes in reserves, and of the Group's cash flows, for the year then ended; (b) have been properly prepared in accordance with UK accounting standards, including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland, and with the 2019 Statement of Recommended Practice – Accounting for Further and Higher Education; and (c) meet the requirements of the Accounts Direction dated 25 October 2019 issued by the Office for Students. Furthermore, the Chair of Audit, Risk and Compliance Committee reported that the external auditors had given an unqualified opinion and that it was clear that the numbers could be believed, and that the quality of the production was high with very few adjustments and no disputed adjustments. The policy discussions had been quick and easy and material concerns and going concerns had all been dealt with very quickly.

2. Update on 20/21 and 5-Year Forward Plan

Motion: That Council approves the following:

- (i) The latest risk assessment and associated financial provisions;
- (ii) Implementation/re-instatement of the following pay measures recommended by the College's Executive:
 - a. New Graduate Teaching Assistant (GTA) terms and conditions c £2.5m
 - b. Clinical pay uplifts (backdated to April 2020) c£1.2m
 - c. Professorial increments subject to performance review. c£0.5m
 - d. Promotion (academic panels take place at the end of October and new pay based on promotion would start in January 2021) c£0.5m
 - e. Pay cut for Principal/SVPs/VPs c£0.2m

Together these total £5m and with an additional £1m contingency are included in the operating forecast. We have already reinstated and backdated (to August 19/20) spine point increments for our lowest paid staff and grade progression for those who have completed their PhD (est. £150k).
- (iii) A continuing pause on the capital plan to the next review point, the March 2021 meeting of Finance Committee, with the following three named exceptions where approval is sought *in principle* for the release of c£4m to maintain momentum and feasibility for these projects and also to allow a £1m contingency for essential kit and works which will be subject to separate approvals. Progression to be subject to gateway reviews which include financial reviews.
 - a. *Pears Maudsley Centre for Children and Young People* (CYP) – to invest £0.3m on approval of the Full Business Case to begin works, with KCL funds not required until March 2024. The Full Business Case was considered by RERC, Finance Committee and Council in October and November 2020. [See separate report of the Joint Finance and Estates Strategy Committees].
 - b. *London Institute for Healthcare Engineering* (LIHE) - to invest £2m to progress to FBC and undertake enabling works including Prideaux decant. Final spend decision Summer 2021.
 - c. *Quad (3 and 4)*, taking from shell and core to completion – to invest £0.7m to progress to final spend decision in June 2021. Decision to be taken in January 2021 following consideration by the Quad Programme Board, CAP and RERC.

The Finance Committee continues to view 2020-21 as an exceptional year in planning terms and the Interim Finance Plan approved in July 2020 would be subject to the present review and a further review in February 2021 to take account of the latest information, particularly in respect of student tuition fees, in a rapidly changing environment. Council had agreed in July that decisions around pay provisions and the affordability of the capital programme would be taken in November 2020.

The paper attached in **Annex 2** was considered by Finance Committee and its recommendations endorsed pending any further refinement in Quarter 1, 2021; key areas of focus by the Committee were:

- (i) Overall provisions which were considered prudent considering the current operating environment.
- (ii) Productivity savings and Savings where further attention is anticipated by the Executive.
- (iii) Free cash and expenditure days. While free cash remains a challenge, the Committee noted the improvements in the quality of cash flow forecasting this year and the availability of the revolving cash facility at £75m to further support short term liquidity needs. Further refinements where reasonable as prudent will be sought by Finance.

The overview of this paper will be provided at the meeting by the Interim CFO.

To Note/Discuss

3. King's Health Partners Joint Venture

The proposed joint venture agreement would see the establishment of a Med-Tech Joint Venture Company (JV) between King's College London (KCL), Guy's and St Thomas' (GSTT) and King's College Hospital (KCH) to create a Med-Tech ecosystem which will focus on the commercialisation of innovation opportunities. SLaM was also considering its involvement.

The objective is to improve the quantum and speed of translation research activities into clinical innovations that enhance patient care, outcomes and patient experience, whilst also ensuring financially viable investment decisions. The company's primary activity would be to support venture building from proof of concept through to innovation development, and ultimately a successful exit. The company would select high-impact, early-stage technologies spun out of the Founders and will attract independent start-ups and other businesses.

This final proposed Joint Venture Agreement had been reviewed by the newly formed executive Commercial Advisory Panel and RERC.

From a governance perspective, the Committee noted that an independent Chair would be appointed jointly by both parties with the King's Principal requiring to approve any candidate prior to appointment. The CEO would be Ben Soffer, already funded 50% by GSTT.

The Joint Venture was endorsed by the Committee and the SVP (QSI) will provide a brief overview.

4. Revised Debt Strategy

The Committee had approved a debt strategy in June 2020 which included a decision to defer seeking a Private Placement (PP) until late 2020/early 2021. The PP would ideally be long dated, £75-90-£100m, with best efforts to improve on the covenant package and there should be caution exercised in releasing any raised funding to be based upon business cases and the normal approval processes.

Work had now been undertaken with the advisers Quayle Munro and with input from NatWest Markets to obtain an initial view on alternative raising strategies (Private or possibly Public with retained element) and to understand the lending position and the markets view on HE.

Finance Committee agreed to establish a working group to seek to deliver c.£100m new debt in 2021 with long tenor (30years +) and to consider the Public/Private position to be taken and trade-offs between pricing, covenants, execution costs and ongoing costs. Finance Committee members, subject to availability will be Beatrice Devillon-Cohen, Nicky Richards, Philip Keller and Isabel Neumann all having considerable markets experience.

5. Update on Pensions

This section should be considered in conjunction with paragraph 1(ii) above. The Committee noted that the USS Pension Trustee had distributed materials supporting the initial stages of their March 2020 valuation and was consulting through UUK, as the Universities' representative, for views and comments from both Employers and staff in the process. The valuation of the scheme was complex, the timing difficult and the outline range of costs unaffordable as currently set out.

The Committee endorsed the principles set out by the Executive that should be at the heart of the scheme:

- A quality scheme able to attract and retain staff as part of King's remuneration package.
- A sustainable scheme, performing well, managed well and supported by the strength of its employers as a long-term prospect.
- A cost-effective scheme that can be afforded by both staff and King's.
- An accessible scheme, able to flex and transition with the needs of a diverse workforce through an individual's career path.

The consultation had been submitted by the Executive to UUK by the 30 October 2020 deadline following wide consultation across the College and consideration by the Chairs' Committee.

The USS pension scheme would be subject to revaluation at March 2020. Following discussion by the Committee it was agreed that given the complexities related to the valuation, the difficult timing and the unaffordability of the outline range of costs as currently set out, a dedicated teach in for Finance Committee members should take place before the next February meeting. It was also noted that from a governance perspective there were aspects of the scheme beyond those of a purely financial nature and therefore would need Council input prior to any decision making by KCL.

For Approval (on the Unanimous Consent Agenda and not for discussion)

6. Powers of Attorney and Execution of Documents Policy

Motion: That the revised Policy on Execution of Deeds, including the proposal to appoint Powers of Attorney be approved.

The proposed Policy on the Execution of Deeds, including the proposal to appoint Powers of Attorney is attached at **Annex 3**.

7. Auditor's Management Letter

Motion: That the External Auditor's Draft Years End Report and Management Letter for the year ended 31 July 2020 be approved.

The Management Letter is attached with the report of the Audit, Risk and Compliance Committee.

For Note (on the Unanimous Consent Agenda and not for discussion)

8. Forecast Return to the Office for Students

The Committee received the interim report on the Forecast Return and delegated to the Chair of the Committee authority to approve the final report which must be submitted in February 2021 prior to the Committee's next scheduled meeting.

9. Other regular reports

The Finance Committee receives a large number of regular reports. Copies of any of these reports may be obtained from the Secretariat. The following were noted at the meeting of 10 November 2020:

- 9.1 Staff Loans for the six months ended 31 May 2020
- 9.2 Severance Costs for the period to 31 July 2020
- 9.3 Student Debts written off over £10,000 during year ended 31 July 2020
- 9.4 College Endowment Funds Year Ended 31 July 2020
- 9.5 Capitalisation of Unexpected Income Accounts as at 1 August 2020
- 9.6 Fundraising Report for the year ended 31 July 2020
- 9.7 Management Accounts P12
- 9.8 Annual Report on the College's Tax Strategy 2020
- 9.9 Schedule of Insurances for 2020-2021
- 9.10 Research Awards
- 9.11 Investment Committee Report

Michael D'Souza
Chair of the Finance Committee
November 2020

See [**Financial Statements**](#)

for the year to 31 July 2020

These pages have been redacted

Finance Committee	
Meeting date	10 November 2020
Paper reference	FC-20-11-10-12
Status	Final
Access	Members and senior executives
FOI exemptions	None

Execution of Deeds Policy and Establishment of Powers of Attorney

Action required

- ☒ For approval
☐ For discussion
☐ To note

Motion: That the Finance Committee approve the revised Policy on Execution of Deeds, including the proposal to appoint Powers of Attorney.

Executive summary

Procurement Services, Finance, Legal Services and the Secretariat have been working on a range of policy documents and procedures related to contracts. The overall contracts policy is still a work in progress but there have been a couple of issues to deal with more immediately. One was to put in place an electronic signing facility on a pilot basis and DocuSign is now in place with work about to start on expanding the project for wider access.

A second issue has been how to manage the need to execute deeds and sign documents under seal. The current procedure for the use of the Common Seal is quite antiquated and awkward at the best of times and unworkable in a work from home environment.

The attached draft Policy on Execution of Deeds sets out two ways of executing a deed: via application of the seal (with a simplified process for doing that) or via a power of attorney process. In drafting this external legal advice was obtained from Penningtons. A few key points:

- There is nothing in the College Charter, Statutes, Ordinances or Financial Regulations that would prevent this - in fact none of these documents references the execution of deeds at all and the Charter and Statutes essentially give the Council carte blanche to establish processes for carrying out its responsibilities as long as they are not contrary to anything in the Charter and Statutes
- We do have precedents for using powers of attorney, particularly related to IP documents
- Other universities have taken similar measures in response to COVID
- The policy proposes strict controls for the assignment of PoAs, governed by the Senior Vice President (Operations) and by Legal Services, and monitored by Procurement Services – they will be time limited, limited to specific role holders, and limited with respect to the kinds of agreements individual PoAs are able to execute
- A record of instances where the Seal or Powers of Attorney are used would be maintained and available for inspection by members of College Council.

Attached are the draft policy, the draft Power of Attorney assignment form, and the current *Procedures for the use of the Common Seal of the College*.

Policy on Execution of Deeds

Policy Category:	General
Subject:	Execution of documents deemed to be deeds via Seal or Power of Attorney
Approving Authority:	Council/Finance Committee
Responsible Officer:	Senior Vice-President (Operations)
Responsible Office:	Procurement Services
Related Procedures:	
Related College Policies:	Policy on Contracts
Effective Date:	
Supersedes:	New
Next Review:	2024

I. Purpose & Scope

This policy describes the use of the Common Seal of the College and the designation of Powers of Attorney as means by which documents deemed to be deeds may be executed.

II. Definitions

Common Seal of the College (the “Seal”) means the official seal used by King’s College London to show that a legal document has been authenticated and approved.

“Power of Attorney” means a formal appointment by which the College (the donor) gives an authorised member of staff (the attorney) the power to act on the College’s behalf and in their name e.g. to execute deeds on behalf of the College.

“Deed” means a written document which is executed with the necessary formality (that is, more than a simple signature), and by which an interest, right or property passes or is confirmed, or an obligation binding on some person is created or confirmed.

III. Policy

1. Requirement for a Deed

1.1. In general, the circumstances under which a deed may be required include:

- a) conveyances of land, or of any interest in land and certain mortgages;
- b) leases of land for terms over three years;
- c) assents, legal charges of land and transferring title to property; or
- d) the grant of powers of attorney.

1.2 A deed may also be preferred where:

- a) there is doubt about whether there is adequate consideration (i.e. the price paid by one party in exchange for a benefit from the other, for example where a guarantee is given by a third party);
- b) the parties to a contract wish to take advantage of an extended period to bring an action for breach of contract (12 years under a deed as opposed to 6

- years under a normal contract); ¹or
 - c) a contract is subsequently varied or otherwise amended and it is not clear that all the parties are providing fresh consideration.
- 1.3 It is conventional to use a deed where:
- a) there are indemnities against certain tax liabilities;
 - b) there is an assignment of intellectual property;
 - c) there is a release of a security; or
 - d) a guarantee is given to a bank for amounts previously advanced.
- 1.4 At King's, deeds may be executed in two ways:
- a) under Seal (see 2 below); or
 - b) by an authorised person under Power of Attorney (see 3 below).

2. Seal of the College

2.1 When the Seal should be used

- 2.1.1 The Seal may be used in the execution of documents deemed to be deeds. Usually such documents would describe themselves as a deed.
- 2.1.2 The use of the Seal is not necessary for agreements entered into by the College which are not in the form of a deed, i.e. most of the agreements (simple contracts) to which the College is a party.
- 2.1.3 The Seal may also be affixed to agreements and documents where its use is:
 - a) required by the law of other countries (e.g. where an agreement with an international partner states that it is to be covered by the law of another jurisdiction rather than English law, and that country's law requires the use of a seal); or
 - b) desirable for ceremonial reasons.

2.2 Authentication

- 2.2.1 When the Seal is affixed to deeds and documents (other than College Diplomas) it must be authenticated by the two signatures of:
 - a) the Senior Vice-President (Operations) or designate; and
 - b) the President & Principal or other member of the College Council designated by the President & Principal
- 2.2.2 Any document purporting to be an instrument made or issued by or on behalf of the College which has had the seal affixed and has been authorised in accordance with 2.2.1 shall be treated as a deed unless the contrary is shown.

2.3 Recording use of the seal

The Senior Vice-President (Operations) shall maintain a record of instances where the Seal has been used, which shall be available for inspection by members of the College Council.

¹¹ This provision should only be invoked when absolutely necessary and is expected to be used rarely. The six-year limitation period should be adequate for commercial agreements as the six-year limit does not engage until after a defect or problem has been identified.

2.4 Custody of the Seal

The Senior Vice-President (Operations) has custody of the Seal and is responsible for its proper safekeeping and use.

3. Power of Attorney

- 3.1 In the alternate to executing under Seal, authorised members of staff may execute deeds under Power of Attorney.
 - 3.1.1 Executing a deed under Power of Attorney removes the requirement for the Seal to be affixed and for authentication (as set out at 2.2. above).
 - 3.1.2 Executing a deed under Power of Attorney enables the document to be executed in the same way as a simple contract i.e. with the attorney's sole signature.
 - 3.1.3 When executing a deed under Power of Attorney the attorney should explicitly state within the document that they are executing the deed under a Power of Attorney granted by King's College London.
 - 3.1.4 It is possible the other party to a deed may wish to inspect the relevant King's Power of Attorney, to ensure the power is valid and the deed will be properly executed. In those circumstances it would usually be appropriate for the executed Power of Attorney document to be shared with the other party.
- 3.15 Before exercising power of attorney and executing a deed, the attorney who will be signing should first notify the Senior Vice-President (Operations).
- 3.2 Powers of Attorney are granted to staff in specific roles by the President & Principal on the recommendation of the Senior Vice-President (Operations).
- 3.3 The number of Powers of Attorney granted at any given time is at the discretion of the President & Principal but should be no more than is needed to carry out the College's business.
- 3.4. Powers of Attorney may be limited in scope by category or type of transaction, monetary value of the agreement/contract, or both.
- 3.5 Powers of Attorney must be granted and formalised using the form attached hereto as Appendix A and reviewed by the College's General Counsel.
- 3.6 When granting Power of Attorney to a member of staff, the Power of Attorney document must be executed under Seal, following the procedure set out at section 2 of this policy.
- 3.7 A copy of each executed Power of Attorney must be filed and maintained by Procurement Services.
- 3.8 Powers of Attorney will be time-limited as appropriate for the nature of the transactions for which they are granted, but will normally be for a three-year period at which time they will be reviewed and a determination made as to whether they are renewed.

Policy on Execution of Deeds

- 3.9 Powers of Attorney will cease automatically if the holder ceases to be in the specific role for which it was granted.
- 3.10 The list of Powers of Attorney will be reviewed by the Senior Vice-President (Operations) at least every three years.

4. Review

This policy will be reviewed at least every three years.

Procedure for use of the Common Seal of the College

This procedure replaces the provisions in the former Charter and Statutes and General Regulations regarding the Common Seal of the College. The College is no longer required by its [Charter and Statutes](#) to have a seal, but may have one as a matter of Common Law.

Custody of the Seal

The Senior Vice-President (Operations) has custody of the Common Seal of the College, and is responsible for its proper safekeeping and use.

When the Seal should be used

Where the College is to be a party to a deed, English law requires the Common Seal of the College to be affixed to the deed and the affixing to be attested on behalf of the College as described below. Use of the Common Seal is not necessary for agreements entered into by the College which are not in the form of a deed, i.e. most of the agreements to which the College is a party. Agreements which are to be executed as a deed should describe themselves as a deed and should be executed in accordance with the procedure described below.

In general, the circumstances that the College may come across where a deed is required include:

- conveyances of land, or of any interest in land and certain mortgages;
- leases of land for terms over 3 years;
- assents, legal charges of land and transferring title to property; and
- the grant of powers of attorney.

A deed may also be preferred where:

- there is doubt about whether there is adequate consideration (i.e. the price paid by one party in exchange for a benefit from the other, for example where a guarantee is given by a third party);
- the parties to a contract wish to take advantage of an extended period to bring an action for breach of contract (12 years under a deed as opposed to 6 years under a normal contract); or
- a contract is subsequently varied or otherwise amended and it is not clear that all the parties are providing fresh consideration.

It is conventional to use a deed where:

- there are indemnities against certain tax liabilities;
- there is an assignment of intellectual property;
- there is a release of a security; or
- a guarantee is given to a bank for amounts previously advanced.

The Common Seal may also be affixed to agreements and documents where its use is:

- required by the law of other countries (e.g. where an agreement with an international partner states that it is to be covered by the law of another jurisdiction rather than English law, and that country's law requires the use of a seal); or
- desirable for ceremonial or other reasons.

Attestation of deeds and documents

To comply with UK law, the affixing of the Common Seal to deeds and documents (other than College Diplomas) must be attested by both of the following persons:

1. the Senior Vice-President (Operations) or a person deputised by him to attest to the affixing of the Common Seal (currently, the Director of Academic Services and the Deputy Head of Administration (Arts and Humanities) are so authorised);

and

2. a member of the College Council, who shall normally be the Principal or, in the Principal's absence, a Vice-Principal who is also a member of the College Council.

Deeds should include the following attestation clause, as well as the Common Seal:

Executed as a deed by affixing the Common Seal of King's College London in the presence of:	<div>Common Seal of the College</div>
<hr/> <i>Signature of College Council member</i>	
<hr/> <i>Signature of Head of Administration & College Secretary or authorised deputy</i>	

Recording use of the seal

The Senior Vice-President (Operations) shall maintain a record of instances where the Common Seal has been used, which shall be available for inspection by members of the College Council.

Enquiries regarding this procedure

This procedure is maintained by the [Governance Team](#) in Academic Services. Where there is any doubt as to whether a contract should be executed as a deed or there are any queries in relation to the content of this procedure, enquiries should be directed to the [Head of Governance](#).

Approval

This procedure was approved by the Senior Vice-President (Operations) on 13 April 2010

King's College Council	
Meeting date	24 November 2020
Paper reference	KCC-20-11-24-7.2
Status	Final
Access	Members and senior executives
FOI release	Subject to Redaction
FOI exemption	None, subject to redaction for commercial interest or personal data

Joint Report of the Estates Strategy Committee and the Finance Committee

Contents	Meeting at which considered	Consent agenda	Council action
Centre for Children & Young People's Mental Health Financial Evaluation Schedule (Annex 1) Final Business Case (Annex 2)	10 November 2020	No	Approve

For Approval

Pears Maudsley Centre for Children & Young People's Mental Health – Final Business Case

Motion: That Council approve the investment in the Pears Maudsley Centre for Children & Young People's Mental Health, subject to:

- (i) detail on incremental productivity enhancements being agreed and safeguards for ensuring joint control and cost overruns being provided; and
- (ii) The Estates Strategy Committee assuring itself that overruns would not happen on this project.

Council approved the Centre for Children & Young People's Mental Health (CYP) in principle in January 2020 subject to conditions which were addressed in the Committees' meeting papers. The Committees received the case for co-investment in the purpose-built on the site of the Portacabin on the Green on the Denmark Hill Campus. The site had been formally occupied by KCL and was owned by South London and Maudsley NHS Foundation Trust (SLaM).

The new CYP would bring together educational, research and clinical activities in a timely, high profile and world leading centre for mental health care in the UK.

The report did not present a Final Business Case for the entire scheme, which would be led by SLaM, but set out the case for co-investment in it. The total cost of the 'full scheme' as outlined in the SLaM FBC is £68.8m within which the scope of the KCL ask is:

- 1) To approve the capital investment of up to £11.2m (with the capital cost to be paid in 2024)
- 2) To approve the fundraising risk of up to £2m
- 3) To assume wider risks associated with this initiative

The Committees noted that there were outstanding points remaining to be resolved over the coming weeks as the project moves through governance in order to meet several outstanding actions which are being worked through by the programme team (both SLaM and KCL colleagues).

These pages have been redacted

Report of the Audit, Risk and Compliance Committee

Contents	Meeting at which considered	Consent agenda	Council action
1. External audit report and Financial Statements (Annexes 1 & 2)	03 November 2020	No	Approve
2. Annual statement regarding the Prevent duty (Annex 3)	03 November 2020	Yes	Approve
3. Annual Report of the Audit, Risk and Compliance Committee (Annex 4)	03 November 2020	No	Note
4. Annual Report of the Director of Business Assurance (Annex 5)	03 November 2020	Yes	Note
5. Internal Audit update	03 November 2020	Yes	Note
6. Compliance report	03 November 2020	Yes	Note
7. Enterprise Risk Management update	03 November 2020	Yes	Note
8. Risk presentations and discussions:	03 November 2020	Yes	Note
a. International partnership risk: China (Annex 6)			
b. Brexit risk management (Annex 7)			
c. Cyber-security risk management (Annex 8)			
9. ARCC Terms of Reference (Annex 9)	03 November 2020	Yes	App

For approval

1. External audit report and Financial Statements

Recommended: That the Council approve the External Auditors' Report for the year ended 31 July 2020 and the letter of management representation from the university to the external auditors.

The Chief Accountant presented the annual accounts for the year 2019-20, noting that there were a number of complexities in the accounts, the most significant of which were connected to the land revaluation and the release of the prior year pension provision. There was a need to improve the cash position of the university, and it was reported that work was underway to do that. Owing to the volatility in the accounts and the external environment in general, there was a greater focus this year on the "whole of statement" performance. This meant that the forecasting of cash generation at various points in the year will become more important.

The reporting principles around going concern had received increased focus this year. It was noted that there was unlikely to be a better test of going concern than the last few months of the previous financial year and the institution had demonstrated real resilience during that period.

The Chief Accountant provided reassurance to members that the COVID pandemic would not have a significant effect on land values and explained that the liability towards the USS pension scheme was driven from the valuation of the scheme, which dictated the university's share in the USS Deficit Recovery Plan.

Ms Fleur Nieboer and Mr Stephen Lucas presented the external audit findings on behalf of KPMG. Ms Nieboer expected to issue the audit report with no modification to the financial statements and it would contain an unqualified and positive opinion on the accounts. It was reported that work had been concluded on the validation of the land valuation project and that the auditors had also taken into account the key impacts

from COVID throughout their work on this audit and had summarised them in the report. This was especially important in terms of *going concern*. The pressures of the external environment meant that the financial sustainability of the university had been tested extensively by the auditors. Taking into account liquidity and the cash balance position, the auditors had no concerns about material uncertainty. It was also observed that the external audit had also taken into account loan covenant compliance and that the review of covenants had raised no concerns. The auditors also reported that there were no significant concerns over the areas of significant audit risk, which had been set out in the audit strategy in June. These were revenue recognition, journals and the land valuation. The auditors also reported their findings on the key areas of management judgement. In relation to the provisions for pensions, it was noted that the assumptions of the university about future staffing numbers and payroll appeared to be balanced and reasonable ones. The external auditors also noted that they had undertaken work to confirm that the approach and assumptions employed in the land valuation represented balanced judgements. The subsidiary audits had raised no issues of concern. One recommendation had been made in the audit report, which related to controls over research income. However, it was noted that management were already putting a new system in place to address this specific concern. Only one audit difference had been identified, which related to the treatment of research income and amounted to £980k. This amount had been adjusted in the accounts. Ms Nieboer noted that the performance in relation to adjustments had been excellent for an institution of the size and complexity of King's. In conclusion, Ms Nieboer confirmed the independence of the auditors and highlighted the non-audit fees charged to King's by KPMG during the year, none of which breached the limits which need ARCC approval. The members expressed overall satisfaction with the results of the external audit and recommended the external audit report (ISA260) to the College Council to be approved.

The members of ARCC were pleased to note the very positive comments of the auditors commending the efficiency of the production of information by the Finance department for the audit, and quality of that information when it was received. The ARCC extends its thanks to the Interim Chief Finance Officer and the Chief Accountant for overseeing such a successful process.

KPMG audit report and management letter – See Annex 1.

Letter of Management Representation to KPMG – See Annex 2.

2. Annual statement regarding the Prevent Duty

Recommended: That the Council approve the Annual Prevent Statement for the year ended 31 July 2020.

Members of the ARCC considered the Annual Prevent Report and accompanying statutory Statement which had been prepared by the Academic Regulation, Policy and Compliance team in the Students and Education Directorate. It is a requirement of the OfS that the statement on the management of the Prevent duty should be submitted by the university as part of its Annual Accountability Return. Members of the ARCC recommended the Annual Prevent Statement to the Council for final approval.

Annual Prevent Statement – See Annex 3.

For note

3. Annual report of the Audit, Risk and Compliance Committee

The OfS has not made the production of an annual report by the audit committees of Higher Education Providers a requirement this year. However, it is laid out as good practice in the UK Code of Corporate Governance for the audit committees of organisations to address their board at least once per year in a formal report. On that basis, the Audit, Risk and Compliance Committee has prepared a report, reviewing

its work in the 2019-20 year. Members of the Audit, Risk and Compliance Committee reviewed their annual report at this meeting and approved it for submission to the Council and to the accountable officer.

Annual Report of the Audit, Risk and Compliance Committee – See Annex 4.

4. Annual Report of the Director of Business Assurance

In previous years, it has been a regulatory requirement for the Internal Audit service of a Higher Education Provider to produce an annual report for the governing body and the accountable officer. The OfS do not require this report to be made this year, but in line with good practice and following the example of the Audit, Risk and Compliance Committee in preparing an annual report, the Director of Business Assurance has prepared an annual review addressed to the governing body and accountable officer. In summary, the Director of Business Assurance has concluded that internal controls are generally considered to be adequate and effective, although audit work this year has identified some control weaknesses. Where issues have been raised, management has been willing to engage and consider improvements. There is evidence to support the conclusion that value for money is sought in the management of various functions and activities and that, overall, the university has an adequate and effective approach to achieving value for money, although the Chief Procurement Officer pursues a programme of continuous improvement. Governance arrangements are also considered to be adequate and effective, following comprehensive review and reform in 2018 and 2019. The arrangements for managing the risks attached to specific work packages are generally considered to be adequate and effective, however, work is underway to improve the processes by which risk is monitored, mitigated and reported more broadly throughout the institution.

Annual Report of the Director of Business Assurance – See Annex 5.

5. Internal Audit update

The Director of Business Assurance reported to the Committee that progress against the ambitious internal audit plan set out in June had been good, despite the constraints of remote working and staff vacancies in the audit team. Three audits had been fully completed, whilst most of the others were either nearing completion or were with management for comment. A further four audit reviews had been completed as part of the compliance assurance remit. In summary, the review of accounting for the Furlough scheme had noted that the arrangements had been reasonable and sensible for a project undertaken at pace and that the reconciliations only showed minor discrepancies, well within an acceptable materiality range. The review of purchasing card management had highlighted some areas which, although identified for particular remedial action by the Chief Accountant, had not quite been completed yet. It was anticipated that these actions would be completed soon. The review of arrangements for hiring and managing non-permanent member of staff had indicated some control weaknesses over one of the university's biggest areas of spend, which is particularly important to manage during a period of austerity. A number of areas had been highlighted for management attention and several recommendations had been made for remedial action.

6. Compliance Report

It was noted that the areas which had previously indicated that the pandemic lockdown might have an effect on compliance to regulatory or legislative requirements had not subsequently experienced any adverse effects. The Director of Business Assurance reported that, since the last Compliance Assurance Report, the university had declared that it was no longer bound by the Public Contracting Regulations because the income profile of the university had altered and less than half its income was now attributable to public funds. It was noted that there was only one compliance area which rated its breach risk as high (red). This was Health and Safety, and it was decided to invite the Interim Director of Health and Safety Services to the next meeting of the ARCC to present the Annual Health and Safety Report and to discuss the compliance risk relating to Health and Safety. Two updates were included for members in the reports. One related to the ongoing fire safety issues at the Champion Hill Hall of Residence, and the other to a Suspicious Activity Report which had been submitted to the National Crime Agency by the university. It was also noted that four Compliance Assurance Reviews had been completed

and another two were underway. No major concerns were reported and there were no specific questions from members.

7. Enterprise Risk Management update

The Senior Vice President (Operations) noted that, whilst management had always taken the role of Internal Audit in risk management seriously and that Business Assurance had often sat alongside management in dealing with risk, there was a potential challenge to this approach, insofar as Internal Audit might be considered to be a little too close to management to be able to provide effective assurance. In recognition of this, the university was changing the way in which Enterprise Risk Management would be handled in the future, with a cleaner separation between management and audit. As a result, executive responsibility was now embedded in RERC, which has become the Revenue, Expenditure and Risk Committee, and that group would draw more broadly for support on the Strategy, Planning and Analytics team. The Enterprise Risk Management Committee will still continue to function and would be a key part of drawing the wider management team of the university, including the Executive Deans and Professional Service Directors, into formal risk management activities.

The members of the ARCC were pleased to note the new thinking and the much clearer separation of risk management and operations from assurance. The ARCC was particularly pleased that risk management operations were now being more deeply embedded into the work at senior executive level within the university and will closely review the progress of this change in about six months' time. The Committee is scheduled to receive a detailed progress report from the Senior Vice President (Operations), the Director of Strategy, Planning and Analytics and the Director of Business Assurance at its June 2021 meeting.

8. Risk presentations and discussion

The ARCC members received presentations on three key risk topics at this meeting. A discussion on the risks relating to international partnerships and, in particular, to partnerships with organisations from China was led by the Director of International Strategy and Planning and the Director of the Lau China Institute. The Director of International Strategy and Planning also presented an item on risks relating to the preparations for the final withdrawal of the United Kingdom from the European Union on 01 January 2021. Finally, members received an update on the progress of actions to mitigate the risks relating to cyber-security from the Senior Vice President (Operations) and the Chief Information Officer.

International Partnership Risk: China (minute) – See Annex 6.

Risks arising from the final withdrawal of the UK from the EU (minute) – See Annex 7.

Update on mitigating cyber-security risks (minute) – See Annex 8.

For approval

9. Update Terms of Reference and Membership for the Audit, Risk & Compliance Committee

Motion: That the Council approve the minor amendments to the Audit, Risk & Compliance Committee's Terms of Reference and Membership.

A small number of updates to the Committee's Terms of Reference are proposed to Council for approval. The updates identify the ARCC as being responsible for keeping matters connected to cyber-security in view on behalf of the College Council and clarified the Committee's responsibility for oversight of risk management at the university as primarily concerned with systems and processes, rather than at the level of management of individual risks. The updates to the membership list were noted, pending the approval of the College Council.

These pages have been redacted

Letter of Management Representation

Chairman of Council
The Rt Hon the Lord Geidt
 GCB GCVO OBE QSO FKC

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 London WC2R 2LS
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KPMG LLP
 15 Canada Square
 London
 E14 5GL

24 November 2020

Dear Sirs

This representation letter is provided in connection with your audit of [the Group and] University financial statements of King's College London ("the University"), for the year ended 31st July 2020, for the purpose of expressing an opinion:

- i. as to whether the financial statements give a true and fair view of the state of the Group's and University's affairs as at 31st July 2020 and of the Group's and University's income and expenditure, gains and losses, changes in reserves and cash flows for the year then ended;
- ii. whether the financial statements have been properly prepared in accordance with UK accounting standards, including FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland*, and with the 2019 Statement of Recommended Practice – Accounting for Further and Higher Education (FEHE SORP); and
- iii. meet the requirements of the Accounts Direction dated 25 October 2019 issued by the Office for Students.

These financial statements comprise the Group and University's balance sheets as at 31st July 2020, the Group and University Statements of Comprehensive Income, the Group and University Statements of Changes in Reserves, and the Group Statement of cash flows, and notes, comprising a summary of significant accounting policies and other explanatory notes.

The Council confirms that the representations it makes in this letter are in accordance with the definitions set out in the Appendix to this letter.

The Council confirms, to the best of its knowledge and belief, having made such inquiries as it considered necessary for the purpose of appropriately informing itself:

Financial statements

1. The Council has fulfilled its responsibilities, as set out in the terms of the audit engagement dated 19 September 2018, for the preparation of financial statements that:
 - give a true and fair view of the state of the Group's and the University's affairs as at the end of its financial year and of the Group's and University's income and expenditure, gains and losses, changes in reserves and cash flows for the year then ended;
 - have been properly prepared in accordance with UK Generally Accepted Accounting Practice (including FRS 102), and the FEHE Statement of Recommended Practice; and
 - meet the requirements of the Accounts Direction dated 25 October 2019 issued by the Office for Students.

The financial statements have been prepared on a going concern basis.

2. Measurement methods and significant assumptions used by the Council in making accounting estimates, including those measured at fair value, are reasonable.
3. All events subsequent to the date of the financial statements and for which Section 32 of FRS 102 (*Events after the End of the Reporting Period*) requires adjustment or disclosure have been adjusted or disclosed.
4. The effects of uncorrected misstatements are immaterial, both individually and in the aggregate, to the financial statements as a whole. A list of the corrected misstatements is attached to this representation letter.

Information provided

5. The Council has provided you with:
 - access to all information of which it is aware, that is relevant to the preparation of the financial statements, such as records, documentation and other matters;
 - additional information that you have requested from the Council for the purpose of the audit; and
 - unrestricted access to persons within the Group and the University from whom you determined it necessary to obtain audit evidence.
6. All transactions have been recorded in the accounting records and are reflected in the financial statements.
7. The Council confirms the following:
 - (i) The Council has disclosed to you the results of its assessment of the risk that the financial statements may be materially misstated as a result of fraud.

Included in the Appendix to this letter are the definitions of fraud, including misstatements arising from fraudulent financial reporting and from misappropriation of assets.

- (ii) The Council has disclosed to you all information in relation to:
 - (a) Fraud or suspected fraud that it is aware of and that affects the Group and the University and involves:
 - management;

- employees who have significant roles in internal control; or
 - others where the fraud could have a material effect on the financial statements; and
- (b) allegations of fraud, or suspected fraud, affecting the Group and the University's financial statements communicated by employees, former employees, analysts, regulators or others.

In respect of the above, the Council acknowledges its responsibility for such internal control as it determines necessary for the preparation of financial statements that are free from material misstatement, whether due to fraud or error. In particular, the Council acknowledges its responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud and error.

8. The Council has disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing the financial statements.
9. The Council has disclosed to you and has appropriately accounted for and/or disclosed in the financial statements, in accordance with FRS 102 Section 21, *Provisions and Contingencies*, all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.
10. The Council has disclosed to you the identity of the Group and the University's related parties and all the related party relationships and transactions of which it is aware. All related party relationships and transactions have been appropriately accounted for and disclosed in accordance with FRS 102 Section 33, *Related Party Disclosures*.

Included in the Appendix to this letter are the definitions of both a related party and a related party transaction as we understand them and as defined in FRS 102.

11. The Council confirms that:
 - (a) The financial statements disclose all of the key risk factors, assumptions made and uncertainties surrounding the University's and Group's ability to continue as a going concern as required to provide a true and fair view and to comply with FRS 102.
 - (b) No material events or conditions have been identified that may cast significant doubt on the ability of the University and the Group to continue as a going concern.
12. On the basis of the process established by the Council and having made appropriate enquiries, the Council is satisfied that the actuarial assumptions underlying the valuation of pension scheme liabilities are consistent with its knowledge of the business and in accordance with the requirements of section 28 of FRS 102 .
13. The Council further confirms that:
 - (a) all significant retirement benefits, including any arrangements that are:
 - statutory, contractual or implicit in the employer's actions;
 - arise in the UK and the Republic of Ireland or overseas;
 - funded or unfunded; and
 - approved or unapproved,
 have been identified and properly accounted for; and
 - (b) all plan amendments, settlements and curtailments have been identified and properly accounted for.
14. In particular the Council confirms that:

- there are no significant matters that have arisen that would require a restatement of the corresponding figures.
- the Council confirms that costs or credits attributable to the agreement of a deficit recovery plan for the Universities Superannuation Scheme (USS) are calculated using assumptions that are consistent with its knowledge of the business. In particular, the Council confirms that the assumptions for assumed salary inflation in each year during the life of the plan and assumed USS membership changes during the life of the plan are consistent with the University's projected employee population profile.
- we are not aware of any issues or disputes associated with delivery undertaken by partners which would impact on the financial statements.
- we are of the opinion that the land and buildings included within tangible fixed assets have been valued appropriately in accordance with the requirements of FRS 102, and to the best of our knowledge and belief we are satisfied that no impairment provision is necessary in respect of the University's estate.
- to the best of our knowledge and belief the University has complied with the requirements of the Charities Act 2011. In particular, the University has disclosed all payments made in relation to trustees expenses and all "connected institutions and bodies" have been disclosed appropriately. Furthermore, all serious incidents, as defined under the Act, have been captured and recorded appropriately.
- there are no issues arising from the finalisation of student data for the year ending 31 July 2020 which has been used to produce the University's 2020 HESA return/re-creation of HESES19 which would have a material impact on teaching funding from the Office for Students or English undergraduate fee income recognised in the financial statements.
- we are not aware of any issues relating to the University's other Office For Students or Research England funding streams years (e.g. Higher Education Innovation Fund grants) which may lead to a clawback in funding over and above that recognised in the financial statements.
- to the best of our knowledge and belief the University has complied with the terms and conditions of any capital grant funding received during the year and in respect of other capital grant funding received in prior years. In all instances, the University is satisfied that the agreed outputs against which each project will be assessed will be delivered.
- to the best of our knowledge and belief the University has complied with the terms and conditions of any revenue grant funding (for example research funding) received in recent years and where agreed outputs are to be delivered as part of the grant agreement, the University has or anticipates delivering these.
- In all material respects funds from whatever source administered by the Group and the University for specific purposes have been applied to those purposes during the year ended 31 July 2020;
- in all material respects the University has complied with the Office for Students and Research England terms and conditions of funding in the period from 1 August 2018 to 31 July 2020.

- to the best of our knowledge and belief the University has complied with the Office for Students guidance for access and participation spend and any spend classified as access and participation spend is in accordance with this guidance.
- all payments made from endowment funds have been made in accordance with the terms of the funds to which they relate
- In our opinion, all investment properties have been valued appropriately in accordance with the requirements of FRS 102 and the carrying value is appropriate based upon professional advice, current usage and plans for future usage of these premises.
- There are no other factors affecting the valuation of investment properties that need to be reflected in the accounts to 31 July 2020 other than as disclosed to you.
- All of the University's material interests in and arrangements with third parties have been considered, and the treatment in the financial statements in each case where the amounts involved could be significant is in accordance with applicable accounting standards.

15. The Council provides the following specific representations as follows:

- (a) The College instructed its valuer, Gerald Eves, to perform a valuation exercise of its estate as at 31 March 2020. The Council confirms that it is satisfied with the completeness and accuracy of the instructions provided to the valuer and confirms that the College has not unduly influenced Gerald Eves in determining the valuation of land.
- (b) The Council confirms that it is satisfied with the accuracy of the underlying data used as the basis of the revaluation exercise, specifically the land and building measurements and the classification of assets between operational, non-operational and specialised.
- (c) The Council confirms that it has considered the valuation of its land and the material uncertainty noted within the Gerald Eves valuation report, and that the Council is satisfied that they are included at an appropriate valuation and adequately reflects the factors that may impact on the valuation.

This letter was tabled and agreed at the meeting of the Council on 24 November 2020

Yours faithfully,

The Rt Hon the Lord Geidt GCB GCVO OBE QSO FKC
Chair of Council

Appendix A to the Representation Letter of King's College London: Definitions

Financial Statements

A complete set of financial statements comprises:

- Group and University balance sheets as at the end of the period;
- Group and University Statement of Comprehensive Income for the period;
- Group and University Statement of Changes in Reserves for the period;
- Group Cash Flow Statement for the period; and
- notes, comprising a summary of significant accounting policies and other explanatory information.

Material Matters

Certain representations in this letter are described as being limited to matters that are material.

FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland* states that:

Omissions or misstatements of items are material if they could, individually or collectively, influence the economic decisions of users taken on the basis of the financial statements. Materiality depends on the size and nature of the omission or misstatement judged in the surrounding circumstances. The size or nature of the item, or combination of both, could be the determining factor.

Fraud

Fraudulent financial reporting involves intentional misstatements including omissions of amounts or disclosures in financial statements to deceive financial statement users.

Misappropriation of assets involves the theft of an entity's assets. It is often accompanied by false or misleading records or documents in order to conceal the fact that the assets are missing or have been pledged without proper authorisation.

Error

An error is an unintentional misstatement in financial statements, including the omission of an amount or a disclosure.

Prior period errors are omissions from, and misstatements in, the entity's financial statements for one or more prior periods arising from a failure to use, or misuse of, reliable information that:

- a) was available when financial statements for those periods were authorised for issue; and
- b) could reasonably be expected to have been obtained and taken into account in the preparation and presentation of those financial statements.

Such errors include the effects of mathematical mistakes, mistakes in applying accounting policies, oversights or misinterpretations of facts, and fraud.

Management

For the purposes of this letter, references to “management” should be read as “management and, where appropriate, those charged with governance”.

Qualifying Entity

A member of a group where the parent of that group prepares publicly available consolidated financial statements which are intended to give a true and fair view (of the assets, liabilities, financial position and profit or loss) and that member is included in the consolidation by means of full consolidation

Related Party and Related Party Transaction

Related party:

A related party is a person or entity that is related to the entity that is preparing its financial statements (referred to in *FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland* as the “reporting entity”).

- a) A person or a close member of that person’s family is related to a reporting entity if that person:
 - i. has control or joint control over the reporting entity;
 - ii. has significant influence over the reporting entity; or
 - iii. is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.
- b) An entity is related to a reporting entity if any of the following conditions apply:
 - i. The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
 - ii. One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
 - iii. Both entities are joint ventures of the same third party.
 - iv. One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
 - v. The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
 - vi. The entity is controlled, or jointly controlled by a person identified in (a).
 - vii. A person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).
 - viii. The entity, or any member of a group of which it is a part, provides key management personnel services to the reporting entity or to the parent of the reporting entity.

Related party transaction

A transfer of resources, services or obligations between a reporting entity and a related party, regardless of whether a price is charged.

Appendix B to the Management Representation Letter of King's College London

Summary of unadjusted audit differences

Under the requirements of ISA 260 we are required to present any unadjusted audit differences, other than those which are clearly trifling, to the Audit Committee.

There are no unadjusted audit differences for the year ended 31 July 2020.

Adjusted audit differences

ISA 260 also requires us to report differences found during our audit which have been adjusted by management in arriving at the final results for the University. These adjusted amounts need to be considered by the Audit Committee as they may indicate broader failures in systems of controls which will need addressing.

XXXXXXX

There were also a number of other presentational adjustments made to the accounts following our review including grossing up of balances and reclassification of other balances. These have all been adjusted for and are reflected in the financial statements

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Prevent Annual Accountability Statement 2019-20

As Chair of Council, I can confirm, on behalf of King's College London, that, throughout the academic year and up to the date of approval, King's College London has had due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty); has provided OfS all required information about its implementation of the Prevent Duty; and has reported to OfS all serious issues related to the Prevent Duty in a timely way.

Governance

King's College London has responded to the pandemic by reviewing its Prevent Duty risk assessment to ensure adequate measures are in place. As the university is taking a flexible approach to teaching in order to protect the health of our community, a combination of campus-based and online teaching is being delivered for all programmes from September 2020. Consequently, the Safeguarding Steering Group, which is chaired by the Vice-Principal (Education) and is responsible for ensuring the university's compliance with the Duty, completed a review of the risk assessment and action plan in July 2020. Prevent-related activity continues to be coordinated by the Academic Regulation, Policy and Compliance team within the Students & Education Directorate and operational support is provided by the Safeguarding Oversight Group, which reports to the Steering Group. These Groups have reviewed all guidance released by the Office for Students and proposed further actions as detailed below. KCL representatives have actively engaged with the Higher Education Network, OfS surgeries and webinars (including during the pandemic) and continue to work in partnership with Local Authorities.

Welfare

King's continues to anchor its approach to its Prevent responsibilities in its concern for student welfare and the Student of Concern (SOC) procedure remains a robust and effective route of referral for a student of concern. This procedure was moved fully online at the start of the pandemic and a rota system was put in place to ensure it is constantly monitored and referrals are assigned to the appropriate caseworker within 24 hours. Any staff member or student can submit a concern through our Student of Concern webpage. Likewise, those external to the university are able to refer an individual using the "log a case" feature on the respective Student Services Online [article](#).

The College received 719 welfare cases requiring specialist advice and support through SOC for the 2019/20 academic year. This represented an increase of 45.5% on the previous year. 64% of these referrals were related to concerns about a student's mental ill-health with the remaining 36% being on a range of safeguarding concerns including being a victim of violence, harassment and threat of homelessness. This increase in the number of cases is considered to be due to a greater awareness of SOC and confidence in the process. The process was rebranded at the start of the year and improvements to the submission form allows individuals to select more than one serious risk, which more appropriately reflects the complexity of many SOC referrals.

A suite of webpages detailing information on the university's approach to Safeguarding were published over the summer. These pages include a section on the Prevent Duty, which discusses relevant policies and procedures; welfare; freedom of speech and external speakers; IT and Research. Resources, such as, Prolonged Lack of Contact Guidance, Online Safeguarding Procedures, and Guidance on Spotting the Signs of Abuse/Neglect/Exploitation are also included. These webpages have since been publicised in the King's Essentials newsletter, which is distributed to all staff, and the Academic Strategy newsletter to raise awareness of this resource and to remind staff of the institution's safeguarding responsibilities.

External Speakers

The university continues to work in collaboration with the Students' Union regarding events with external speakers and ensuring freedom of expression. Most events planned for late February and from March onwards were cancelled due to the pandemic and as per Government legislation/guidance. Investigation into supporting online external speaker events is underway by the Freedom of Expression Standing Advisory Group.

Whilst the university and KCLSU are reviewing the current risk assessment process, it is likely there will be no student events with External Speakers on campus until February 2021. However, the Room Bookings: External Speaker Policy applies to all virtual external speaker events and students are being encouraged to continue with the process outlined in the Policy as normal. Several virtual event requests involving external speakers have already been submitted to the process this year. Additional policy guidelines and mitigations will be drafted for the External Speaker Policy during 2020/21.

Training

A significant number of staff had received face to face training before in-person training was paused due to Covid-19. This was delivered to Senior Tutors and key staff in Residences and the HR Case Management team to reflect that the Duty is applicable to students and staff. A session with the Department for Education HE/FE Prevent Coordinator in May had to be cancelled. However, this was rearranged for September. Members of the Freedom of Expression Standing Advisory Group, Duty Deans and members of the College Education Committee were invited. The session was well attended and resulted in positive feedback. Face to face training was reviewed at the end of the academic year as normal, and further staff have been identified for this academic year. The KCL "Safeguarding at King's" e-module which includes a section on the Prevent Duty will be further disseminated to staff during 2021.

IT and Research

Digital Safety during Covid-19: Safeguarding from Harmful Influences Online guidance has been created and is positioned within the Safeguarding webpages. This content was based on guidance produced by [Let's Talk About It: Working together to Prevent Terrorism](#). A further article titled, "Staying Safe Online", has been published on Student Services Online to provide guidance to students about general safety online. Guidance was reissued to the KCL IT helpdesk to ensure that any queries from staff or students relating to security sensitive research (SSR) are directed to the Research Governance Office in the first instance. This is to ensure that all SSR research is conducted on a King's device, advice on conducting a risk assessment is provided, and appropriate supportive measures are in place. Our School of Security Studies already has established processes in place for managing SSR; however, for research within other faculties, the Research, Management & Innovation Directorate has created guiding principles, a local process and appendix as an interim measure which has been included on webpages and disseminated to faculties. In order to safeguard the welfare of our staff and student researchers, the Research, Management & Innovation Directorate has prioritised the completion of a new Security Sensitive Research Policy during 20/21 to replace the current Controversial & Dangerous Research Policy.

Name	The Rt Hon the Lord Geidt GCB GVCO OBE QSO FKC
Signed	
Date	24 November 2019

Appendix 1: Prompts when considering the declarations

While it is for each provider to determine how best they assure themselves that their institution has demonstrated due regard to the Prevent duty and they are able to sign the declarations to OfS satisfactorily, the prompts below may guide how governing bodies and proprietors can gain the necessary assurance.

- How have Prevent-related policies or processes been monitored e.g. relating to external speakers, welfare or safeguarding processes, and is there assurance that they are effective?
- Have you been provided with appropriate information and evidence that the provider is demonstrating due regard through relevant reports, updates etc.?
- Have staff assured you that the risk assessment has been reviewed in the past 12 months, and outlined any material changes of risk (and mitigations in response)?
- Have staff reported any serious incidents; and if so, have you been assured by how the provider has acted, including responses to any lessons learned? Equally, have you been notified of any near misses, and again, been assured that any lessons learned have been acted upon?
- Have you been assured that Prevent has been implemented in a proportionate and risk-based manner, including considering the duty alongside other statutory obligations e.g. freedom of speech?
- Is there visible and demonstrable ownership of Prevent at a senior level at the provider?
- Are you assured that staff have received sufficient training and awareness raising to implement Prevent effectively?
- Has the provider continued to work in partnership with its Prevent partners, including statutory agencies and students?
- **Covid-19:** Have the following been considered?
 - How coronavirus may have impacted the risks of radicalisation within a provider's setting; for example, any impact from a move to blend provision between online and physical teaching; and as a consequence, risks associated with complying with the Prevent duty more broadly. Providers should also be taking actions to address any changed or increased risks identified.
 - How coronavirus has impacted the implementation of Prevent-related policies such as external speakers and events policies, welfare or safeguarding policies or provision.
 - How Prevent-related policies can remain effective in future to reflect any new operating context.

Further information and advice available from:

Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards:

https://www.officeforstudents.org.uk/media/3e9aa5d3-21de-4b24-ac21-18de19b041dc/ofs2018_35.pdf

Supplementary information note to our monitoring framework:

https://www.officeforstudents.org.uk/media/19b94eed-d2ad-4a9b-bb92-ee0b410a1f1f/ofs2018_35_a.pdf

Committee of University Chairs illustrative practice note on Prevent:

<https://www.universitychairs.ac.uk/wp-content/uploads/2017/12/Illustative-Practice-Note-2-Prevent-Strategy-REVISIED-2017.pdf>

KING'S COLLEGE LONDON
AUDIT, RISK AND COMPLIANCE COMMITTEE
ANNUAL REPORT 2019-20



1. INTRODUCTION

- 1.1 In the absence of a currently published standard for audit committee reports for Higher Education Providers in England, this report has been prepared in line with the OfS Audit Code of Practice which was in force for the 2018-19 year.
- 1.2 The report reviews the adequacy and effectiveness of the university's management of risk, considers the findings of both internal and external audit for the academic year 2019-20 and comments on any significant issues identified up to the date that it has been prepared. It also comments on the adequacy and effectiveness of internal control, governance and arrangements for securing economy, efficiency and effectiveness (VfM). Finally, this report comments on the adequacy and effectiveness of the university's arrangements for the management and quality assurance of data submitted to a number of public bodies, such as the Higher Education Statistics Agency (HESA), the Student Loans Company and the OfS.
- 1.3 This report is addressed to the Principal and the Council of King's College London. It will also be shared with the OfS and Research England, if requested.

2. COMMITTEE MANAGEMENT AND ENGAGEMENT

- 2.1 The Audit, Risk and Compliance Committee (ARCC) met three times during the year and reviewed at each of its meetings the ongoing arrangements for the management of risk as well as a broad range of internal audit reports. In view of the COVID-19 pandemic and government advice against all but essential travel into work, the third of these meetings was conducted online, using the university's standard video conferencing application, Microsoft Teams. A decision has been taken to remain online for Council meetings and meetings of its major standing committees until at least Easter 2021. Therefore, the meeting which received the annual accounts for the 2019-20 year and the accompanying auditors' letter for the ARCC to consider and recommend to Council for final approval was held online on 03 November 2020.
- 2.2 Mr Paul Cartwright joined the ARCC on 01 August 2019 and took over the chair from Mr Andrew Summers CMG, who was standing down from the chairmanship of the committee after eight years. The Committee wishes to express its thanks to Mr Summers for his leadership over those years and for his engagement with the business of the university. Mr Cartwright chaired his first meeting in November 2019. The position of staff Council member has remained vacant during the year, following the retirement of Professor Brian Holden Reid, who had also served the maximum term on College Council. This position has now been filled and, subject to Council approval, all positions on the ARCC for the 2020-21 year will be occupied.
- 2.3 At the end of the 2019-20 year, two members left the Committee on having completed their maximum terms. These members were Ms Sarah Hopwood, a co-opted independent member and Professor Susan Brain, a staff member. The student member of the ARCC, Mr George Warren, also departed the Committee prior to the submission of his doctoral thesis. The Committee wishes to express its gratitude to all three members for their active participation in the business of the ARCC during their period of membership. The Committee has identified successors to the staff and student members, through an open and competitive process of advertisement and interview. The process to find a new independent co-opted member has been managed by the Executive Search team in the university's HR Department. The Council will be asked to approve these appointments

at its November 2020 meeting and the appointees will be invited to attend the earlier ARCC meeting in the capacity of observer.

- 2.4 Mr Cartwright has continued the practice of his predecessor in ensuring that regular meetings and discussions take place between the Chair of the ARCC and the Director of Business Assurance, who line-manages the Internal Audit Department. The Director of Business Assurance is a direct report to the College Secretary. During the year, the Chair of the ARCC has also had access to the Assistant Director of Business Assurance (Audit), who manages the day-to-day work of the internal audit function. The independence of the internal audit function from university management is ensured through these on-going relationships between the Chair of the ARCC and the Director and Assistant Director of Business Assurance.
- 2.5 The Chair is also in regular contact with senior members of the Executive outside of the ARCC meetings, most particularly the Senior Vice President (Operations), the Senior Vice President (Quality, Strategy and Innovation) and the Chief Finance Officer. During the recovery period from the COVID pandemic lockdown, the Honorary Treasurer and Chair of the Finance Committee has arranged weekly finance briefings, which the Chair of the ARCC has joined.
- 2.6 The Chair of the ARCC and the Chair of the Estates Strategy Committee (ESC) have jointly commissioned the Director of Estates to assist in the process by which the Committees assured themselves that the Executive was appropriately addressing the issues raised by fire safety issues at the Champion Hill halls of residence. This external review continues and the Chairs of the ARCC and ESC meet regularly with the Senior Vice-President (Quality, Strategy and Innovation) and the Director of Estates to follow progress.
- 2.7 During the year, the Committee had the opportunity to understand the management of key risks with senior officers of the university who have been invited to the ARCC meetings to engage directly with the members in discussion sessions. An important development introduced by the new Chair has been the discussion of forward business of the ARCC at the start of each meeting as a standing item. This allows members to engage in the planning of future agendas and to reach broad agreement about the areas of the university's activity which should be the focus for audit work. The Committee also reviewed the university's purchasing arrangements through the Annual Procurement Report, as part of its broader assessment of the approach to the achievement of value for money. Matters concerning internal controls, governance and arrangements to support data quality have principally been discussed with the ARCC through the reports of the Internal Audit, Compliance Assurance and Research Assurance functions.
- 2.8 It is important to note that a great deal of Committee time in the 2019-20 year was taken up with discussions arising from the COVID pandemic and the attendant risks to the university. The pandemic has disrupted the normal work of the university and has required a considerable amount of effort to be expended to incident management and business recovery planning. It also impacted on the Internal Audit plan and disrupted the business calendar of the ARCC, with a number of emergency items having to be inserted at short notice.

3. RISK MANAGEMENT

- 3.1 The ARCC has responsibility for reviewing the adequacy and effectiveness of the risk management processes of the university on behalf of College Council. In previous years, members have been assisted in this respect by regular reports from the Enterprise Risk Management Committee (ERMC), the membership of which comprises of the entire Senior Management Team (SMT). During the pandemic period, two of the three meetings of the ERMC were cancelled, and it did not sit for twelve months between September 2019 and September 2020, meaning that the ARCC did not receive specific reports from the university leadership on risk management for much of the year.
- 3.2 In requesting a discussion about how the principal risks to the university were being managed during this period, the Chair of ARCC became concerned that effective routine mechanisms for

demonstrating the effectiveness of risk management at the university were lacking. It was of particular concern to the Chair that the request for such a discussion brought a series of fresh management activities to produce the material to support the discussion, when a more mature and embedded approach would have meant that those materials would have been to hand as part of routine management reporting. In the opinion of the Committee, this led to a conclusion that the discussion of risk management was not happening as explicitly or as frequently as it would have wished and the ARCC questioned whether the discussions and decisions were happening at the appropriate level.

- 3.3 Discussions on this subject between the Chair of the ARCC and the Senior Vice President (Quality, Strategy and Innovation) have led to the university undertaking a refresh of its Enterprise Risk Management processes. This refresh will make the Revenue and Expenditure Review Committee (RERC) more directly accountable for the management of enterprise risk, with the Strategy, Planning and Analytics Directorate taking the lead role in supporting and facilitating this effort. The ERM will continue to sit twice a year to provide a platform for risk assurance with the key leaders of the university and will be co-managed by the Director of Strategy, Planning and Analytics and the Director of Business Assurance. The new arrangements are designed to ensure a more effective division of responsibility between risk management and risk assurance. Members of the ARCC are supportive of the new approach and look forward to seeing progress in this area over the 2020-21 year and beyond.
- 3.4 As part of its ongoing review of specific risk topics, the Committee received presentations from senior members of the university's management team for discussion on the following key areas at its meetings during the year:

- **The International Strategy**

The Director of International Strategy led a panel discussion on the on-going work to embed the International Strategy in the university. It was noted that this was a ten-year vision, underpinned by three central themes of King's identity, globalisation at home and global reach. Members were told that internationalisation was becoming more important, with an increasing number of research funding opportunities coming from outside the UK. International input was also increasingly important in Education, where there are now three times more joint or dual degree awards than there were four years ago. Much of the impetus comes from the 2029 Strategic Vision where serving the world is the key. The Committee learnt that the design of the strategy was being done collaboratively with students, with the International Sub-Committee of the Academic Board responsible for its delivery. It is well understood in the university community that it needs to be embedded still, and management is taking a soft approach so as to embed the strategy through existing mechanisms in order to get to where the university wants to be in ten years' time.

- **The Delivery of IT Services**

The ARCC members held a panel discussion with a group made up of some of the key contributors in delivering IT Service and some of their main customers. The discussion was led by the Chief Information Officer and also included the Chief Operating Officers of the Arts & Humanities faculties and the Health faculties. The panel was also joined by Mr Alastair McAulay from PA Consulting, who has led the reviews undertaken in the university's IT Assurance Programme, which were managed by the Business Assurance Department. The discussion was based around the findings of this review work and was augmented by the presentation of a vision for future IT delivery by the IT team. It was noted that the future vision was laudable but that it would be stretching to actualise. During the discussion, it was noted that many of the building blocks for the vision were already in place. It was also noted that the key requirement was for there to be buy-in for the vision across the university community and for stakeholders and end users of the service to understand why the rigour around IT governance was needed. There was broad agreement that the proposals in the service delivery plan were sensible and the Chair asked for an update to progress in a year's time.

- **COVID-19 Incident Management and Business Recovery**

This discussion was led by the Senior Vice Presidents. The broader discussion included items specifically on incident management during the pandemic, and noted that there had been four key workstreams formed under the oversight of a 'Gold' command, which had dealt with the health aspects of the pandemic, the safe closure of the university estate whilst enabling vital research work to continue, the development of a strategy for dealing with the pressures on recruitment and the development of a strategy for bringing the university back to normal business. In terms of the managing risk, it was noted that the university was undertaking after-action reviews to understand how different parts of the organisation were viewing risks and assessing the degree of alignment with the view of Management. Some consideration had been given to how the pandemic might affect the achievements of the objectives of the Strategic Vision 2029. No new corporate risks had been identified, but some of the existing risks had been heightened. There were, however, three emerging areas of concern around:

- (i) the long-term resilience of individual members of staff despite the initial buoyancy displayed in coping with the immediate emergency,
- (ii) the effect of environmental critical factors such as racial equality issues or a likely economic recession, and
- (iii) the willingness of staff to commute into work, given public transport is likely to be the biggest risk hotspot for transmission of the virus.

The main unmitigated risk to the recovery strategy was identified as the delivery of a hybrid model of education, which was largely untested. There were cultural and technology issues in the delivery of such a model which required addressing if it was to be a successful delivery model. It was noted that the delivery model was consistent with the ambitions of the Education Strategy, but the current imperatives were forcing it to be deployed much more quickly than that Strategy had envisaged. The ARCC noted that work was being undertaken to mitigate the risk, and IT and Estates were working on finding space and technology solutions to address the issues.

- **Cyber Security**

The Chief Information Officer and Head of Cyber Security joined the June meeting of the ARCC to brief members on a significant cyber security initiative which was being planned. It was noted that the ARCC had the responsibility to report on matters of cyber security to the College Council. In order to discharge that responsibility properly, and in view of the importance and technical nature of the subject matter, the ARCC voted to form a sub-committee which would work outside of the regular ARCC meetings, and would liaise with the senior leadership of the IT function and the Senior Vice President (Operations) in order to keep the ARCC and College Council fully briefed on developments in this area. This sub-committee consists of the Chair, Ms Sarah Wilkinson and Ms Julianne Daghish. It is supported administratively by the Director of Business Assurance, and its first meeting took place at the start of July 2020.

- **Improvement of web and mobile app accessibility**

The Director of Diversity and Inclusion presented to the Committee on the current state of the project to bring website and mobile application accessibility into line with current regulatory expectations. It was noted that the process was difficult, but it was a massive opportunity for King's, particularly in terms of providing a lever for improving student outcomes. There are three sets of compliance dates across two years. Currently, King's is not compliant but aims to be fully compliant by the final date. The project was using the Education Strategy to improve access issues around academic material. It was noted that King's, although not fully compliant, was still in the top quartile of HE Institutions in terms of the compliance, and no organisation was at that point fully compliant. It was noted that non-compliance concerned the publication of statements. Statements could have been

published to reflect what stage the work was currently at, but the university had chosen to delay until it had a more positive statement to make. The Committee was supportive of the project.

- 3.5 The Committee has continued to place great importance on closely considering the key issues and risks faced by the university as it continues to implement its strategy for growth. However, the ARCC also remains committed to being sufficiently flexible to change its forward plan to accommodate urgent matters. Clearly, this has been an important requirement in terms of helping members to understand the impacts of the pandemic on the university and the likely outcomes. However, the Committee has also exercised flexibility to substitute-in the item on cyber security in light of increased risk to the HE sector and in response to the university dealing with one particularly significant attack. The items which gave way from the ARCC forward agenda to accommodate the discussions on pandemic impacts and cyber security were the *Size and Shape* project, management of KPIs and the strategy to achieve a target operating surplus of 4%.
- 3.6 The opportunity to directly question risk owners about their chief challenges and, particularly, about their risk mitigation strategies is greatly valued by members of the ARCC, especially during this period of uncertainty as the university seeks to mitigate the impacts of the pandemic whilst still accommodating its growth ambitions.
- 3.7 During the 2019-20 year the Committee has continued to pay close attention to risks arising from legal and regulatory non-compliance. With the help of Ms Julianne Daglish, who is an ARCC member with subject matter expertise in Compliance, the Department of Business Assurance has developed a termly Compliance Report which highlights risk areas of particular concern for the Committee's attention. The report provides a Management view of compliance risk, which is underpinned by a programme of independent assurance reviews carried out by the Department of Business Assurance. The programme of reviews is determined on a risk basis, with areas of higher risk being prioritised for review and it will continue operating in the 2020-21 year, with a particular emphasis on legal and regulatory compliance risk arising out of the pandemic situation.
- 3.8 The Audit, Risk and Compliance Committee continues to maintain close scrutiny of the management of risk at King's College London. This has enabled the Committee to engage in discussion with the university leadership during the year under consideration to encourage an improvement in the embedment and maturation of enterprise risk management practices in the daily routine of management. This has led to the development of the programme to refresh the approach to enterprise risk management at the university, together with clearer lines of accountability and the clear separation of the support and facilitation of risk management and the assurance processes to underpin that. Whilst the Committee considers there is still work to be done in this area, it has also noted the willingness of all levels of management to engage in the process and anticipates improvements manifesting over the coming year. Broadly, whilst arrangements to manage the key risks may be considered adequate and effective, the formal demonstration of those actions and the monitoring of them, particularly their trajectories over time, together with the processes to provide assurance that they are working is considered in need of improvement.

4. INTERNAL AUDIT

- 4.1 The ARCC approved the Internal Audit Plan for the 2019-20 year at its June 2019 meeting. However, the plan was severely affected by the impacts of the COVID-19 pandemic. When the pandemic first hit, the decision was taken by the College Secretary and Director of Business Assurance, supported by the Chair of ARCC, to redeploy members of the Business Assurance Department into work where they could most usefully support the incident management effort. The underlying aim was to relieve pressure on departments who were at the front line of the response by not placing the added burden of responding to audits on them whilst they strove to respond to the most significant emergency incident to have hit the university since the Second World War. It was in consequence of this that the Internal Audit team were eventually furloughed

in June and July 2020 and the Audit Plan for the 2019-20 year was terminated, with the agreement of the Chair of the ARCC.

- 4.2 In order to remain flexible and responsive to change, and also to support management during the business recovery period, the Internal Audit Plan for the 2020-21 year has been divided into discrete parts, which will be sequentially approved at each of the ARCC meetings during the year. This will allow the Business Assurance Department to respond to management need and support the recovery process, but also to provide assurance in the areas where the Committee considers the most significant risks reside.
- 4.3 During this truncated year, 29 internal audit reviews were completed, together with follow-up work in relation to previous audits. Of these, three reviews were led by PA Consulting as part of the IT Assurance Programme, six reviews were undertaken as part of the Compliance Assurance Programme and two Data Governance Reviews led by the Information Compliance team. Additionally, during the year, summaries of two external reviews were submitted to the Audit, Risk and Compliance Committee for their consideration in relation to the strength of internal controls. Both reviews related to the funding of research. One was a routine audit carried out by UKRI under their Funder Assurance Programme, whilst the other was conducted by OfS, relating to data quality in the HESA Finance Return submitted by the university.

4.3.1 Strategic and Operational Management

A number of reviews were carried out during the year associated with the university's efficiency agenda and arrangements to support its strategic growth plans. These included both strategic management and value for money reviews. The following specific comments are made:

- **HR processes supporting the Equality Act 2010**

This review considered the university's policies and procedures for staff in dealing with harassment and discrimination. It noted that there was little historic recording of details around cases of alleged bullying and harassment, which causes reputational issues when the university is approached for information under Freedom of Information legislation and hinders accurate benchmarking over time. The review found that there was no central policy on recording grievances and recommended that key staff should be involved in a working group to address these issues. As a follow-up to this review, it is noted that the university formally approved a new policy and procedure on handling bullying and harassment cases in September 2020.

- **Review of cyber security**

Cyber security continues to be an evolving and growing issue and King's College London has recognised the need to minimise its organisational vulnerability to cyber-attacks. The university is currently working to improve its overall cyber security posture and maturity. The review found that the nascent cyber security function at King's has established a good foundation. Overall, it was considered that the university showed strong maturity in monitoring security incidents, managing post incidents processes. It has a less mature process around human protective controls such as security awareness.

- **University-wide data governance arrangements**

The review found that there was a lack of a clear data strategy across the university and that data governance was largely ineffective. This is particularly apparent with the governance of research data. A number of recommendations were made to help improve the situation in the medium term. The review noted that success would require sustained commitment from senior management. As a follow-up to the audit, it is noted that a senior Data Governance Steering Group, chaired by the Vice President (Operations), has been established to oversee the improvement process.

- **Study Abroad and student global mobility**

The auditors commended a knowledgeable and committed group of staff managing student global mobility. The issues noted in this review had, in many cases, already been identified,

and necessary management actions were found to be underway in most cases. Some issues were noted in connection to overlap with other similar services in the university. The auditors noted some gaps in documentation governing relationships with third parties and observed that some manual processes were susceptible to error or data loss. The review made a number of recommendations for remedial action.

- **The Research Strategy**

This audit review considered the action plan to establish if objectives in the Research Strategy had been achieved to date, and if not, to evaluate the barriers to success. The review found that many objectives had been met and others partially attained. It was noted that activity was underway to analyse the historic under-recovery of research costs. The review noted that a firm set of realistic financial targets are needed to increase accountability and provide a positive identifiable goal to work towards. Recommendations were made for improving the most significant findings.

- **Pre-implementation audit of the CoreHR system**

The auditors reported some significant deficiencies with regard to project governance, notably that the project board had not sat sufficiently often and that decisions about the project, including those relating to overruns, had been not been through the board or properly recorded. Management disagreed with the analysis and with the suggested actions, and noted that the project would be reviewed again by the incoming Senior Vice President (Operations). As a result of this review, the ARCC asked for a widescale review of project methodologies employed at King's. This will be delivered by the Business Assurance Department during the 2020-21 year.

- **HR case management**

The Case Management team was recently established and adds subject matter expertise in the area of Grievance, Disciplinary and Capability processes. The current model of dealing with grievances and disciplinaries is split between the Case Management team and People Partners. The review noted some potential downsides to this approach, including missing information flows, and recommended that the arrangement is reviewed periodically to ensure that it remains satisfactory. Data indicated that timelines were strained, and responses rarely fall within the limits prescribed in the policies. Recommendations were made to address this issue and some new regulations and procedures have been introduced, including a new policy on bullying and harassment.

- **IT Governance**

This review was undertaken by PA Consulting as a key part of the university's IT Assurance programme and was intended to help support the next iteration of the IT Operating Model (KOM) by undertaking an independent assessment of how well the current model meets the needs of the university. The review recommended that the university should define more clearly what it wants from IT, and success criteria. It also suggested that an assessment should be made of all "shadow" IT functions which operate across the university to establish the real risk of ungoverned IT equipment and systems to the organisation.

- **Programme administrator shared recruitment**

This audit found that there was support amongst stakeholders for the concept of a central process of recruitment for programme administrators. Some issues were identified, such as a lack of data to support a clear evaluation of the programme, and concerns around the amount of time it would take to build mutual trust between parts of the organisation which had been used to working in isolation. The review also noted that there was still work to do to complete job designs for standard role profiles for programme administration staff. Appropriate recommendations for remedial action were made.

- **Review of IT vendor management**

This review concluded that the state of IT vendor management was functional and fit for purpose. However, some areas, including critical ones, were identified as being ready to benefit from further improvements. Recommendations were made, including the introduction of controls to minimise deviation from standard procurement directives, and the development of continuous benefits assessments.

- **Faculty Health & Safety**

This audit exercise involved a high-level review of Health and Safety management at faculty level by focusing on the safety arrangements in laboratory spaces. The review identified a number of key Management actions required, including ensuring the inspection, maintenance and repair of equipment was done compliantly and efficiently. Recommendations were made for ensuring responsibilities for this were clearly identified and recorded and for a streamlining review to take place to ensure efficiency is maximised.

4.3.2 **Financial Management and Internal Control Systems**

Work in relation to both financial management practices as well as the assessment of key financial controls has concentrated largely on departmental audits during the year. A small number of central processes were reviewed, but this area of audit work was the most significantly disrupted by the pandemic. These reports were submitted to the ARCC to assist the Committee in making its assessment of the adequacy and effectiveness of the university's internal control systems. Although a number of concerns were raised over the year in terms of the existence of sound financial controls relating to routine procedures, it was noted that management had expressed their commitment to engage in the process to remediate any weaknesses identified through audit work. The following specific comments are made:

- **Review of banking and cashiering**

This report set out some of the historic challenges to cash collection and banking, some of which had arisen from the implementation of the new finance system, and also the new challenges which were emerging at the time of the review because of the COVID-19 pandemic. Most of the challenges identified by the review were already known, and it was noted that management were working towards a solution in each case.

- **End-to-end processes for booking, billing, and income receipt for Residences**

This review was commissioned following two years where there had been significant challenges around the allocation of student bedspaces. Findings included that planning activity and information flows were not joined up or sufficiently robust, data sources were fragmented and of varying quality which affected the organisation's ability to manage its activities or control its risks adequately. Recommendations were made for a remediation programme.

- **UKRI Funder Assurance Programme report**

A funder assurance review, involving testing on data from 54 research projects, raised concerns about the absence of an adequate control environment to safeguard research funding at King's. Several remedial actions were recommended, including the adoption of stronger measures to prevent the inclusion of ineligible costs in final expenditure statements. The university has demonstrated a willingness to engage in a process to improve compliance with funder terms and conditions and, despite the negative impact of the pandemic on these efforts, it continues to work towards a goal of total remediation.

A number of departmental reviews were also undertaken this year, focusing primarily on key financial controls.

- **Departmental review of FoLSM**

This routine audit review focussed on the School of Cancer and Pharmaceutical Science, although some of the issues raised in the audit were Faculty-based. The administration of research grants, TS accounts, purchasing cards and expenses was considered to be broadly in line with the Financial Regulations and documentation matched the representation on the

finance system. The review challenged some purchases for further consideration by the School and provided some recommendations for improvement going forward. Improvements to financial monitoring were also made as a result of the audit.

- **Departmental review of the English Language Centre (now King's Foundations)**

Management agreed to take action to address key issues raised during the review, relating to controls for oversight of expenses and purchase card transactions, embedding leavers' processes in a timely manner, safeguarding processes, controls over access to and storage of personal and student data, and the communication of the *King's Foundations* strategy and positioning to the wider King's community. Management also undertook to provide additional support for staff dealing with vulnerable students.

- **Departmental review of the Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care**

Several issues were found during this routine departmental audit. Most significant amongst these issues was a variability in the approach to the management of purchasing card transactions and a lack of control in relation to the purchase and distribution of store gift vouchers used for recompensing research participants. Potential data privacy risks associated with an online survey tool used by the Faculty were also identified. A number of recommendations were made, and management action plans were agreed for remedial action.

- **Departmental review of Arts & Sciences**

Two academic departments were chosen for audit testing: Theology and Religious Studies and Culture, Media and Creative Industries (CMCI) along with the King's Digital Lab (KDL) which is not an academic department. Testing of samples of expenses, purchasing cards, research grants and TS accounts raised only one significant issue relating to governance around external funding and the categorisation of research income. A management action was suggested to create a standard set of impact metrics to be produced annually and KPI's to be updated monthly. Management were found to be receptive to the remedial action plans put to them by the auditors.

- **Summer Programmes Review**

Key actions agreed following this review included clarifying and communicating the Summer Programme strategy, streamlining HR contract and payment processes to individuals, embedding a robust leavers' process, investigating alternative methods of ensuring robust safeguarding whilst a process to improve DBS management was undertaken, and reviewing controls around data privacy and security.

4.3.3 Data quality

In view of the growing importance of data systems and processes to support integrity, security and privacy, a number of specific data governance and quality reviews were undertaken in addition to the widescale review of data governance arrangements for the university, which was undertaken as a more strategic review. These targeted reviews included:

- **CoreHR pre-implementation of data governance measures**

This review was commissioned by the Director of Human Resources to provide assurance that measures taken to protect data and ensure the privacy of data subjects in the new HR system (CoreHR) were effective. The review found that the system was secure from a technical perspective and there was nothing of concern in the system for the first phase rollout. However, a small number of recommendations were made to improve the wider control environment.

- **OfS review of financial data submission for HESA returns**

This OfS review was undertaken to test the effectiveness of the systems and processes used to collate the 2016-17 HESA Finance record data for 2018-19, and the accuracy of the data submitted to HESA. The review found that income from some activity had wrongly been treated as business income in the data return. The errors resulted in the OfS notifying the university of an indicative reduction of £163k to quality-related business research funding. The auditors subsequently confirmed that they were satisfied with the university's Action Plan to address these issues and have formally closed the audit.

- **Data governance at the King's College London Mathematics School**

This review was conducted to provide assurance that data management practices at the Maths School are compliant with the provisions of the General Data Protection Regulation (GDPR). Overall data protection management at the School was considered satisfactory and the auditors observed good practice in the processes established since the introduction of the new data protection regulations. A small number of recommendations were made in the review, mostly to follow up on existing good practice and ensure it continues.

- **Update review of readiness for SITS Data Futures**

This report was a follow-up to a full review undertaken in the previous year, focussing on the university's readiness for the HESA Data Futures initiative. The report noted that there had been some significant delays to the external HESA Data Futures programme. This meant that the sector had no clarity on what the new ideation would look like and, as a result of the uncertainty around both timescales and scope, the Data Futures Steering Group at King's had decided that the internal preparation should be put on hold.

- **Update review of the SITS student data improvement programme**

This follow-up review of the management of the SITS student database noted a number of positive developments. These included system access and permission work being completed for the SITS client and the establishment of a portfolio structure for PACT, with associated governance structures and processes having been put in place. There was still some work to be done on data quality and systems integration, as neither strand of the Business Process Redesign project had, at the time of the follow-up, been activated because work was continuing to determine which initiatives to prioritise.

4.3.4 **Compliance Assurance**

The Business Assurance Department operates a programme of Compliance Assurance reviews which is separate from the main Internal Audit Plan. The purpose of this is to support the assurance mapping process which has been adopted for compliance and to include flexibility for the reviews to be focussed on areas which might be of special concern for either management or the ARCC. The reviews undertaken in the 2019-20 year were:

- **Compliance with provisions for Students Unions in the Education Act (1994)**

The Education Act (1994) places a number of obligations on the King's College London Students' Union (KCLSU) and the university, relating to governance and financial documentation, democratic process and the rights to resign from membership. The review concluded that the university and KCLSU were compliant with the requirements of the Education Act (1994), although a recommendation was made in the review for the KCLSU to consider improvements to the signposting of governance documents on its website.

- **Reporting mechanisms for adverse incidents involving human tissue**

A breach of the Human Tissue Act took place in a study in which King's was a collaborator in October 2018. The appropriate King's body which oversees compliance to the HTA did not become aware of this issue until June 2019. The compliance review noted that there was confusion as to reporting responsibilities when there were multiple partners and interests in the study. A recommendation was made to develop a comprehensive mechanism for reporting

such events and ensuring that its existence is publicised to all research teams that use human tissue in their studies.

- **Ongoing compliance with the OfS Conditions of Registration**

A Compliance Review was established to ensure that there are mechanisms to ensure the university meets its ongoing conditions of registration. The review assessed compliance using the annual report of the Students and Education Directorate to assess compliance. Based on the annual report from SED and examination of additional supporting evidence obtained during the compliance review, there was a strong basis on which to support the contention that King's will be able to continue to meet the ongoing conditions of registration of the Office for Students.

- **Compliance with Fundraising Legislation and Regulation**

As charity Trustees, the Council is responsible for ensuring that the university's fundraising processes are carried out in accordance with the Charities Act and the guidance of The Charity Commission and the Fundraising Regulator's Code of Practice. The College Secretariat is currently working with Fundraising and Supporter Development in order to develop a robust methodology for providing improved support to the Council to help members to meet their obligations relating to fundraising oversight, including identifying improved engagement methods, such as a regular opportunity for members to scrutinise the fundraising strategy at Council meetings or breakfast briefings.

- **Estates Assurance – Fire Risk Assessments**

Initial audit work in this area raised a degree of doubt as to whether the university was fully compliant with the current legislation around fire safety. More detailed follow-up work established that the university was fully compliant with legislative and regulatory requirements. However, it has set itself a more onerous standard regarding Fire Risk Assessments than is expected by the law and is currently unable to meet that standard because of resourcing constraints. The review has raised some issues around communication, given that the standard has been designed by one department for another department to fulfil.

- **Compliance with DfE guidance on post-lockdown return to campus**

The Business Assurance Department provided the committee with an assurance report on the university's process for returning to campus after the pandemic lockdown. It was noted that the guidance had been followed closely in most areas, and where a different approach had been taken, the rationales were clear and documented. A small number of recommendations were made for the ongoing oversight group to maintain watch over certain elements of the return.

Other compliance assurance reviews are currently underway to update the annual review of OfS registration conditions and compliance with the 1994 Education Act in respect of the university's duties towards student union membership. The university's arrangements to become compliant again with UKRI funder terms and conditions are also being reviewed currently, as well as the steps taken by the university to ensure that it is compliant with the UUK's Concordat to Support Research Integrity. These will be reported at the November 2020 ARCC meeting.

4.3.5 Other audit work

In addition to the work undertaken by the Internal Audit Department within the university, the auditing of European Union FP7, Horizon 2020 grants and certain "end of grant" accounts is sub-contracted to a third-party audit firm, CG Lees. During the year, CG Lees conducted 22 audits on projects to certify costs. The Director of Business Assurance and Director of Research Assurance met with their representatives and the Engagement Partner was able to confirm that, from the work they had undertaken during the year, they believe that the control environment in relation to the management of grants was generally sound and operating well, although they supported the internal audit recommendations for more work to be done on training of research teams around procurement protocols.

4.3.6 Investigations and lessons-learnt

In addition to the above reviews, the Department of Business Assurance also conducted four preliminary investigations following allegations made in a public interest disclosure.

- Two investigations arose from allegations of bullying and harassment. Both cases were referred to other processes within the university for further action as a result of the preliminary investigation.
- One investigation was into an allegation of wrongful dismissal and misuse of employment legislation. The preliminary investigation found that an HR panel had already been convened to hear the complaint of the former member of staff who had been dismissed, and therefore recommended no further action be taken for this third-party disclosure.
- One investigation followed an allegation of a breach of professional standards in teaching and misconduct. The preliminary investigation found that the event which was the subject of the disclosure had taken place at another institution and, despite the person accused of the breach of professional standards being employed at King's also, there were no grounds to refer this case for further actions.

- 4.4 With the exception of the pre-implementation review of the CoreHR system, where the Chair asked for a further review of the university's approach to project management to be undertaken, the members of the Audit, Risk and Compliance Committee were able to approve all the recommendations, management responses and action plans contained in the audit reports produced.

5. EXTERNAL AUDIT

- 5.1 Ms Fleur Nieboer and Mr Stephen Lucas presented the external audit findings on behalf of KPMG at the Audit, Risk and Compliance Committee meeting on 03 November 2020. Ms Nieboer reported that she expected to issue a final report with no modifications and a number of positive opinions on the accounts to the College Council later in the month.
- 5.2 It was reported that work had been concluded on the validation of the land valuation project and that the auditors had also taken into account the key impacts from COVID throughout their work on this audit and had summarised them in the report. This was especially important in terms of *going concern*. The pressures of the external environment meant that the financial sustainability of the university had been tested extensively by the auditors. Taking into account liquidity and the cash balance position, the auditors had no concerns about material uncertainty. It was also observed that the external audit had also taken into account loan covenant compliance and that the review of covenants had raised no concerns. The auditors also reported that there were no significant concerns over the areas of significant audit risk, which had been set out in the audit strategy in June. These were revenue recognition, journals and the land valuation.
- 5.3 The auditors also reported their findings on the key areas of management judgement. In relation to the provisions for pensions, it was noted that the assumptions of the university about future staffing numbers and payroll appeared to be balanced and reasonable ones. The external auditors also noted that they had undertaken work to confirm that the approach and assumptions employed in the land valuation represented balanced judgements. The subsidiary audits had raised no issues of concern. One recommendation had been made in the audit report, which related to controls over research income. However, it was noted that management were already putting a new system in place to address this specific concern.
- 5.4 Only one audit difference had been identified, which related to the treatment of research income and amounted to £980k. This amount had been adjusted in the accounts. Ms Nieboer noted that the performance in relation to adjustments had been excellent for an institution of the size and complexity of King's.

- 5.5 In conclusion, Ms Nieboer confirmed the independence of the auditors and highlighted the non-audit fees charged to King's by KPMG during the year, none of which breached the limits which need ARCC approval.
- 5.6 The members expressed overall satisfaction with the results of the external audit and recommended the external audit report (ISA260) to the College Council to be approved.

6. PURCHASING

- 6.1 At its February meeting, the Audit, Risk and Compliance Committee noted the update report on the strategic improvement plan put forward by the Chief Procurement Officer. The Chief Procurement Officer attended the meeting to answer questions from members and to present the next steps for the ongoing Procurement Improvement Plan. The Committee observed that some significant progress had been made in the first year of the plan and looked forward to more progress being made through the implementation of the further plans put before them.
- 6.2 The ARCC approved time to be allocated in the Internal Audit Annual Plan in June 2020 for a review to support the improvement work being undertaken by the Chief Procurement Officer.
- 6.3 In general terms, members noted the efforts made by the Purchasing Services team to put in place initiatives aimed at reducing the cost, adding value or improving the service that the university obtains from the funds that are available.

7. CONCLUSIONS

- 7.1 The Audit, Risk and Compliance Committee are able to comment on the adequacy and effectiveness of internal control and risk management systems within the university as well as the arrangements for securing value for money. The Committee has reviewed a broad range of internal audit reports as well as reports concerned with purchasing and risk management. It has discussed at length the comments and findings of the external auditors following their annual audit. This included undertaking an assessment of the following key areas:
- the effectiveness of the key financial and other administrative systems
 - the effectiveness of budgeting and financial monitoring processes
 - the extent to which managers comply with the university's approved financial regulations and procedures and best practice guidelines
 - the adequacy and effectiveness of risk management, governance and the arrangements for securing value for money
 - data integrity
- 7.2 To support the Audit, Risk and Compliance Committee in its requirement under the OfS Audit Code of Practice, the Director of Business Assurance has given his opinion on the whole framework of internal control, based on the work of the internal audit function throughout the year. This concluded that internal controls were generally soundly based and that, where deficiencies had been found, managers were engaged to improve the system of control. Major financial systems and reporting mechanisms were generally adequate and effective and that there was evidence to support the conclusion that managers seek and achieve value for money in the management of their various functions and activities.
- 7.3 Members of the ARCC also received a management representation from the Senior Management Team to assist them in providing an opinion on the adequacy and effectiveness of the university's arrangements for risk management, control, governance, data assurance and value for money (see Annex A). This confirmed management's opinion that the university's systems of internal control had operated in a generally effective manner throughout the year to 31 July 2020.
- 7.4 In drawing together its conclusions in respect of the university's arrangements for risk management, control, governance, data assurance and value for money, the ARCC considered the work of both the internal and external auditors, as well as the management representation from

the Senior Management Team. Furthermore, members also noted that the university has a dedicated procurement function to ensure that the value for money is achieved from the range of suppliers providing services across the university. There was also evidence that managers are willing to make changes to systems and procedures in response to audit recommendations to secure greater value for money.

- 7.5 Members of the Committee also considered that the major financial systems were subject to continuous review. Where reports by internal or external auditors raised control issues, the Committee sought assurance that the necessary improvements were being addressed or that any risk being carried was fully understood. Activity to remediate control weaknesses is monitored through reports to the Committee.
- 7.6 The Committee has been engaged directly with Management in regard to the improvement of systems to manage risk and, in particular, the processes by which risk is monitored, mitigated and reported throughout the institution. The senior leadership of the university has responded by making changes to processes to produce the improvement recommended by the Committee. The Committee noted that management are aware of the need to manage risk effectively and are currently content that the university is engaged in an appropriate improvement programme which will support the cultivation of an effective risk management culture within the organisation.
- 7.7 In this respect, the Committee was able to endorse the university's statement of internal control for the financial year 2019-20.
- 7.8 Based on the Audit, Risk and Compliance Committee's review of internal audit reports, risk management arrangements, the external auditors' findings, and Management's Letter of Representation, members were able to support the judgement that:
- The university's arrangements for control and governance were both adequate and effective
 - The university's arrangements for securing value for money were both adequate and effective
 - The university's arrangements for the management and quality assurance of data submitted to the Higher Education Statistics Agency, the Student Loans Company, OfS and other bodies were both adequate and effective.
 - The processes by which the university manages its key risks is likely to be adequate, but arrangements for monitoring and reporting risk are currently subject to some improvements. The Committee is confident that, given the engagement of management in this respect so far, the changes will produce an overall system of managing risk which is both adequate and effective.
- 7.9 The Committee has developed strong foundations upon which to continue its work in 2020-21. The principal aspiration of the ARCC for the next year will be to encourage the development of the risk management framework, building on previous successes, to ensure that the key processes are systematised in a way that promotes effective operationalisation and robust assurance. The Committee will also focus on ensuring that the external review and lessons learnt process related to the Champion Hill fire safety issues are brought to a successful conclusion and that the measures for improving the university's cyber security posture are properly supported and adopted through the institution. It is a longer term aspiration of the Committee to introduce a Board Assurance Framework, which will link to the work of the Executive in managing the key risks, the work of the internal and external auditors, and draw on other sources of assurance, both those presented by management and those derived from external agencies.

Mr Paul Cartwright

Chair – Audit, Risk and Compliance Committee

King's College London

November 2020

MANAGEMENT REPRESENTATION

Report for Members of Audit, Risk and Compliance Committee

- 1) This report has been prepared by the Senior Management Team for Members of the Audit, Risk and Compliance Committee in order to assist them in providing an opinion on the adequacy and effectiveness of the university's arrangements for risk management, control, governance, data assurance and value for money.
- 2) In order for Members to receive the required level of assurance in giving this opinion, the Senior Executive Team has made the following representations:
 - Law and Regulations – we are not aware of any actual or potential breaches of laws and regulations, other than those reported to the Audit, Risk and Compliance Committee and/or Finance Committee, which could have a financial impact on the Financial Statements for the year ended 31 July 2020.
 - Fraud - we are not aware of any actual or suspected frauds, other than those reported to the Audit, Risk and Compliance Committee and/or Finance Committee, which could have a financial impact on the Financial Statements for the year ended 31 July 2020.
 - Related Party Transactions – we confirm the completeness of the information provided to the external auditors regarding the identification of related parties and regarding transactions with such parties that are material to the Financial Statements. The identity of, and balances and transactions with, related parties have been properly recorded and, when appropriate, adequately disclosed in the notes to the Financial Statements. We are not aware of any other such matters required to be disclosed in the financial statements.
 - Internal Control – we confirm that a generally effective system of internal control has been in operation throughout the year to 31 July 2020. A small number of areas have been identified where there have been control failures or established controls have operated sub-optimally. In these events, the issues have been reported to the Audit, Risk and Compliance Committee and, where appropriate, College Council. In each case, steps have been taken to mitigate the effect of the failures and prevent recurrence.
 - Risk Management – Whilst the pandemic situation has meant that formal processes for the consideration and reporting of risk has been suspended for much of the year, Management have kept the key risks to the university in view throughout the year to 31 July 2020. An improvement process is currently in train for the formal recognition and reporting of corporate risk management activity.
 - Data integrity – any identified breach of data to the year end 31 July 2020 has been handled in accordance with the relevant university policy and cases which have required reporting to the Information Commissioner's Office have been notified to the Audit, Risk and Compliance Committee as appropriate. This remains a key area of concern and focus for senior management.

For and on behalf of the Senior Management Team
November 2020

Annual report of the Director of Business Assurance 2020-21

EXECUTIVE SUMMARY

1. This report reviews the work of the Internal Audit Department of King's College London for the financial year 2019-20 and comments on significant issues identified to date. It is submitted to the Principal, the Audit, Risk & Compliance Committee and members of College Council.
2. The Director of Business Assurance continues to report directly to the College Secretary but has rights of direct access to the Chair of the Audit, Risk and Compliance Committee (ARCC), the Principal and the Chair of Council on audit matters. These rights of access have not been exercised during the year, although the Director of Business Assurance has continued to have regular discussions with the Chair of ARCC over the year as part of a continual update process. The new Chair took office in August 2019 and chaired his first meeting of the ARCC the following November.
3. During the year, 31 audit and assurance reviews were completed together with comprehensive follow-up work in relation to previous reviews. The audit programme included a range of work aimed at informing the ARCC's assessment of the effectiveness of internal control systems, as well as work of a broader strategic nature. This included departmental reviews within faculties and support services, reviews of new corporate systems and specific studies (such as the lifecycle review of Hall of Residence booking and billing and a review of Health and Safety arrangements in laboratory areas). Where weaknesses were identified, remedial actions have been recommended and managers are engaged in a process of improvement.
4. The Business Assurance department has continued to develop a full programme of compliance assurance across the university. Good compliance management continues to be viewed as an important component of risk management. The Business Assurance department is currently developing a more focused model of risk assurance to support the university's refresh of Enterprise Risk Management.
5. We have continued to embed a programme of IT Assurance over the past year in collaboration with PA Consulting. Reviews this year have focussed largely on IT Governance, and latterly we have been working with management to scope a comprehensive review of cyber security.
6. Based on a combination of the audit work carried out during 2019-20 and earlier years, as well as the detailed knowledge acquired in relation to the management and governance arrangements operating within the university, the Director of Business Assurance has concluded that internal controls are generally considered to be adequate and effective, although audit work this year has identified some control weaknesses. Where issues have been raised, management has been willing to engage and consider improvements. There is evidence to support the conclusion that value for money is sought in the management of various functions and activities and that, overall, the university has an adequate and effective approach to achieving value for money, although the Chief Procurement Officer pursues a programme of continuous improvement. Governance arrangements are also considered to be adequate and effective, following comprehensive review and reform in 2018 and 2019. The arrangements for managing the risks attached to specific work packages are generally considered to be adequate and effective, however, work is underway to improve the processes by which risk is monitored, mitigated and reported more broadly throughout the institution.

Director of Business Assurance
November 2020

KING'S COLLEGE LONDON

ANNUAL INTERNAL AUDIT REPORT 2019-20

1. INTRODUCTION

- 1.1 This report reviews the work of the Internal Audit Department of King's College London for the financial year 2019-20 and comments on significant issues identified to date. It is addressed to the College Council and the Principal and is produced in the format developed to comply with the requirements of the OfS Terms and Conditions of Funding for Higher Education Institutions.
- 1.2 The Internal Audit team has carried a vacancy for the 2019-20 financial year. The savings from this vacancy have allowed for PA Consulting to undertake a deep review of IT Governance at the university. A second vacancy occurred in April 2020, when one of the remaining team took up a more senior audit role at a local authority. This was shortly after the lockdown arising from the COVID-19 pandemic began. When the pandemic first hit, the decision was taken by the College Secretary and Director of Business Assurance, supported by the Chair of the Audit, Risk and Compliance Committee (ARCC or the Committee), to redeploy members of the Business Assurance Department into work where they could most usefully support the incident management effort. The underlying aim was to relieve pressure on departments who were at the front line of the response by not placing the added burden of responding to audits on them whilst dealt with the incident at hand. It was in consequence of this that the Internal Audit team were eventually furloughed in June and July 2020 and the Audit Plan for the 2019-20 year was terminated, with the agreement of the Chair of the ARCC.
- 1.3 In order to remain flexible and responsive to change, and also to support management during the business recovery period, the Internal Audit Plan for the 2020-21 year has been divided into discrete parts, which will be sequentially approved at each of the ARCC meetings during the year. This will allow the Business Assurance Department to respond to management need and support the recovery process, but also to provide assurance in the areas where the Committee considers the most significant risks reside.

2. ACHIEVEMENT AGAINST PLAN – 2019-20

- 2.1 The internal audit plan for 2019-20 was approved at the June 2019 meeting of the ARCC.
- 2.2 In normal times, this report would summarise the achievement of the Internal Audit team against the plan set for them for the year. However, activity on that plan was effectively brought to an end shortly after the March 2020 meeting of the ARCC and when activity began again in August, the auditors focussed on the first part of the plan for 2020-21 which had been approved in June 2020 by the ARCC and had reordered priorities in the light of the pandemic. Since a significant portion of audit time was lost towards the end of the year to the COVID-19 pandemic and lockdown, this report will not attempt to gauge the achievement against the plan laid out in June 2019. Instead, this report notes that sufficient reviews were undertaken across a balanced portfolio of audits to assist the members of the Audit, Risk and Compliance Committee in coming to their conclusions in their report to Council and the Principal.
- 2.3 Notwithstanding the changes to the plan, a number of audit reviews have still been undertaken in academic departments, focussed on the operation of core financial controls and administrative processes. These have taken place in the English Language Centre (now known as King's

Foundations), the Summer Programmes department, The Faculty of Life Sciences and Medicine, the Florence Nightingale Faculty of Nursing, Midwifery and Palliative Care, and the Faculty of Arts and Humanities.

- 2.4 The compliance assurance programme has included work on the OfS ongoing Conditions of Registration, and compliance with a number of specific regulatory of legal requirements, such as the conditions laid out for Student Union membership in the 1994 Education Act, fundraising, fire safety in university buildings, and compliance with the guidance issued by the DfE for universities to return to normal business on their campuses.
- 2.5 The auditors have undertaken a number of studies which looked at central processes and systems, such as the implementation of the new CoreHR system, a lifecycle review of residences advertising, booking and billing, and a review of banking and cashiering. A review of the new arrangements for sharing programme administrators across departments looked at the professional services which are embedded in faculties and another review considered arrangements for personal tutoring. At the strategic level, the auditors also conducted a progress review of the Research Strategy, assessing it against its timescales and goals. In view of the increasing significance of data management and security, a number of reviews focussed on data governance, including a second review of the CoreHR system, and a follow-up review of data management in the SITS student records system.
- 2.6 The programme of IT audits also continued in this year, with a particular focus on IT Governance. A separate, university-wide, review considered data governance more broadly and not just through the lens of IT and electronic data. Other audit exercises included a high-level review of cyber security and IT vendor management.
- 2.7 In addition to the Internal Audit team's planned work, the department supported four preliminary investigations following protected disclosures made in the public interest (whistleblowing). Two of these allegations were referred to other university processes for detailed investigation and for a disciplinary process to be considered. The other two were found not to have grounds for further referral.

3. OUTPUT FOR THE INTERNAL AUDIT DEPARTMENT – 2019/20

- 3.1 During this truncated year, 29 internal audit reviews were completed, together with follow-up work in relation to previous audits. Of these, three reviews were led by PA Consulting as part of the IT Assurance Programme, six reviews were undertaken as part of the Compliance Assurance Programme and two Data Governance Reviews were led by the Information Compliance team. Additionally, during the year, summaries of two external reviews were submitted to the Audit, Risk and Compliance Committee for their consideration in relation to the strength of internal controls. Both reviews related to the funding of research. One was a routine audit carried out by UKRI under their Funder Assurance Programme, whilst the other was conducted by OfS, relating to data quality in the HESA Finance Return submitted by the university. The audit reviews undertaken during the year are listed in Appendix A. A programme of follow-up work has also been conducted during the year and a list of outstanding audit recommendations and agreed management actions is set out in Appendix B.

FINANCIAL MANAGEMENT AND INTERNAL CONTROLS

Work in relation to both financial management practices as well as the assessment of key controls has concentrated largely on departmental audits during the year. A small number of central processes were reviewed, but this area of audit work was the most significantly disrupted by the pandemic. The following reviews were undertaken in support of financial management practices and internal controls across the university:

- **Review of banking and cashiering**

This report set out some of the historic challenges to cash collection and banking, some of which had arisen from the implementation of the new finance system, and also the new challenges which were emerging at the time of the review because of the COVID-19 pandemic. The main risks were identified as the potential for inaccurate financial records arising from a disparity of approaches to reporting takings through the Cashiers Department from the range of local outlets which receive income on behalf of the university. Other issues identified included the use of local, unofficial, versions of invoice generation and credit control, which can have knock-on consequences for the inability to allocate income properly when it is received by the central cashiering function. The review also noted some delays in bank reconciliations which had occurred because of the implementation of the new finance system. Most of the challenges identified by the review were already known, and it was noted that management were working towards a solution in each case.

- **End-to-end processes for booking, billing, and income receipt for Residences**

This review was commissioned by the Director of Students and Education, following two years where there had been significant challenges around the arrival of new students to halls of residence and their allocation to bedspaces. The review objectives were to understand the processes, both from an organisational efficiency and a student experience perspective and to identify any potential risks, weaknesses and control gaps. The broad findings included that planning activity and information flows were not joined up or sufficiently robust, data sources were fragmented and of varying quality which affected the organisation's ability to manage its activities or control its risks adequately, communication to applicants was disjointed because they are controlled by a number of different teams and that risk management, including contingency planning, is not holistic for this part of the residences' operation. Several management actions were suggested as part of a programme of remediation.

- **UKRI Funder Assurance Programme report**

A funder assurance review, involving testing on data from 54 research projects, raised concerns about the absence of an adequate control environment to safeguard research funding at King's. The review noted that there was a lack of evidence of communications between the Post Award team and budget holders, which was causing significant issues. The remedial actions recommended included the full review of the control environment for research grant expenditure and the implementation of appropriate remedial actions, the improvement of travel and expense policies in regard to research, and the adoption of stronger measures to prevent the inclusion of ineligible costs in final expenditure statements. The university has demonstrated a strong willingness to engage in a remediation process to improve its levels of compliance with funder terms and conditions and, despite the negative impact of the COVID-19 pandemic on these efforts, it continues to work towards a goal of total remediation.

A number of departmental reviews were also undertaken this year, focusing primarily on key financial and management controls:

- **Departmental review of the Faculty of Life Sciences and Medicine**

This routine audit review focussed on the School of Cancer and Pharmaceutical Science. Unlike other Schools in the Faculty, this one has two Joint Heads of School, but there were clear demonstrations that both sides of the School were working together as much as possible and trying to create synergies. The School has been successful in making significant progress in business continuity planning and in improving internal communications. Several of the issues raised in the audit were considered to be Faculty issues rather than just relating to the School of Cancer and Pharmaceutical Science. The auditor took samples of research grants, TS accounts, purchase card statements and expenses and reviewed them to ensure that expenditure was in line with the Financial Regulations and that documentation matched the representation on the finance system. It was noted that purchasing card administration needed to be realigned to properly reflect the reconfiguration. The review challenged some purchases for further consideration by the School and provided some recommendations for improvement going forward. At the start of the audit, there was little financial transparency, with management accounts only available at Faculty level and the School receiving no financial information directly from the Finance Department. During the audit, the information held centrally on staff establishment and NHS recharges was corrected by the School. Other recommendations were made to improve the accuracy of the management accounts.

- **Departmental review of the English Language Centre (now King's Foundations)**

Management agreed to take action to address key issues raised during the review, relating to controls for oversight of expenses and purchase card transactions, embedding leavers' processes in a timely manner, safeguarding processes, controls over access to and storage of personal and student data, and the communication of the *King's Foundations* strategy and positioning to the wider King's community. Management also undertook to provide additional support for staff dealing with vulnerable students.

- **Departmental review of the Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care**

Several issues were found during this routine departmental audit. Most significant amongst these issues was a variability in the approach to the management of purchasing card transactions with a number of purchases remaining unverified, unapproved, or unsupported by documentary evidence and a lack of control in relation to the purchase and distribution of store gift vouchers used for recompensing research participants. Issues were also identified with the HR joiners and leavers' processes, particularly in terms of the removal of systems access for leavers. Expenses claims were found to be incomplete in terms of supporting information and one transaction in the auditors' sample was found to be for an ineligible purchase. Potential data privacy risks associated with an online survey tool used by the faculty were also identified. A number of recommendations were made, and management action plans were agreed for remedial action.

- **Departmental review of Arts & Sciences**

This review noted that the Faculty of Arts and Humanities has a different administrative design to other faculties and is organised into three broad clusters of academic disciplines. The auditors found this to be an effective approach. Two academic departments were chosen for

audit testing: Theology and Religious Studies and Culture, Media and Creative Industries (CMCI) along with the King's Digital Lab (KDL) which is not an academic department. Financially, there are concerns for Arts and Humanities as it has missed its income target for the last three years by between £1-4m, with a constant income of around £25m, but with increasing targets in line with the expectations of the university. The causes were identified as a mixture of over ambitious targets and under performance in student recruitment. Testing of samples of expenses, purchasing cards, research grants and TS accounts raised only one significant issue relating to governance around external funding. More than £300k of funding was mis-categorised as a donation rather than research and administration of the money was found to be sub-optimal. It was concluded that cluster administration dealt effectively with expenses and purchase cards but research grants administration in RMID needed to carry out housekeeping on six out of the 12 grants selected for testing. The King's Digital Lab is a research software engineering centre within Arts and Humanities, which works with colleagues wanting to include an external digital component to their research. Income comes from their share in research projects and external consultancy. Cost recovery for consultancy was found to be an issue with the unit charging a below-commercial rate in order to remain competitive. The auditors noted that a clear future strategy was required for this group. One concern was that the management accounts did not reflect the value of the Digital Lab to the university in gaining research grants, and management action was suggested to create a standard set of impact metrics to be produced annually and KPI's to be updated monthly. Management were found to be receptive to the remedial action plans put to them by the auditors.

- **Summer Programmes Departmental Review**

This planned departmental audit review set out to understand and document the financial and HR processes within Summer Programmes as well as to review the roles and responsibilities, policies and governance structures for managing financial and HR processes through sample testing. Management agreed to take action to address key issues raised during the review, which included the development of safeguarding processes to support the recruitment of new Tutors and Student Ambassadors teaching on Pre-University Summer Programmes until a full DBS process can be agreed, the streamlining of HR contract and payment processes, the embedment of a robust leavers' process, and the review of controls over access to and storage of personal data.

STRATEGIC AND OPERATIONAL MANAGEMENT

A number of reviews were carried out during the year associated with the university's efficiency agenda and arrangements to support its strategic growth plans. These included reviews of both strategic management and operational control. The audits undertaken are summarised as follows:

- **Review of HR System Implementation Project Governance**

The auditors reported some significant deficiencies with regard to project governance, notably that the project board had not sat sufficiently often and that decisions about the project, including those relating to overruns, had been not been through the board or properly recorded. Management disagreed with the analysis and with the suggested actions, and ultimately, the project was to be reviewed again by the incoming Senior Vice President (Operations), although essentially the risks identified by the review were accepted by management. Management actions suggested by the auditors included developing a new

governance structure, identification of the overall project sponsor, monthly updates and budgets to be presented by the Programme Director and formally minuted, that budget changes should be reviewed by the Project Board and the implementation of KPIs to monitor service take up. As a result of this review, the ARCC asked for a widescale review of project methodologies employed at King's. This will be delivered by the Business Assurance Department during the 2020-21 year.

- **HR processes supporting the Equality Act 2010**

This review considered the university's policies and procedures for Staff in dealing with harassment and discrimination. The inability to supply data about the number of incidents of discrimination in response to Freedom of Information (FOI) requests has raised concerns about reputational risk and questions about whether the university is sufficiently proactive in its recording and monitoring to be able to demonstrate that it seeks to eliminate discrimination and harassment. There have been considerable investment and improvement in technology and capacity as part of the HR Transformation project, including the establishment of a Case Management team which is responsible for managing and recording formal grievances. However, the university has no historical data to provide for future FOI requests or for internal benchmarking, and cases are recorded without any categorisation which makes future interpretation difficult. Indicators suggest that the majority of grievances are currently dealt with informally with no requirement to report to HR or that they are not dealt with at all. The last Staff Survey in 2017 reported that at least 4% of all staff had experienced bullying or harassment within 12 months of the survey. Human Resources have taken a non-interventionist stance and the review found that there was no central policy on how to record grievances. This also means that there is no internal reporting and no monitoring or analysis to provide guidance on where attention should be focused. The review noted that the new CoreHR system may not provide a simple answer, as it is likely additional software may be needed to run a separate database using anonymised data. The auditors recommended that key staff should be involved in a working group to address these issues. It is noted that the university formally approved a new policy and procedure on handling bullying and harassment cases in September 2020.

- **Review of cyber security**

Cyber security continues to be an evolving and growing issue for educational institutes of all shapes and sizes and King's College London has recognised the need to protect its critical infrastructures, information assets and business operations and minimise its organisational vulnerability to cyber-attacks. The university is currently working to improve its overall cyber security posture and maturity so that it can be more secure and resilient in order to meet the increasingly dynamic challenges of the modern HE cyber security environment, which can be summarised as having to juggle conflicts between academic openness and information security against a background of rising cyber-espionage and attacks and constraints in in-house security resources. The review found that the King's cyber security function is relatively new and in its short existence has established a good foundation from which it can build. Recommendations were aimed at the areas where the auditors believed the university would feel the most positive impact by improving its cyber security maturity level. Overall, it was considered that the university showed strong maturity in monitoring security incidents, managing post incident processes and coordinating with internal and external parties. It has less mature process

around human protective controls such as security awareness. It was noted that training in this area was not mandatory. Recommendations were made to consider remedial action.

- **University-wide data governance arrangements**

This review assessed data governance within the College. In an optimal situation, the responsibility for data governance is shared between IT and all other parts of the organisation. Therefore, the findings and recommendations of the review applied to the university as a whole, rather than the IT function alone. The review sought to understand the existing state of data governance at the university and to make a gap analysis using an established evaluation framework model that is calibrated for the Higher Education sector. The review found that there was a lack of a clear data strategy. This, compounded by the university's compromised data quality, has resulted in largely ineffective data governance. This is particularly apparent with the governance of research data. A number of recommendations were made to help improve the situation in the medium term. The review noted that success would require sustained commitment from senior management. The auditors, therefore, welcomed the setting up of a senior Data Governance Steering Group, chaired by the Vice President (Operations), to oversee the improvement process. Other recommendations included setting up a Data Governance Office (DGO) to promote collaboration and consistent approaches to data management among departments that cover the entire lifecycle of data from creation to archiving and any satisfying reporting needs, developing a university-wide data flow mapping across the key data domains, establishing meaningful and useable data quality metrics, and having role-based access controls in place to ensure read and write access privileges are available to those who need them.

- **Study Abroad and student global mobility**

The auditors found Global Mobility staff to be knowledgeable and committed to supporting students in study activities abroad, and they were able to quickly provide all information and documentation requested for the purposes of the audit. The issues noted in this review had, in many cases, already been identified, and necessary management actions were found to be underway in most cases. However, many of the issues were noted to be intertwined with broader institutional questions around the coordination of similar activities that are managed in different areas of the university. The review considered that the fragmentation of these similar services posed a challenge to establishing robust management information and to the management of risks relating to overseas travel. The review found that the strategic benefit of moving the team from External Relations to SED had yet to become apparent and that the leadership of the team were expecting the strategic direction for Global Mobility to become clearer with the publication of the Internationalisation 2029 Strategy. It was also noted that incident management mechanisms for adverse events overseas were not yet formalised and that it was not clear how students' welfare and mental health should be approached whilst they are overseas. The review also found that in some cases documentation governing relationships with third parties was absent or missing certain elements. The auditors were also concerned that a large amount of data was managed outside of enterprise systems, which led to a number of manual and paper-based processes being in place, suggesting a greater risk of data error or loss, potentially affecting students' experiences. The review made a number of recommendations for remedial action.

- **The Research Strategy**

The first research strategy for King's College London was written in 2016 and was followed by a detailed action plan published in April 2017 that showed the five pillars underpinning the strategy along with detailed objectives, milestones and responsibilities in working towards the goals. It was reviewed externally in December 2017, showing progress and highlighting areas to prioritise. This audit review considered the action plan to establish if objectives had been achieved to date, and if not, to evaluate the barriers to success. The review found that many objectives had been met and others partially attained. New awards had increased by 47% from £158m in 2015-16 to £233m in 2018-19. The university is ranked 5th in the world for impact and 6th for UK industry income. However, there had been a significant staff turnover in the meantime and the strategy was found to have lost some momentum. The university recovers less than desired costs from its research which exacerbates the shortfall in overheads from funding bodies, and core facilities have to be subsidized by the university. This review suggested that further analysis was needed in order to identify the main reasons for the under-recovery of research costs and to inform strategy. This is a complex issue and it is noted that activity is now underway to analyse it. The auditors noted that, with the introduction of Worktribe, research administration will be devolved to a greater level in the faculties which will give greater awareness of the need for accurate costing. The review noted that a firm set of realistic financial targets are needed to increase accountability and provide a positive identifiable goal to work towards. Management Information has improved with the introduction of dashboards by the Analytics team which quote the research balanced scorecard KPI's amongst other data. The Research Development team has demonstrated considerable impact on application success rates, focused primarily on large, strategic awards and early-career or fellowship awards. Recommendations were made for improving the most significant findings.

- **HR case management**

The Case Management team within Human Resources was established in October 2018. It adds subject matter expertise in the areas of disciplinary and capability matters once cases reach the formal stage. Case Management provides a standardised approach with consistent practice across the university. It can help to reduce legal costs by preventing cases from reaching the employment tribunal stage and can add an element of commercial awareness to decide objectively as to when it might be better to settle a case. Since the Case Management team has been in place, there has only been one employment tribunal hearing, which the university won. The current model of dealing with grievances and disciplinaries is split between the Case Management team who deal with the formal aspects and the People Partners who carry out the investigations. The review noted some potential downsides to this approach, including missing information flows between the two parts of the process, and recommended that the arrangement is reviewed periodically to ensure that the working model is still satisfactory. Mediation is a valuable tool but is rarely used. It was not evident that there were any trained mediation staff at the university and there is no specific budget. It is suggested that one could be created with a view to possibly training some staff within HR, or for providing external mediation. An increase in management training to deal with conflict and difficult situations arising in the workplace was also recommended. Interviews with managers who sit on panels indicated that the Case Management team provided a high level of support, although the auditors noted that data analysed during the review indicated that timelines are strained,

particularly in grievances, and responses rarely fall within the limits prescribed in the policies. Appropriate recommendations were made to address this issue. It is noted that the disciplinary and capability regulations have recently been updated and revised in concert with grievance regulations and procedures.

- **IT Governance**

This review was undertaken by PA Consulting as a key part of the university's IT Assurance programme, managed by the Business Assurance Department. It was noted that the IT operating model for King's (KOM) was implemented by the university in 2012. It has been revised since then and was significantly amended in 2018, with the introduction of Functional Planning Groups that govern how IT investment decisions are made. The IT team were noted to be updating the KOM at the time of the review with the next iteration due to be released towards the end of 2020. This review was intended to help support that next iteration by undertaking an independent assessment of how well the KOM meets the needs of the university, so that this can be taken into account in the design of the new KOM. The review recommended that the university should define more clearly what it wants from IT and the criteria by which it will measure success. It also recommended that an assessment should be taken of all "shadow" IT functions which operate across the university to establish the real risk of ungoverned IT equipment and systems to the organisation, that a cross-functional team should assess the projects management framework to ensure it is fit for purpose, and that the KOM should be adapted to take into specific account the technology and service needs of the Research community. Finally, the review recommended that there should be an identification of members of the IT team at all levels who are temperamentally best suited to take on business relationship management responsibilities and these individuals should be trained to take on relationship management roles.

COMPLIANCE MANAGEMENT

The following reviews were undertaken with respect to compliance with legal, regulatory or internal policy requirements as part of the department's consideration of risk management:

- **Compliance with provisions for Students Unions in the Education Act (1994)**

The Education Act (1994) places a number of obligations on the King's College Students' Union (KCLSU) and the university. This includes requirements to have written and accessible governance documentation which is regularly reviewed by the Union's governing body, publicly accessible annual financial statements and democratic elections for all major positions. The university is obliged to publicise that any student may choose to withdraw from the student union and not be disadvantaged in accessing certain essential services by so doing. The legislation also sets out requirements in relation to the affiliation by students' unions to external organisations and in relation to having a robust and effective complaints procedure. The review concluded that the university and KCLSU were compliant with the requirements of the Education Act (1994), although a recommendation was made in the review for the KCLSU to consider how it might improve the signposting of its governance documents on its website, as they were considered not to be intuitively accessible currently.

- **Reporting mechanisms for adverse incidents involving human tissue**

A breach of the Human Tissue Act took place in a study in which King's was a collaborator in October 2018. The study partners were the University of Manchester and the Guy's and St

Thomas' Health Trust. The university body which oversees compliance to the HTA within King's did not become aware of this issue until June 2019 and even then, it was difficult for that group to ascertain precisely what disclosures had been made to the relevant authorities. The compliance review noted that, despite a thorough investigation being done at the time and the production of a comprehensive report, there was still confusion as to reporting responsibilities when there were multiple partners and interests in the study. A recommendation was made to develop a comprehensive mechanism for reporting such events and ensuring that its existence is publicised to all research teams that use human tissue in their studies. Other recommendations were made for ensuring the reporting of this particular event conforms to the requirements of the regulator and the funder.

- **Ongoing compliance with the OfS Conditions of Registration**

When the university first registered as a provider of Higher Education with the OfS, it made representations that it conformed to a number of conditions. To maintain the registration and avoid penalties, the university must ensure that it continues to meet those conditions going forward. A Compliance Review was established to ensure that there are mechanisms to ensure this. The review used the annual report of the Students and Education Directorate to assess compliance with this requirement and tested the findings of that report against several other sources of evidence. Based on the annual report from SED and examination of additional supporting evidence obtained during the compliance review, there was a strong basis on which to support the contention that King's will be able to continue to meet the ongoing conditions of registration of the Office for Students. In order to support this work going forward the review was advised that an oversight group would be established to help monitor (a) adherence to these conditions and (b) OfS reporting timings at key points during the year. The Business Assurance team consider that the creation of that oversight group further strengthens the university's position with regards to ensuring ongoing compliance with the OfS Conditions of Registration.

- **Compliance with Fundraising Legislation and Regulation**

As charity Trustees, the Council is responsible for ensuring that the university's fundraising processes are carried out in accordance with the Charities Act and the guidance of The Charity Commission and the Fundraising Regulator's Code of Practice. This is managed in part through the Audit, Risk and Compliance Committee which seeks assurance that the university is acting in compliance with the Policy for the Acceptance of Donations. The ARCC now receives regular reports from the Fundraising Ethical Review Group (FERG) which was set up some years ago. The purpose of the FERG is to independently scrutinise prospective gifts to the university where there is an increased level of ethical or reputational risk. The College Secretariat is currently working with Fundraising and Supporter Development in order to develop a robust methodology for providing improved support to the Council to help members to meet their obligations relating to fundraising oversight, including identifying improved engagement methods, such as a regular opportunity for members to scrutinise the fundraising strategy at Council meetings or breakfast briefings. The ARCC has an important part to play in this process, in terms of scrutinising the work of the FERG on a regular basis through its termly reports, but also in receiving and scrutinising an annual Fundraising Report on behalf of the Council. The first of these reports was presented to the ARCC in February 2020.

- **Estates Assurance – Fire Risk Assessments**

Initial audit work in this area raised a degree of doubt as to whether the university was fully compliant with the current legislation around fire safety. More detailed audit work established that the university was fully compliant with current legislative and regulatory requirements. However, the university has set itself a more onerous standard regarding Fire Risk Assessments than is expected by the law and it is currently not able to meet that standard because of resourcing constraints. The review has raised some issues around communication, given that the standard has been designed by one department for another department to fulfil, with, what has appeared to the auditors, to be a minimal amount of engagement or discussion.

- **Compliance with DfE guidance on post-lockdown return to campus**

The Business Assurance Department provided the committee with an assurance report on the university's process for returning to campus after the pandemic lockdown. It was noted that the guidance had been followed closely in the majority of areas, and where a different approach had been taken, the rationales were clear and documented. A small number of recommendations were made for the ongoing oversight group to maintain watch over certain elements of the return.

The outcomes of annual update reviews of the compliance with OfS Conditions of Registration and the university's statutory duties in relation to the Students' Union will be reported to the ARCC in November 2020. This meeting will also receive compliance assurance reports on the progress in achieving compliance with the UKRI's terms and conditions and compliance with the UUK's Concordat to Support Research Integrity.

VALUE FOR MONEY AND EFFICIENCY

The following reviews were undertaken with respect to the university's arrangements to secure Value for Money (which comprises the NAO definition of efficiency, economy and effectiveness):

- **Personal Tutoring**

This review noted that each student on an Undergraduate (UG) or taught Post Graduate (PGT) programme is allocated a Personal Tutor for the duration of their course at King's. This person is a student's key contact for academic and pastoral support and signposting. Typically, the student will meet with their Personal Tutor up to four times per year, and at least once per semester. The review found that Senior Tutors were in place in each faculty to support Personal Tutors in helping and signposting their students. The review also noted that over the previous 18 months, the central Personal Tutoring Team, which sits as part of the Student Mobility & Success within the Students and Education Directorate, had undertaken many initiatives and improvements. The auditors were supportive of those initiatives, but noted the remaining risks and challenges for this area of activity and the work that still needs to be undertaken to enable the Personal Tutoring processes to be consistent, fully embedded and properly recognised as essential to student success and experience across the university. The review noted that management still had to agree the next phase of the development of personal tutoring, including allocating resources and there was still a need to develop some KPIs so that success can be measured in the future. The review also recommended some improvements to mechanisms to gather and assess feedback from tutors and students and

suggested that those responsible for the delivery of personal tutoring should consider the best ways to enhance sponsorship for the work from both executive and academic leaders.

- **Review of IT vendor management**

This review concluded that the state of IT vendor management was functional and fit for purpose. However, some areas, including critical ones, were identified as being ready to benefit from further improvements. Recommendations were made, including the introduction of controls to minimise deviation from standard procurement directives, and the development of continuous benefits assessments.

- **Faculties Health & Safety**

This audit exercise involved a high-level review of Health and Safety management at faculty level by focusing on the safety arrangements in laboratory spaces. The review set out to understand, at a high level, the arrangements for assessing and managing laboratory-related health and safety risks, the roles, responsibilities and governance relating to the management of those risks and to evaluate the adequacy and effectiveness of those arrangements in terms of risk management and the provision of value for money. The review identified a number of key Management actions required. These included the further the embedment of health and safety into King's organisational values and the enhancement of health and safety information and communications flows. The review also recommended that the Health & Safety Policy Statement, Strategy and Implementation Plan should be reviewed, along with the effectiveness of the HASMAP auditing process, and the necessary improvements should be implemented. One suggestion for improvement was to assess the feasibility of developing software to facilitate Health and Safety risk management, control and monitoring. Additionally, the review commented on the processes for ensuring the inspection, maintenance and repair of equipment was done compliantly and efficiently. Recommendations were made for ensuring responsibilities for this were clearly identified and recorded and for a streamlining review to take place to ensure efficiency is maximised.

- **Shared Recruitment of Programme Administrators**

This review set out to understand the rationale and objectives relating to the project to recruit a pool of programme administration staff across all faculties ("Shared Recruitment") and to identify the outcomes to date and the risks and challenges in the new approach. The review also evaluated the way in which the changes had been managed and assessed the adequacy and effectiveness of the new, shared, process. The review found that there was near-universal support amongst stakeholders for the concept of a coordinated, centralised process of recruitment, and the benefits it had delivered in terms of interaction and networking with counterparts across the university were recognised. Some issues were identified, such as a lack of data to support a clear evaluation of the effect of the change and a lack of training, and concerns around the amount of time it would take to build mutual trust between parts of the organisation which had been used to working in isolation and to their own agendas without having to consider the needs of other departments. Some issues were also identified around the amount and quality of training provided to recruiting managers and a recommendation was made to clarify who the executive-level sponsor of the project would be going forward, as the former sponsor had retired. The review also noted that some work was left to do in completing job designs to build standard institution-wide role profiles for programme administration staff

at each relevant grade. Appropriate recommendations were made, along with a suggestion to restate the original objectives of the change to stakeholders.

DATA QUALITY AND MANAGEMENT

In view of the growing importance of data systems and processes to support integrity, security and privacy, a number of specific data governance and quality reviews were undertaken in addition to the widescale review of data governance arrangements for the university, which was undertaken as a more strategic review. These targeted reviews included:

- **CoreHR pre-implementation of data governance measures**

This review was commissioned by the Director of Human Resources to provide assurance that measures taken to protect data and ensure the privacy of data subjects in the new HR system (CoreHR) were effective. The review was undertaken before the new system went fully into service, and so the audit testing was undertaken on a mixture of live and test data. The CoreHR database will contain detailed information about all workers at the university, irrespective of their contract type or terms of employment. Much of the information will be personal data, which is likely to be sensitive to the data subject in the common meaning of the word. Such information would include fields such as salary data, contact details or leave arrangements. A portion of the information is also likely to be sensitive data according to the specific definition of the Data Protection Act 2018 and the General Data Protection Regulation. This would include special category data relating to information collected for health screening or equal opportunities. In order to remain compliant with the Data Protection Act 2018 and the General Data Protection Regulation it is crucial that sensitive personal data is managed appropriately, and that the privacy of data subjects is maintained. The review found that the system was secure from a technical perspective and there was nothing of concern in the system for the first phase rollout. However, a small number of recommendations were made to improve the wider control environment. These included establishing formal data governance arrangements for the management of the system and its data, completing the actions identified as required in the Data Privacy Impact Assessment (DPIA) which had been carried out earlier in the project, and considering the addition of extra security measures for the system, such as multi-factor authentication for log-on.

- **OfS review of financial data submission for HESA returns**

This review, conducted by the OfS, was undertaken to seek assurances over the effectiveness of the systems and processes used to collate the 2016-17 HESA Finance record data relating to quality-related business research funding for 2018-19, and the accuracy of the data submitted to HESA relating to quality-related business research funding for 2018-19. The review found that income from a large number of clinical trials and a research group with a significant commercial interest should not have been treated as business income by the university in its data return. The errors resulted in the OfS notifying the university of an indicative reduction of £163k to quality-related business research funding. The reviewers made a number of recommendations which were aimed at improving the systems and processes used to collate HESA Finance record data relating to quality-related business research funding. The auditors later confirmed that they were satisfied with the university's Action Plan to address these issues and have formally closed the audit.

- **Data governance at the King's College London Mathematics School**

King's College London Maths School was opened in 2014 and the school is run under the sponsorship of King's College London. This review was conducted to provide assurance that data management practices at the School are compliant with the provisions of the General Data Protection Regulation (GDPR). Overall data protection management at the School was considered satisfactory and the auditors observed good practice in the processes established since the introduction of the new data protection regulations. A small number of recommendations were made in the review, mostly to follow up on existing good practice and ensure it continues. For instance, the auditors recommended that the school familiarised themselves with the compliance tools available, such as DPIAs, or resources available from King's College London and the regulator, such as guidance or lawful bases tools etc.

- **Update review of readiness for SITS Data Futures**

This report was a follow-up to a full review undertaken in the previous year, focussing on the university's readiness for the HESA Data Futures initiative. The report noted that there had been some significant delays to the external HESA Data Futures programme, with HESA deciding to revisit their initial design phase. This meant that the sector had no clarity on what the new ideation would look like. Engagement with staff across the institution had been good and it had been hoped that this would provide a solid basis for responding to the new HESA requirements. However, as a result of the uncertainty around both timescales and scope, the Data Futures Steering Group at King's had decided that the internal preparation led by the workstreams reliant on understanding the upcoming changes should be put on hold until there was more clarity from HESA on how the programme was proceeding. The auditors noted that the workstream leads were still holding meetings to discuss each workstream's action log and to ensure that the university was in a good place to recommence work once the future shape of the programme was determined.

- **Update review of the SITS student data improvement programme**

This follow-up review of the management of the SITS student database noted a number of positive developments. These included system access and permission work being completed for the SITS client and the establishment of a portfolio structure for Programme Administration Change & Transformation (PACT), with associated governance structures and processes having been put in place. There was still some work to be done on data quality and systems integration, as neither strand of the Business Process Redesign project had, at the time of the follow-up, been activated because work was continuing to determine which initiatives to prioritise.

SPECIAL INVESTIGATIONS

In addition to the above reviews, the Department of Business Assurance also conducted four preliminary investigations following allegations made in a public interest disclosure.

- Two investigations arose from allegations of bullying and harassment. Both cases were referred to other processes within the university for further action as a result of the preliminary investigation.
- One investigation was into an allegation of wrongful dismissal and misuse of employment legislation. The preliminary investigation found that an HR panel had already been

convened to hear the complaint of the former member of staff who had been dismissed, and therefore recommended no further action be taken for this third-party disclosure.

- One investigation followed an allegation of a breach of professional standards in teaching and misconduct. The preliminary investigation found that the event which was the subject of the disclosure had taken place at another institution and, despite the person accused of the breach of professional standards being employed at King's also, there were no grounds to refer this case for further actions.

OTHER AUDIT WORK UNDERTAKEN BY THIRD PARTIES

In addition to the work undertaken by the Internal Audit Department within the university, the auditing of European Union FP7, Horizon 2020 grants and certain "end of project" accounts remain sub-contracted to a third-party audit firm, CG Lees. During the year, CG Lees conducted 22 audits on projects to certify costs. The Director of Business Assurance and the Director of Research Assurance have met with their representatives and the Engagement Partner was able to confirm that, from the work they had undertaken during the year, they believe that the control environment in relation to the management of grants was generally sound and operating well, although they continue to support the internal audit recommendations for more work to be done on training of research teams around procurement protocols.

4. AUDIT OPINION

4.1 In accordance with the good practice framework developed by the HEFCE and OfS in past years, this report offers an opinion on the adequacy and effectiveness of the HEI's arrangements for:

- risk management, control and governance
- economy, efficiency and effectiveness (VFM)

4.2 Based on a combination of the audit work carried out during 2019-20 and earlier years, as well as the detailed knowledge acquired in relation to the management and governance arrangements operating within the university, the Director of Business Assurance would conclude that there is good evidence that internal controls are generally soundly based, are adequate and in the main operate effectively. A number of control weaknesses have been identified through audit work during the year and the Director of Business Assurance can confirm that management have demonstrated a willingness to engage and make improvements to ensure that the overall control environment remains effective or, where appropriate, have provided justifications for accepting risk. The Senior Vice President (Operations) and Provosts, in particular, have been engaged with this process during the course of the year and receive interim updates on the progress of all audit work. Remedial actions are monitored by the Internal Audit team and progress is reported to the ARCC. There is also evidence to support the conclusion that managers seek and achieve value for money in the management of their various functions and activities and that the university supports this endeavour adequately and effectively. The university has a dedicated procurement function which was set up to ensure that the best value is achieved from suppliers at all times and is actively engaged in a programme of outreach to strengthen this objective across the institution. A number of observations have been made during audit reviews which are intended to help strengthen controls. From a detailed knowledge and understanding of the governance arrangements operating within the university, as set out in the financial statements for the year ending 31 July

2020, the Director of Business Assurance concludes that the university has an adequate and effective system of corporate governance.

- 4.3 The Audit, Risk and Compliance Committee has been engaged directly with Management in regard to the improvement of systems to manage risk and, in particular, the processes by which risk is monitored, mitigated and reported throughout the institution. The senior leadership of the university has responded by making changes to processes to produce the improvement recommended by the Committee. The Executive is aware of the need to manage risk effectively and are currently content that the university is engaged in an appropriate improvement programme which will support the cultivation of an effective risk management culture within the organisation. The processes by which the university manages its key risks are likely to be adequate, but arrangements for monitoring and reporting risk are currently subject to some improvements. The Director of Business Assurance is confident that, given the engagement of management in this respect so far, the changes will produce an overall system of managing risk which is both adequate and effective.

5. INTERNAL AUDIT PLAN 2020-21

- 5.1 In order to remain flexible and responsive to change, and also to support Management during the business recovery period, the Internal Audit Plan for the 2020-21 year has been divided into discrete parts, which will be sequentially approved at each of the ARCC meetings during the year. This will allow the Business Assurance Department to respond to management need and support the recovery process, but also to provide assurance in the areas where the Committee considers the most significant risks reside.
- 5.2 The first section of the Internal Audit Plan for 2020-21 was approved at the June 2020 meeting of the ARCC. The second section will be presented to the November 2020 meeting for approval. At the time of writing this report, progress against the segmented plan was broadly on target.

Paul Mould
Director of Business Assurance
November 2020

Appendix A – Listing of Audit Reports for 2019-20

Appendix B – Follow-Up Activity on previous audit reports

Listing of Internal Audit Reviews for the year

#	Title of Review	Ref	ARCC Meeting
1	Departmental Review of FoLSM	18/19/3	November 2019
2	Pre-implementation audit of the HR system	18/19/13	November 2019
3	Review of HR processes to support compliance with the Equality Act 2010	18/19/17	November 2019
4	Departmental Review of the English Language Centre	18/19/18	November 2019
5	Review of Cyber Security (PA Consulting)	18/19/19	November 2019
6	IT Vendor Management	18/19/20	November 2019
7	University-wide Data Governance (PA Consulting)	18/19/21	November 2019
8	Study Abroad and Student Global Mobility	18/19/22	November 2019
9	King's Maths School – Data Governance	18/19/23	November 2019
10	Core HR System – Data Governance	18/19/24	November 2019
11	UKRI Funder Review Report – 3rd Party Report	18/19/25	November 2019
12	OfS Research Financials – 3rd Party Report	18/19/26	November 2019
13	Faculty Departmental review: Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care (FNFNMP)	19/20/01	November 2019
14	Research Strategy	19/20/02	February / March 2020
15	HR Case Management	19/20/03	February / March 2020
16	Faculty Health & Safety	19/20/04	February / March 2020
17	Residences end-to-end	19/20/05	February / March 2020
18	SITS: update to audit report 18/19/12	19/20/06	February / March 2020
19	Data Futures: update to briefing note 18/19/16	19/20/07	February / March 2020
20	Personal Tutoring Update	19/20/08	February / March 2020
21	Summer Programmes Departmental Review	19/20/09	February / March 2020
22	IT Governance (PA Consulting)	19/20/10	February / March 2020
23	Banking & Cashiering	19/20/11	June 2020
24	Programme Administrator Shared Recruitment	19/20/12	June 2020
25	Arts & Humanities Departmental Review	19/20/13	June 2020

Compliance Assurance Reviews

#	Title of Review	Ref	ARCC Meeting
1	KCLSU –Compliance with 1994 Education Act	18/19/CO6	November 2019
2	Reporting mechanisms for incidents involving human tissue	18/19/CO7	November 2019
3	Ongoing Compliance with OfS Registration Conditions	19/20/CO1	November 2019
4	Compliance with Fundraising Legislation and Regulation	19/20/CO2	February / March 2020
5	Estates Assurance – Fire Risk Assessments	19/20/CO3	June 2020
6	Compliance with DfE guidance on returning to campus	20/21/CO2	November 2020

Follow up summary

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
1	18/19/11	Investigation of missing cash at Science Gallery café	June 2019	N/A - Update paper only	Majority of actions implemented / superseded	<ul style="list-style-type: none"> • Bring the Café into formal management structures and/or reporting lines of King's Food • Improve cash handling processes and training for new members of staff • Reconcile both tills at end of each day • Record under / over amounts in both tills • Embed enhanced safe and cash handling procedures • Review Café staffing levels and/or working patterns 	Report followed up as part of Banking & Cashiers Report 19/20/11
2	18/19/12	Student data systems (SITS)	June 2019	Significant Improvement Required	On Track	<ul style="list-style-type: none"> • Implement SITS data access/edit controls • Agree strategy and/or objectives for student data and perform assurance monitoring • Document interdependencies / interfaces / integration between systems • Document and review current SITS automations and implement further automations • Implement oversight / co-ordination and communication of the multiple change projects 	See Follow-Up report 19/20/6
3	18/19/3	Departmental Review of FoLSM	November 2019	Improvement Required	Awaiting management response to follow up queries	<ul style="list-style-type: none"> • The business case process will be reviewed, timescales set, reasons for the decision made clear. • KPI's for research applications will be established and monitored. A clear strategy for research will be communicated. • Accuracy of accounts to be reported to faculty by second quarter 2019-20. Introduction of Department level accounts to be discussed. • The policy on non-pay carry forwards is currently under review. • Timesheets for consultancy work to be sent to Consultancy team quarterly & invoices raised. Consultancy in the management accounts currently under review by Finance. • Purchase card administration will be updated. More restrictions on new cards. Evidence will be requested for vouchers purchased. 	TBC

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
4	18/19/13	Pre-implementation audit of the HR system	November 2019	Significant Improvement Required	Management have accepted the risks identified in the audit as within risk toleration	<ul style="list-style-type: none"> • A new governance structure will be agreed and implemented. • A decision will be made and clearly communicated on who is the overall Project Sponsor. • A monthly update will be given on budget at every HRTT meeting by the Programme Director, to be minuted • Consideration to be given on ways to budget for future large projects. Staff charging structure to be agreed. Programme Director's salary to be charged to the project • The decision already taken to allocate an additional £1.6m will be documented and communicated • Budget increases or cuts to the HR Project will be evaluated by the relevant governance structure in place • The Payroll and Pension Manager will nominate a replacement to cover her role on the project, in case of absence • KPI's will be put in place to monitor service take up. Strategies will be undertaken to encourage adoption of the new services 	Management disagree with the suggested actions and decided to take no further actions and accept any potential risks arising from the issues highlighted.
5	18/19/14	Departmental Review of the Law Faculty	June 2019	Improvement Required	Majority of actions implemented / superseded	<ul style="list-style-type: none"> • Review expenses pre-approval, approval and sign off especially for those budgets where there is a lack of visibility • Enhanced oversight of controls surrounding purchasing cards • Continue to identify alternative resources / cost savings / funding to replace Dickson Poon Gift • Long standing issues with inadequate lighting in SHEW will be further escalated to resolution • Permanent members of staff will be recruited and embedded 	Regular contact with new Operations Director to obtain status of implementation of actions. Follow-up discussion with various members staff regarding expenses

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
6	18/19/15	Post Implementation Status of New Finance System (Paper)	June 2019	N/A - Update paper only	Majority of actions implemented / superseded	<ul style="list-style-type: none"> Continue to work with Business World to resolve any issues Move to Business As Usual, reducing time on project development Reduce / remove contractors as we move from Early Life Support into BAU Start Phase 2 of Implementation in October 2019 Train / upskill existing staff for the new environment Maintain communication and interaction with stakeholders Update Financial Regulations to reflect the new system controls and the external environment Shift focus within Finance to year end Recruit and support new staff for key roles Continue to take action to maintain positive staff wellbeing 	Regular meetings held with Chief Accountant to discuss implementation of actions from recent audit reports
7	18/19/16	HESA Data Futures (Paper)	June 2019	N/A - Update paper only		<ul style="list-style-type: none"> Continue to monitor HESA updates Maintain momentum on those workstreams that involve necessary improvements Ensure involvement in Purple (contracted third party) process reviews involving HESA-relevant data 	See Follow-Up report 19/20/7
8	18/19/17	Review of the university's compliance with the Equality Act 2010 (managing & recording of incidents)	November 2019	Significant Improvement Required	On Track	<ul style="list-style-type: none"> Discussion by HR leadership on bullying and harassment as a result of 2017 staff survey. The focus of the Qlearsite surveys will be extended to include bullying and harassment. An informal grievance form will be created. Investigation to establish if software can be introduced to record informal incidents anonymously. KPI's will be identified and reported Policies will be reviewed regularly Grievances will be categorised to enable statistics to be produced per protected characteristic and they will be analysed and reported. The Excel spreadsheet will be password protected A records management policy in respect of informal and formal grievances will be formulated. It will be discussed with the HR Leadership team and published. SMT will be informed 	Bullying and Harassment policy now approved and implemented, which will drive many of the recommendations. Other actions underway in the D&I and Case Management teams.

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
						<ul style="list-style-type: none"> Investigation to establish if software can be introduced to record informal incidents anonymously in order that statistics can be generated. A termly report will be presented to SMT and the Equality, Diversity and Inclusion Committee A working group will be put together to provide more co-ordination between staff and student record keeping. A standardised reporting format for both student and staff data will be discussed and decided, so that reporting can take place with anonymised data 	
9	18/19/18	Departmental Review of the English Language Centre (now King's Foundations)	November 2019	Improvement Required	On Track	<ul style="list-style-type: none"> Instigate other safeguarding processes until DBS is confirmed for new staff Review controls over access to and storage of personal and student data Clarify and communicate ELC strategy and positioning to wider King's community Enhance controls on expenses and purchasing cards Complete and embed leavers processes manner Provide additional support for staff dealing with vulnerable students 	Monthly meetings held with Head of Operations Manager until beginning of April when she contracted Coronavirus.
10	18/19/22	Study Abroad (now Global Mobility)	November 2019	Improvement Required	On Track	<ul style="list-style-type: none"> Clarify/update and communicate Global Mobility strategic and operational objectives upon publication of Internationalisation 2029 strategy Maintain engagement with key stakeholders/key review processes relating to incident management Establish/clarify team guidance around managing participant welfare/mental health concerns Formalise undocumented agent relationships and review partnership negotiation/sign-off processes Review and enhance key processes to reduce manual workload/reduce volume of data held outside enterprise systems Assess feasibility of streamlining portfolio of modules offered to incoming participants 	Regular meetings held with Assistant Director Global Mobility. Last meeting in April 2020

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
11	19/20/1	Faculty Departmental review: Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care (FNFNMPC)	November 2019	Improvement Required	On Track	<ul style="list-style-type: none"> Enhance controls surrounding purchasing cards and maintain monitoring and oversight Establish/strengthen management monitoring and oversight of voucher purchase/storage/distribution Embed faculty-based processes relating to leavers and joiners and retain required documentation Ensure expenses claims have sufficiently detailed descriptions and supporting documents/information Terminate obsolete/unnecessary SurveyMonkey accounts and move to alternative tools as necessary/appropriate 	Regular meetings held with Faculty Operating Officer. Last meeting in April 2021
12	19/20/2	Research Strategy	March 2020	Improvement Required	On Track	<ul style="list-style-type: none"> Develop a refreshed update of the research strategy action plan for the next three years. Investigation into overhead recovery statistics. Research facilities will have targets, pricing structures, quotes system and SLA's. Work with the faculties to define clear financial goals for research awards. There will be a clear outline of the end financial goal of the strategy in the refreshed action plan. Targets per faculty will be collated to show realistic aims. PowerBI reports will include income & be publicized. RMID/Analytics will use accurate FTE data when provided by HR. KPI's will be agreed & disseminated at local level. A plan will be put in place to introduce reporting at department level. The university will focus on creating a strategy for partnerships and industry. A paper will be delivered to SMT in February 2020. RMID to look at the correlations of the time allocation survey and the grant overheads and QR funding achieved. Analysis is necessary to discern whether value for money is achieved on activities carried out by academic staff and to inform strategic direction. Research incentivization process for staff considered. PDR's will include an objective to apply for x grants and an estimate of PI time. Development opportunities for Lecturers and Senior Lecturers considered. 	<p>Disruption has occurred due to COVID, but a new academic strategy has been developed for research, identifying key priorities for the next 2 years. New Costing and Awards module will improve the cost recovery situation. Working with Finance to understand the nature of the under-recovery. The current external environment for research funders makes it challenging to set strict targets. The work to improve accessibility and accuracy reporting in terms of is in hand.</p> <p>A new Director of e-Research has now been appointed. A Collective Delivery Plan for Vision 2029 has been prepared by the VPs and outlines key joint priorities across the different components of Vision 2029.</p>

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
13	19/20/4	Faculty Health & Safety	March 2020	Improvement Required	Awaiting additional Input from Management	<ul style="list-style-type: none"> • Embed health and safety into King's organisational values • Enhance health and safety information/communications flows • Review and update Health & Safety Policy statement, strategy and implementation plan • Review effectiveness of HASMAP auditing process and implement improvements as necessary/appropriate • Clarify/communicate institutional H&S information requirements (what/where/by whom) • Assess feasibility of procuring/developing software to facilitate H&S risk management, control and monitoring • Review safety resource, roles and responsibilities • Ensure that inspection/maintenance/repair responsibility is clearly identified and recorded for all lab equipment • Review, clarify and streamline arrangements for inspection/maintenance/ repair of lab equipment 	TBC
14	19/20/5	Residences end-to-end	March 2020	Improvement Required	On HOLD following Coronavirus	<ul style="list-style-type: none"> • Establish/formalise links and communication lines between planning processes and stakeholder groups to share planning information, decisions and evidence • Establish/formalise guiding principles for accommodation-related planning and risk management • Conclude planned Residences/Analytics work to produce accommodation forecasting system • Document key dependencies between RMS and other systems and set up regular data quality checks/reports to monitor/detect/correct issues • Implement/enhance change controls for systems and processes • Improve systems integrations and/or review and enhance data feeds between systems • Map/review information types/sources/ timescales and coordinate information/communication channels as far as practicable • Specify W2K early warning indicators, related sources of data/information and responsibilities/ activities in response to early warnings 	Previous Students & Education Director commissioned this review and then the COVID pandemic happened. Findings from review on hold for time being. Monthly meetings held with Business Manager until Furlough in May.

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
15	19/20/6	SITS: update to audit report 18/19/12	March 2020	Follow-Up report		<p>Progress since original review:</p> <ul style="list-style-type: none"> • System access and permissions work has been completed for SITS Client • Data quality and systems integrations are both strands of the Business Process Redesign project within Education and Students Transformation (PACT), but are not yet active approved projects as work continues to determine which initiatives to prioritise • Optimising SITS automation is dependent upon achieving significant change to SITS, through implementing consistent rule sets and common processes • A portfolio structure has been established for PACT, with associated governance structures and processes now in place 	Monthly meetings held with Business Manager until Furlough in May.
16	19/20/7	Data Futures: update to briefing note 18/19/16	March 2020	Follow-Up report		<p>Progress since original review:</p> <ul style="list-style-type: none"> • Data Futures on hold • Await further guidance from HESA • There have been considerable, enduring delays to the external HESA Data Futures programme • The King's Data Futures Steering Group have therefore decided that internal preparations that rely on understanding the upcoming changes should be put on hold for the time being • Many of the King's Data Futures workstreams incorporated changes that would reduce risk and workload relating to current HESA student data return requirements - stakeholders and leads of Data Futures workstreams are currently working to determine specific next steps for each workstream 	Monthly meetings held with Business Manager until Furlough in May.
17	19/20/8	Personal Tutoring Update	March 2020	N/A - Update paper only		<p>Next steps are for Management to agree</p> <ul style="list-style-type: none"> • next phase of Personal Tutoring journey / including resources • consider how best to enhance executive / academic sponsorship • establish KPIs / measurement mechanisms to gather and assess feedback from tutors and students 	Monthly meetings held with Business Manager until Furlough in May.

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
18	19/20/9	Summer Programmes Departmental Review	March 2020	Improvement Required	On Track	<ul style="list-style-type: none"> • Instigate other safeguarding processes until DBS is confirmed for new staff • Review controls over access to and storage of personal and student data • Clarify and communicate Summer Programmes strategy and positioning to wider King's community • Enhance controls to oversight expenses and purchase card transactions • Complete and embed leavers processes in a timely manner 	Monthly meetings held with Operations Manager until Furlough in May.
19	19/20/11	Banking & Cashiering - Going Cashless	June 2020	N/A - Update paper only		<ul style="list-style-type: none"> • Completion of phase 2 of the BusinessWorld implementation, including the Income Manager module used by Cashiers • BusinessWorld milestone 7 testing • Assessment, responses and monitoring around risks and issues relating to the COVID-19 outbreak 	Regular meetings held with Chief Accountant to discuss implementation of actions from recent audit reports
20	19/20/12	Programme Administration shared recruitment	June 2020	Improvement Required	Recruitment on hold and Programme disbanded	<ul style="list-style-type: none"> • Senior management to develop and implement institutional People Strategy and associated operational plan • Senior Vice President (Operations) to identify/clarify current sponsor(s) of shared recruitment implementation and define next steps for transition to business as usual and for handover to a HR process owner • Conduct job design/ redesign work to build standard institution-wide role profiles for programme administration staff at each relevant grade • Clarify/restate to stakeholders the original objectives of the change • Conclude and disseminate relevant data and analysis to objectively demonstrate outcomes • HR to assess training needs and design and deliver training to effectively meet identified needs • Shortlisting and deployment meetings to be chaired by independent staff member • Design and implement activities to enhance stakeholder group cohesion and stakeholder ownership of the process, particularly at managerial levels 	Subsequent to the conclusion of this review (end of April / beginning May), management decided to stop the Shared Recruitment process

#	Ref	Title	ARCC Meeting	Report Rating	Status of actions	Key Actions	Comments
21	19/20/13	Arts & Humanities Departmental Review	June 2020	Improvement Required	On Track	<ul style="list-style-type: none"> • A review by the Strategy, Planning and Analytics directorate is currently taking place. • Consideration to making more attainable initial offers. Review of targets. The need for a definitive set of attrition rates. Greater co-ordination with Admissions. • Monthly management accounts to be sent to HoD and training given. There will be a clear policy of the need for cross-subsidization. • A decision will be taken on whether the daily rate should be increased to a commercially viable level. Consideration to A&H offering the faculty a subsidized rate. • Continued discussion to establish a longer-term future of King's Digital Lab. • Account TS10228 to be reviewed in May 2020. Outstanding debt will be covered by departmental or faculty reserves. Academics should not be allowed to manage the relationships and money themselves as they may be conflicted. 	Issues raised in the review about the Purchasing cards are being reviewed between the faculty and Finance. TS Account has been reviewed SPA have been engaged to help with the more strategic issues identified in the review.

These pages have been redacted

Risks arising from the final withdrawal of the UK from the EU (minute)

The Director of International Strategy and Planning noted that things are moving quickly with regard to the final withdrawal of the United Kingdom from the European Union on 01 January 2021. There is an increased possibility of a deal, but the university's planning is still assuming that a deal will not be reached and working to understand how the implementation of any deal might impact on those plans. The university is still expecting there to be disruptions in customs, importation, trade etc. This will likely result in delays in the supply chain as well as additional work and bureaucracy. The major longer-term risks are around research relationships. The diversity of the student body is less of concern, as diversity will still be present irrespective of the UK leaving the EU.

Members expressed some concern that the descriptions of what may and may not happen following the end of the withdrawal period did not include the quantification of the financial consequences for the university, and asked if such modelling had been undertaken. The Director of International Strategy assured members that the university does have these assessments and that modelling has been undertaken. In terms of recruitment and student numbers, the modelling has assumed replacing EU students with other international students. This leaves a minimal impact at the macro level and the financial impact is nil, possibly even slightly positive. The potential adverse impacts which will need to be managed is at programme-level, and particularly for the programmes which have close ties to institutions in the EU. On the research side, the university will still be part of Horizon Europe, but the terms and conditions for that relationship are still not fully known, and so there may be some delay in funding from that source arriving with the university. The Principal noted that, in terms of student recruitment, there would be very little overall financial impact and the university can manage its way through the impacts reasonably well. There will be more of an impact in managing the internal distribution of students amongst programmes and this may lead to gradual rebalancing of the institution.

The Chief Finance Officer noted that, in terms of the supply chain, there may be some additional costs, particularly related to customs and duty. Some will be directly linked to tariffs and taxation, but there may also be some increased cost coming from the additional bureaucracy which will be required. Currently, the Procurement team is being engaged to obtain the appropriate guidance.

The Chair asked the Director of International Strategy if she was content that the right processes were in place to manage the risks which she had outlined in her report and those which had been surfaced during the discussion. The Director of International Strategy responded that she was very satisfied with the arrangements in place. She noted that the supply chain issues were particularly live at the moment, but the issues connected with staff and student welfare were very much under control, as there had been a very good process for communicating to affected stakeholders during the withdrawal period. The Director of International Strategy also noted that, no matter what happens with the finer details of Brexit at this point, there will still be disruption. However, the reinforced oversight of the cascade of management responsibilities through RERC provided confidence that appropriately mechanisms were in place to successfully deal with the chief risks.

The Chair thanked the Director of International Strategy for her presentation and for leading the discussion and noted that the Committee would follow the developments closely over the next few months.

Update on mitigating cyber-security risks (minute)

The Senior Vice President (Operations) reported on the progress of the programme of work to strengthen the cyber security posture of the university. He noted that there had been an elevated risk for some time and that had intensified through the pandemic period with staff and students working remotely. Other universities had suffered cyber-attacks which had led to the attackers taking down their systems and demanding a ransom. The SVP (Operations) continued that the university had made good progress in the past few years, but knew that it has further to go and that it has to carry the whole community with it, as strengthening the security posture will have an impact on the way in which staff and students access systems.

The Chief Information Officer provided some additional details about the work which had been undertaken. The university had completed its response to an earlier attempted attack and had completed a password reset for all users. He reported that there were a number of security “hardening” projects underway, but also noted that, to some extent, the university will never be finished with this work because of the nature of cyber-security. It was noted that whatever is done to tighten the security posture will impinge on the ability of individuals to operate. A steering board, including academics, had been established in order to establish the right levels of security and an overall direction and, crucially, to engage stakeholders throughout the institution on what was needed to provide a secure online environment.

Members congratulated the Chief Information Officer on the rate of progress so far, and in particular for the successful handling of particular attempted attacks. It was also noted by members that it was absolutely critical that this endeavour is properly funded going forward and, to that end, the budget numbers which have been presented so far may not be enough. It was also noted that the model for the way in which the university intends to manage Information Security going forward, which was described in the report to the Committee, was quite theoretical. It would be good, therefore, to see how recent real-time incidents would have been dealt with using the model. The Director of Business Assurance noted that this could be built into the specification of an upcoming audit of cyber-security arrangements by PA Consulting, and the outcomes reported to the ARCC at its March 2021 meeting. It was also noted that culture within the organisation is so important to ensuring a strong cyber-security environment, and that technology cannot fix behavioural challenges.

The Chief Information Officer agreed that digital skills development was a key issue for King’s. There had been some upskilling because of the pandemic and the lockdown, but the university had to maintain that rate of improvement amongst all its stakeholders. It was noted that training was important, but so was enforcement, and the latter had not received very much attention at King’s previously.

The Chair concluded by encouraging the Senior Vice President (Operations) and the Chief Information Officer to keep developing activity in this area and asked for the Committee to be updated on progress, including a full progress report in six months’ time.

Audit, Risk and Compliance Committee**Meeting date** 03 November 2020**Paper reference** ARCC1120C**Status** Final**Access** Members and senior executives**FOI release** After one year**FOI exemption** s.43, commercial interests

Terms of Reference of ARCC: 2020-21

Action required

- ☒ For approval or recommendation
☐ For discussion
☐ To note

Executive summary

Members of ARCC have an opportunity to review the Committee's terms of reference annually.

There are a small number of minor amendments to the Committee's terms of reference. The changes are marked-up in the document in order to direct members' attention.

The key additions are:

- a clause formalising the Council's delegation of oversight of the development of cyber security arrangements and related matters,
- a refinement to the description of the Committee's responsibilities relating to risk management; and
- inclusion of the Director of Strategy, Planning and Analytics in the 'in attendance' group of university officers, so as to keep the Committee informed about the development of the operation of risk management.

Other new members have also been added to the membership of the Committee. These additions are:

Staff members: Dr Susan Trenholm (King's Business School & Council member)

Dr Aleksander Ivetic (Faculty of Life Sciences and Medicine)

Student member: Mr Adrian Signell (Faculty of Life Sciences and Medicine)

Independent member: Interviews held on 26 October 2020. Result to be advised.

Biographies of the new staff and student members can be found in Appendix A.

Members are asked to recommend the amendments to the Terms of Reference for approval by the Governance and Nominations Committee and Council.

Audit, Risk and Compliance Committee

Terms of reference

Membership

- The Audit, Risk and Compliance Committee and its Chair shall be appointed by College Council and must consist of members with no executive responsibility for the management of the Institution, unless specifically authorised by the Office for Students (OfS). There shall be not fewer than four members, which may include co-opted members. A quorum shall be two members including the Chair. With the Chair's consent, virtual attendance by one or more members is permissible.
- Members of the Committee are appointed by the Council on the recommendation of the [Governance & Nominations Committee](#). The Chair of the Committee shall be an independent member of the College Council. At least one member should have a background in finance, accounting or auditing. The Council may add further members drawn from the staff or students of the College or independent members from outside the College with particular expertise. No member of the Committee may also be a member of the Finance Committee unless specifically authorised by the OfS.
- Members shall normally serve a maximum of two consecutive three-year terms, with the possibility of extension for a further single three-year term (up to a maximum of nine years) in exceptional circumstances.

In Attendance at Meetings:

- The Honorary Treasurer shall normally attend meetings of the Audit, Risk and Compliance Committee.
- The following College Officers shall normally attend meetings of the Audit, Risk and Compliance Committee:
 - The President and Principal
 - The Senior Vice President (Operations)
 - The College Secretary
 - The Vice President (Finance)/Chief Finance Officer
 - The Chief Accountant
 - [The Director of Strategy, Planning and Analytics](#)
 - The Director of Business Assurance
 - The Assistant Director of Business Assurance (Audit)
- A representative of the External Auditors will attend meetings where business relevant to them is to be discussed or at the invitation of the Chair. The Committee may meet with the external auditors, at any time, without any officers being present.
- The Director of Business Assurance shall act as Secretary to the Audit, Risk and Compliance Committee, on the delegated authority of the College Secretary.

Terms of reference

1. **Authority**

- 1.1 The Committee is authorised by College Council to investigate any activity within the Committee's terms of reference. It is authorised to seek any information it requires from any employee and all employees are directed to co-operate with any request made by the Committee. Similarly, the Committee is authorised to seek any information it requires from members of the student body.

- 1.2 The Committee is authorised by College Council to obtain outside legal or other independent professional advice and to secure the attendance of outsiders with relevant experience and expertise if it considers this necessary.

2. **Duties**

The duties of the Committee shall cover the following areas:

2.1 *Audit:*

- To review accounting policies and to review any major changes to the College's accounting principles and practices that are brought to the attention of the Committee by the external auditors, internal audit or management;
- To review the College's annual accounts and make recommendations to the Council regarding their approval;
- To seek assurance, through regular reports including performance indicators, that satisfactory arrangements are in place to promote economy, efficiency and effectiveness, and to advise College Council accordingly;
- To seek assurance on the effectiveness and adequacy of governance processes at the university;
- To consider reports concerned with allegations of fraud and to advise as necessary;
- To keep under review the College's Fraud Response Plan;
- To review the College's annual statement of internal control and to keep under review the effectiveness of internal control systems including, on behalf of College Council, responsibility for reviewing the effectiveness of the risk management process;

2.2 *Risk:*

- To receive reports on the College's risk assessment prepared by management, and to comment on the effectiveness of the actual or proposed responses to dealing with risks identified;
- [To receive regular reports from senior management on the control of risks to the achievement of the university's strategic plans so as to be able to assess the overall efficacy and adequacy of the approach to risk management;](#)
- [To keep in view, on behalf of the College Council, the university's arrangements for managing the risks related to cyber-crime together with information storage and security.](#)

2.3 *Compliance:*

- To consider, on an ongoing basis, the arrangements in place for the management of statutory and regulatory compliance in areas such as health, safety and environmental standards, equal opportunities, race relations, disability discrimination, Prevent, and other key legislative requirements, and to comment on their effectiveness.
- To regularly review the arrangements for compliance with the Policy for the Acceptance of Donations through reports from or on behalf of the Fundraising Ethical Review Group (FERG) and to report to the Council accordingly.

2.4 *Appointment and Performance of the External Auditors*

- To consider and recommend the appointment of the external auditors, and the relevant fee, and to annually review their performance;
- To consider and make appropriate recommendations concerning any question of resignation or dismissal of the external auditor;
- To discuss and agree the nature and scope of the audit with the external auditor before it commences and to discuss issues arising from the interim and final audits and any matters the auditor may wish to discuss (in the absence of College Officers where necessary);

- To review the external auditor's annual management letters and the responses by College management;
- To oversee the processes and practices in place to ensure the independence of the external auditors, including assessing reports of non-audit services provided by the external auditors to the College
- To review and pre-approve all non-audit services which may be performed by the College's external auditors over the value of £50k or a figure the Council may decide.

2.5 *Appointment and Performance of the Internal Auditors*

- To consider and advise on the appointment of the Director of Business Assurance in the context of that officer's responsibility for internal audit services;
- To review and approve the internal audit strategic and annual plans;
- To consider internal audit reports and management's response. To require, as necessary, the attendance of any College employee before the Committee when individual audit reports concerning the service or function relevant to that employee are being considered;
- To review and comment on the internal auditor's annual report;
- To review regularly the performance of the internal audit service.

2.6 *General*

- To receive any relevant reports from bodies such as the National Audit Office, OfS or UKRI and to consider the necessary College action;
- To meet by exception with the Vice President (Finance), the Director of Business Assurance and the external auditors in separate executive sessions, and with other College officers as required by circumstances and events;
- To produce an annual report for the OfS, College Council and the Principal;

2.7 *Performance of the Audit, Risk and Compliance Committee*

- To carry out a self-assessment evaluation of the Committee and its performance every three years and report the results to the College Council.

3 Frequency of Meetings

3.1 Meetings shall normally be held at least three times a year (once a term).

3.2 The external auditors, any member of the Committee or the Director of Business Assurance may request a meeting if they consider one is necessary.

4 Reporting Procedures

4.1 A report of each meeting of the Committee will be circulated to all members of College Council.

Composition		2019-20 Membership
Chair	<i>The Chair must be an independent member of the Council</i>	Mr Paul Cartwright
Members	<i>Other Independent members of Council</i> <i>Staff member of Council</i> <i>Independent co-opted Members</i> <i>Staff members – non-Council</i> <i>Student Member</i>	Ms Ros King Ms Lan Tu Dr Susan Trenholm Ms Julianne Daghish Ms Sarah Wilkinson Mr Waseem Malik (subject to confirmation by Council November 2020) Dr Aleksander Ivetic (subject to confirmation by Council November 2020) Mr Adrian Signell (subject to confirmation by Council November 2020)
Non-Members In Attendance	<i>The Honorary Treasurer</i> <i>The President and Principal</i> <i>Senior Vice President (Operations)</i> <i>Vice President (Finance)</i> <i>College Secretary</i> <i>Director of Business Assurance</i> <i>Assistant Director Business Assurance (Audit)</i> <i>Chief Accountant</i> <i>Director of Strategy, Planning & Analytics</i> <i>The External Auditor(s)</i>	Mr Michael D’Souza Professor Sir Edward Byrne AC Mr Stephen Large Ms Annie Kent Ms Irene Birrell Mr Paul Mould Ms Gillian Herridge Mr Simon Cruickshank Ms Bronwyn Parcell KPMG

Secretary: Mr Paul Mould, Director of Business Assurance (*Designate of the College Secretary*)

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Report of the Academic Board

Contents	Meeting at which considered	Consent agenda	Council action
1. Student Engagement and Satisfaction Annex 1	7 October 2020	No	Discuss
2. Portfolio Simplification Update Annex 2	7 October 2020	No	Discuss
3. Annual OfS Registration report Annex 3	7 October 2020	Yes	Approve
4. Degree Outcome Statement Annex 4	7 October 2020	Yes	Approve
5. HR Excellence in Research Report and Action Plan	7 October 2020	Yes	Approve
6. COVID-19 Update – Education Strategy	7 October 2020	Yes	Note
7. Academic Strategy - 2020-2021 assessment	7 October 2020	Yes	Note
8. Academic Strategy (Research) Update	7 October 2020	Yes	Note
9. Digital Education Policy	7 October 2020	Yes	Note
10. New MNurs Award	7 October 2020	Yes	Note
11. DCLinDent Proposal	7 October 2020	Yes	Note

For Discussion

1. Student Engagement and Satisfaction (Annex 1)

Board members received a report which summarised reflections on the latest NSS scores. The results had been discussed at workshops within each Faculty, within departments, and at various other meetings, and Board members were asked for input with a focus on priority areas to be taken forward immediately. The bulk of student dissatisfaction relates to the timeliness of feedback and the meeting's discussion mainly focused on this issue with the following key concerns noted:

- The need to focus on the usefulness and quality of feedback, not just timeliness
- Recognition that the optimal turnaround time for feedback would vary depending on whether the work was term work or examinations
- The impact shortening of turnaround times could have on early career staff who were often those responsible for marking
- Variable student experience with respect to personal tutoring

2. Portfolio Simplification Update (Annex 2)

The Board approved the remaining recommendations made by the Curriculum Commission on English and Film Studies modules at PGT level. The decision-making process for programmes and modules was completed in October 2020 and the final set of decisions was presented along with an overview of the project and details on implementation and timelines.

For Approval

3. Annual OfS Registration report (Annex 3)

Motion: **That the annual OfS report on King's conditions of registration, be approved.**

The Office for Students (OfS) monitors higher education providers to ensure that they continue to meet ongoing conditions of registration, including any new conditions introduced since the initial registration process. It also requires that Council receive assurance from Academic Board that academic governance is effective. The Committee of University Chairs (CUC) Code of Governance provides the following guidance:

'Governing bodies also need to provide assurance on academic standards and the integrity of academic qualifications and will work with the Senate/Academic Board (or equivalent, as specified in their governing instruments) to maintain standards and continuously improve quality. Governing bodies will also wish to receive assurance that specific academic risks (such as those involving partnerships and collaboration, recruitment and selection, data provision, quality assurance and research integrity) are being effectively managed'.

This report has been drafted to cover both of these reporting requirements and provides:

- confirmation of those conditions that have not changed since the initial registration process
- confirmation that any revised conditions introduced due to COVID-19 have been met
- confirmation that quality assurance continues to be effectively managed.

The draft report was considered by College Education Committee at its meeting on 30th September 2020 and approved for recommendation to Council at the Academic Board meeting on 7th October 2020.

4. Degree Outcome Statement (Annex 4)

Motion: **That the King's Degree Outcomes Statement be approved.**

All UK HE institutions are required to publish a Degree Outcomes Statement (DOS) before the end of December 2020. The DOS must outline the institutional degree classification profile and the outcomes of an institution review against the expectations of the Quality Code for Higher Education concerning the value of qualifications and, for providers in England, the Office for Students' ongoing conditions of registration on academic standards.

The proposed DOS has been endorsed by the Academic Standards Subcommittee (ASSC) (23 September 2020), the College Education Committee (CEC) (30 September) and Academic Board (7 October).

5. HR Excellence in Research Report and Action Plan ([Link](#))

Motion: **That the HR Excellence in Research (HR EIR) Report and Action Plan be approved**

On 29 July 2020 King's submitted the [report and action plan](#) to renew the HR Excellence in Research Award. By holding the award we retain external accreditation that we are implementing the terms of the Concordat to Support the Career Development of Researchers. This action plan is also the internal plan against the Concordat and Council is asked to approve the plan as required by UKRI before it can release funds to King's in future.

For Note

6. COVID-19 Update – Education Strategy

The Executive Director, Students and Education, provided an update on blended learning initiatives including: HyFlex classrooms now operational in 34 rooms and provision of 40 bookable spaces for staff and student meetings, along with additional spaces being made available for informal study.

It was noted that access to informal campus workspace was an inclusion issue, being particularly important to those students who did not have suitable study space at home. The next semester would be timetabled with a similar approach.

7. Academic Strategy – 2020-2021 assessment

A decision had been taken that all academic assessment for semester 2 would be online, excluding those with professional body requirements for in-person assessment. The Academic Standards Subcommittee (ASSC) was looking at lessons learned from last year and arrangements would be put in place to avoid problems such as collusion.

8. Academic Strategy (Research) Update

The Academic Strategy for research aimed to support King's research activity in the best possible way during the 18-24 month crisis caused by the COVID-19 outbreak, maintaining the research momentum and ensuring that King's research was in a good position to resume growth in 2021. Key priorities currently included how to deliver research on site, improving the grant pipeline and enhancing the infrastructure. The Academic Strategy for research was currently in consultation phase with a Town Hall meeting scheduled for 3 November 2020. The Vice President (Research) had also had one-to-ones with faculty leadership teams and had held large consultation workshops across the university. Academic Board would be invited to provide detailed input to the draft Strategy at its next meeting

9. Digital Education Policy

The Academic Board approved the Digital Education Policy subject to a clarification of wording around the recording of teaching materials. The Board noted that this policy would supersede the Lecture Capture Policy. While Lecture Capture had originally been provided as a revision tool for students who might miss a particular class, the new policy was focused on providing high quality teaching and learning in situations where there was no alternative for students to attend in person.

10. MNurs Proposal

Academic Board approved the addition of a new award, the Master of Nursing. The MNurs award is at FHEQ Level 7 and requires a minimum of 180 credits. It meets the QAA Masters Characteristics statements, falling into the category of a professional or practice Master's degree. Programmes using the award would be governed by the requirements of the UK Regulator for the Nursing profession, the Nursing and Midwifery Council (NMC). The MNurs is exempt from the requirement set out in Academic Regulation G.20 to include a research project as a core element, however, students will be taught to analyse nursing research and to apply evidence from it to improve outcomes for patients. The proposal had been endorsed by ASSC (6 July 2020) and by CEC (30 September).

11. DClinDent Proposal

Academic Board approved a new Doctor of Clinical Dentistry award, following endorsement at ASSC (23 September) and CEC (30 September). The new DClinDent degrees will ultimately replace the existing MSc programmes in Paediatric Dentistry and Special Care Dentistry. The DClinDent award is at FHEQ Level 8, requiring a minimum of 540 credits. This degree will meet the QAA Characteristics statement for Doctoral Degrees. The establishment of this degree will enable the development of the programmes to improve the student experience in both the academic and research aspects of training in the dental specialties and make the programme attractive to overseas sponsors wishing to develop academic leaders with a strong research background, in particular clinical research.

College Secretary
November 2020

Response to NSS 2020: Framework Approach

Updated, 15 November 2020

The NSS results for 2020 were disappointing for King's as an institution. Following the positive movement seen in the 2019 results, this year we saw a drop in overall satisfaction, and drops in satisfaction across each theme.

King's Education Strategy and Vision 2029 remain the right roadmaps for the transformation we need to achieve in all aspects of education and the student experience, and many of the major improvements we have been working to realise are beginning to bear real fruit. We also know that in responding to the NSS, students are commenting on the whole of their experience as students at King's, and some of the free text comments acknowledge the significant improvements that we have made in recent years. We have always been clear that our interest is in education and the student experience rather than being more narrowly with NSS metrics.

Nevertheless, the 2020 NSS results deliver to us a clear message – and one which is very difficult to hear – that the improvements we are making are not yet translating into increased student *satisfaction* overall, and that there remain too many stubborn issues on which our students feel that we are not making sufficiently rapid progress. While there are environmental factors to consider in interpreting NSS 2020 (industrial action, the pandemic), these were not unique to King's and our relative position has deteriorated as well as our absolute position. While we should congratulate the areas where we continued to receive very positive feedback, and the areas in which we saw pleasing improvement, we must therefore feel a keen sense of disappointment in these results.

In broad institutional terms, we propose that the qualitative and quantitative results reveal to us a range of overarching issues, which we must urgently address for the benefit of our students irrespective of the future development of the NSS itself:

1. The pace and scale of investment in the student experience is not yet sufficient to achieve the goals we have set for King's in relation to educational quality and the student experience. In particular, the pace and scope of improvements to our infrastructure, systems and processes remains too slow, as reflected in the worrying feedback that we continue to receive on organisation and management, especially when compared with other Russell Group institutions on this measure. A significant programme of breakthrough investment is needed to upgrade the 'machinery' of the university and improve all aspects of our infrastructure in the interests of the student and staff experience.
2. The feedback from students reveals some hard truths about the culture of the university. The vast majority of our colleagues work extremely hard and are completely committed to our students and their educational experience, and there is no doubt that we have seen significant positive

change in our prioritisation of education in recent years. Yet still, alongside the quantitative results, a wide variety of comments in the free-text section of NSS indicates to us that students still feel that the university and its staff do not consider them to be a priority, and that they do not feel sufficiently cared for and valued. Conversations about NSS and student experience issues continue to reveal that many staff in the university do not feel that their roles are connected to these issues, and even where their roles *are* relevant, we need to face up to continued facets of our culture and mindset (both in academic and in professional services spheres) that continue to make students feel under-valued.

3. There is a growing disparity in levels of satisfaction between different demographic groups of students, with a steep fall in levels of satisfaction expressed by our Black students compared with students of other ethnicities. Clearly we have not yet adapted fully to being a university in which more than 50% of our students are of BAME backgrounds, and there remain significant challenges in relation to diversity and inclusion generally, and inclusive education and services more specifically.
4. Many students do not believe that they and their views are adequately represented in the university, and many also feel that they are not well served by KCLSU. Students report communications with them to be fragmented and confusing.
5. Many of the stubborn issues identified in NSS are not connected to our major transformation projects, but to the basic 'hygiene' factors associated with students' day-to-day experiences which have been our focus for many years, but where break-through improvements are still not materialising.
6. The scale of continuing disparity between departments, and between and within faculties, cannot be considered acceptable. Some departments/faculties continue to receive consistently positive feedback from their students; for others the feedback has varied from year to year; others have received consistently poor feedback over multiple years, suggesting a lack of 'ownership' of the problem or a failure to bring about sufficient change to address it.

Considerations for our institutional response

- Broadly, responding to our NSS results at this stage is not so much about working harder – the vast majority of our staff are working extremely hard and stretching themselves continuously in their commitment to students – but rather about sharpening our focus. Rather than 'boiling the ocean', we propose that we need to develop a very clear set of institutional priorities, backed up by investment of resources, which in our collective judgment will make the most difference to our students.
- AY 20/21 is going to be much more pressured and challenging than any academic year in recent memory, and this process of prioritisation is therefore even more vitally important.
- Responsibility and accountability for student satisfaction extends across the whole of the institution and all of its constituent parts. Detailed faculty and department responses will be framed and supported by a clear institutional approach which identifies the overarching priorities in our response for the coming year. There remains too much finger-pointing and, in parts, a continued reluctance to 'own' the problem and to work collaboratively to address it.

- Each faculty and department plan will be framed by our institutional priorities, but will also need to identify locally-specific issues that have emerged from the NSS results. The identification of institutional priorities is not intended to undermine the variation that will be needed in the specifics of action plans across departments and faculties.
- The VP (Education) and the Executive Director of Education and Students have held formal ‘workshop’ style meetings with all faculties in September/October 2020 to review NSS results and faculty plans for improvement, identifying what kinds of institutional support is needed in each case. Follow-up meetings focussed on supporting progress will be held in December/Jan and April/May.
- Provosts and Executive Deans will be responsible for putting in place mechanisms to keep a *continuous* focus on improving the student experience, seeking appropriate assurance from Heads of Department, PS leaders and others.
- A handful of departments/faculties will be prioritised for additional institutional capacity to assist in understanding the roots of the challenge, identifying priorities for improvements and implementing actions. This is not to overlook investment of attention in those areas that are performing well.
- We will need to work even more closely with KCLSU, particularly on issues of representation, but also in coordinating consultation and engagement with students. All departments should also be increasing their engagement with their own students, and re-designing the ways they approach engagement in response to declining levels of satisfaction with ‘student voice’ – clearly, what we are currently doing is not working well enough.
- There are many examples of good practice, improvements gained and positive feedback, and we need to share the learning and insights from these.

The following table sets out the main areas of focus for our response and our ‘headline’ priorities. It takes as its starting point the four areas in which levels of satisfaction are most problematic: assessment and feedback; organisation and management; academic support; and the constellation of issues associated with a sense of community and voice. These are supplemented by the identification of priorities in relation to wider issues of how we work, and how we engage with our students.

It should be noted that this table does not include all the issues that need to be improved, and will not encompass all the issues that faculties and departments may need to include in their action plan given their local salience.

Issue area	Considerations	Priorities
Assessment and feedback	The bulk of student dissatisfaction relates to the timeliness of feedback. Sometimes this relates to late feedback, but more often it relates to how quickly we provide feedback, and the students’ consequent ability to use	Rapid policy change to shorten the standard turn-around time, with implementation sequenced over over 2020/21 and 21/22, and associated work on supporting systems improvements. Initial proposals have been

	<p>the feedback constructively to support their learning and approach to subsequent assessments.</p> <p>Students continue to highlight significant variation and patchiness in the quality of feedback.</p> <p>Over the last couple of years, we have experienced repeated 'crises' in the administration of assessment, particularly in relation to examinations. The January 2020 period was a particularly acute crisis, significantly affecting both staff and students.</p> <p>The move to online assessment in 2020/21 and its continuation in 2021/22 has the potential to deliver significant improvements in the organisation and management of assessment, as well as the quality of feedback, but will require concerted effort and focus to realise.</p>	<p>developed for consultation; <i>formal policy proposals now being worked up by NP, DW and Chair of ASSC.</i></p> <p>Rapid improvements in the sophistication of our approach to digital assessment, and realisation of consequent improvements in organisation and management of assessment, as well as quality of feedback. <i>ASSC leading a review of 20/21 experience, with recommendations made to CEC in September.</i></p> <p>Implementation of the recommendations from the SED review of the examinations processes in spring 2020, including the timeliness and accuracy of assessments, effective scheduling and early communications to students.</p> <p>Process review of the mark entry process to eliminate waste in the marking process and provide data to academic leads on turnaround time commitments.</p>
Organisation and management	<p>'Administration' underpins student responses in many themes where they are significantly less satisfied, especially assessment and feedback.</p>	<p>Rapid implementation of process review programme, focused on four selected target areas: <u>mark management; exams and assessment; timetable; and module selection and change processes.</u></p>

	<p>Partial, fragmented and inconsistent communications is a source of much student frustration; they do not feel sufficiently informed or valued when decisions, even relatively quotidian decisions, are made, and sources of advice are confusing and fragmented.</p> <p>The timetable does not work effectively for some categories of student. The production of the timetabling tends to be approached more as purely a space allocation issue than a student experience issue.</p> <p>King's is significantly below the rest of the Russell Group on student perceptions that courses run smoothly and are well organised. This speaks to issues of programme administration, systems and processes.</p>	<p>Student Enquiry Management programme to deepen and extend Student Services Online. Student Communications group to oversee all institutional comms, with SEM contributions</p> <p>Completion of current improvement projects: mitigating circumstances management, assessment of learning (portfolio management)</p> <p>Unification of all Registry services. Onboarding and training programme for all programme administrators.</p> <p>Personalised timetables for all students and improvement programme for Syllabus plus</p> <p>Two year prioritised programme for IT developments under the Education and Students Transformation programme (within current resource envelope).</p>
Academic support	<p>Scores for academic support place us bottom of the RG and feature some very low responses e.g. Q13 on 'advice on the course'.</p>	<p>Enhanced expectations on contact with students from personal tutors to be agreed, consistent with approaches agreed for 20/21 to support students in difficult circumstances.</p>

	<p>Academic support to be understood in our response as involving all aspects of academic and pastoral support for students' studies.</p> <p>Free-text comments continue to highlight availability of personal tutors and capacity of counselling and mental health services.</p>	<p>Appointment of nine Welfare and Well-being Officers based within faculties; rapid implementation of support system associated with these appointments. <i>Approval of funding secured and appointment processes now advancing.</i></p> <p>Continued implementation of portfolio simplification decisions, reducing unproductive complexity and allowing for more effective advice on study choices.</p>
Inclusive education; feeling of 'community'	<p>Wide-ranging issues are identified in the feedback on community; proposal is to focus on the issues of inclusive education that are most associated with diversity and inclusion</p> <p>The disparities between the satisfaction of our Black students and other demographic groups are alarming</p> <p>The priorities in the next column intersect with assessment and feedback, teaching quality, and many other areas.</p> <p>Students continue to express dissatisfaction with the responsiveness of mental health support services</p>	<p>CEC has approved the creation of a £100k grant scheme to support projects across the university in the areas of:</p> <ul style="list-style-type: none"> • addressing attainment gaps • reforming and diversifying assessment • decolonising the curriculum • advancing our approach to student engagement. <p><i>Grant scheme was launched in mid-November 2020.</i></p> <p>Acceleration of ongoing progress on diversifying assessment, integrated with planning for remote assessment in 20/21.</p>

		<p>Implementation of agreed steps on decolonising education, including expansion of Global Leadership Programme. <i>Paper from VPs International and Education considered by CEC 30/10/20 and for Academic Board in Dec 2020.</i></p> <p>Priority investment approved in SED to support anti-racism and inclusion in the delivery of education services, working with inclusive education partners. <i>Senior Project Manager: Tackling Structural Inequality and Embedding Anti-Racism(Education and Students) successfully appointed in mid-November 2020.</i></p> <p>Acceleration of investment in student mental health and wellbeing following a review and refresh of the 2018-2020 Student Mental Health and Wellbeing Report and Strategic Plan, in line with the Student Minds University Mental Health Charter</p> <p>As above, appointment of nine Welfare and Well-being Officers based within faculties; rapid implementation of support system associated with these appointments. <i>Approval of funding secured; awaiting permission to proceed with appointments.</i></p>
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<p>Student ‘voice’ and representation</p>	<p>Our approach to student engagement remains rather traditional, through ‘liaison committees’ rather than more fluid, rapid mechanisms</p> <p>Students report that they have good opportunities for feedback, but lack confidence in how their feedback is acted on and integrated into our planning.</p> <p>KCLSU has a priority of improving its system of representation; jointly sponsored review conducted in 2019/20.</p>	<p>Re-design of mechanisms for engagement, consultation and communication by <u>all</u> departments and faculties.</p> <p>Work with KCLSU to implement recommendation of the SUMS review of student representation. <i>KCLSU proposals discussed with NP and DW mid-November; now for engagement with faculties.</i></p>
<p>Sustaining the focus on student experience</p>	<p>Conversations with faculties indicate a continued lack of well-structured mechanisms for monitoring work to improve the student experience</p> <p>Our university culture clearly still needs to evolve to make sure that students and their experience are a focus across the board</p>	<p>Provosts to establish oversight mechanisms across their faculties, e.g. Student Experience Committee for A&S and Health faculties</p> <p>Deans to ensure at least monthly discussions with all HoDs of progress against agreed priorities and goals, and providing assurance to SMT that HoDs are providing appropriate leadership within their departments</p> <p>SMT and PSE to develop active proposals to make sure that all areas of the university articulate their responsibility and</p>

		<p>accountability for the student experience to all staff</p> <p>Rapid exploration of data improvements necessary to ensure that university leadership at all levels is able to monitor compliance with university policies and improvements in indicators relevant to student experience</p>
How we manage student surveys	<p>Analysis of better-performing institutions suggest that students' unions are much more involved in the promotion of NSS and other surveys aiming to capture student feedback</p> <p>Analysis of the 2020 NSS results suggests that students are using NSS to report their views on a very wide range of subjects, and from widely varying motivations.</p>	<p>KCLSU to play greater role for communication to students about NSS (if NSS survives) and other mechanisms of evaluation (e.g. module evaluation, whichever system replaces NSS)</p>
Other		<p>Proposals developed for 3-5 year programme of break-through investment in education and the student experience</p> <p><i>Draft investment case paper prepared; initial discussions underway pending first consideration by RERC in December 2020.</i></p>

NP/DW 15 November 2020



Portfolio Simplification – November 2020

Final report on recommendations approved at Academic Board and plans for implementation

With all decisions now agreed at Academic Board, this provides a breakdown of the final recommendations across the Faculties and gives details on plans for implementation and progress.

Contents

1. Overview of Portfolio Simplification
2. Final Decisions as approved by Academic Board
3. Implementation and timelines

[Appendix 1: Details of process](#)

[Appendix 2: Programmes delivered with a partner provider](#)

[Appendix 3: Final Decisions as approved by Academic Board – Faculty breakdown](#)

1. Overview of Portfolio Simplification

Portfolio Simplification was a large-scale, comprehensive and significant review of the curriculum across the university.

Portfolio Simplification provided an opportunity to ensure that our provision is fully aligned to our academic strengths and future academic priorities, meets the needs of current and prospective students and staff, and is sustainable in terms of workloads, administration and cost. The aim was to reduce the overall size and complexity of our current portfolio of programmes and modules, while maintaining the strength and vibrancy of our academic environment for both staff and students.

Kings offered large numbers of programmes and modules: many modules are chosen by small numbers of students and some are duplicated by different faculties. In 2017-18, for example, we offered almost 3,300 modules: around 20 per cent of these ran with enrolments of fewer than 10 students (31 per cent at PGT level). In the same year we offered 539 programmes (190 UG and 349 PGT). Of these, 56 per cent recruited fewer than 10 FTE students and 40 per cent recruited fewer than 5 FTE.

We therefore looked strategically at the programmes and modules we offered, to create the foundations for a flexible and truly transformative curriculum, based on sound pedagogy and responsive to student demand. Portfolio simplification also aimed to create the space and time in the curriculum to introduce innovation in our future curriculum – ‘Curriculum 2029’. This curriculum, along with other elements of our Education Strategy, will transform how education is delivered at our university over the next few years.

The Curriculum Commission, chaired by Professor Nicola Phillips - Vice President & Vice Principal (Education) - was established to oversee the process in late 2018, which included the Executive Deans, senior academic representation from across the university, and student union representation.

The Curriculum Commission agreed student number thresholds (by full-time equivalent (FTE) on undergraduate and postgraduate programmes, and headcount on undergraduate and postgraduate modules) to define the scope of the review. 476 programmes of our total of 623 fell within the scope of the review, alongside 2142 modules of our total of 3310. The thresholds provided a starting point for discussion within faculties about the size and shape of their future curriculum.

One of the key principles of the Portfolio Simplification process was that it would be academically led within faculties and departments, working within the parameters set by the Curriculum Commission (itself an academically led body) but making sure that our academic community was fully engaged in the process. From February 2019 to September 2020, all departments and Faculties reviewed their programmes and modules, before making recommendations to the Curriculum Commission with information about what they proposed in each of these categories: to *retain* them in their current form; *reconfigure* them; or *discontinue* them. The portfolio simplification process was managed extremely well in faculties, with staff and student engagement throughout the process. The efforts of the Executive Deans, Vice Deans Education and their teams across the faculties, as well as the Project Team, have been commended warmly.

Faculties’ recommendations were then considered carefully first by working groups (sub-groups of the Curriculum Commission), and then the Commission as a whole. Final decision-making authority rested with Academic Board, which received the final recommendations of the Curriculum Commission for consideration at its regular meetings. Outline information was presented to Academic Board at each stage of the process, with the full minutes of Curriculum Commission meetings (including the working group meetings) available on the intranet, so that members of Academic Board could satisfy themselves fully that due process had been followed, and seek further information on the deliberations of the Curriculum Commission for each programme and module.

To achieve the broadest engagement throughout the process, Portfolio Simplification commenced with a university-wide launch conference in February 2018, where all staff in positions of academic leadership and students were invited. A Faculty Liaison Committee was established to support faculties throughout the review process, which met regularly from February 2019 onwards. There was regular communication throughout the process, with initially weekly and then monthly e-Briefings and Intranet Updates which ensured consistent messaging and information. The context, thresholds, categories and guiding principles of Portfolio Simplification were published online on internal King's webpages, ensuring full transparency throughout the process (see [Appendix 1: Details of process](#)).

Three categories of programmes were reviewed separately as integrated pieces of work: Study Abroad programmes; Intercollegiate programmes (University of London); and Intercalated degrees. Cross-faculty panels were convened to take a strategic view and recommend a college wide approach on each of these three areas of provision, aligned to the aims of portfolio simplification. Programmes and modules that were identified as being tied to contracts or partnerships were considered early in the process, recognising the importance of our partnerships (details can be found in [Appendix 2: Programmes delivered with a partner provider](#)).

Portfolio Simplification has been a major institutional undertaking which required the time, attention and leadership of colleagues right across the institution, as well as the participation of students. The decision-making process for programmes and modules was completed in October 2020 and all decisions will have been fully implemented within three years and fully comply with CMA regulations.

Once completed, we will have laid firm and sustainable foundations for improving the quality and sustainability of education at King's and realising the academic ambitions of Curriculum 2029.

2. Final Decisions as approved by Academic Board

476 programmes of our total of 623 fell within the scope of the review, alongside 2,142 modules of our total of 3,310. A graphical summary of the decisions can be found in [Appendix 3: Final Decisions as approved by Academic Board – Faculty breakdown](#).

Programmes

As a result of the Portfolio Simplification process 286 programmes are being discontinued, 127 retained and 63 reconfigured.

Table 1. Recommendations for Programmes approved at Academic Board

	A&H	FoDOCS	FoLSM	NMS	FNFNM	SSPP	IoPPN	KBS	Law	Total
Discontinue	77	3	61	20	26	78	18	2	1	286
Reconfigure	11	9	12	11	5	8	4	1	2	63
Retain	22	12	25	16	5	38	5	-	4	127
Total	110	24	98	47	36	124	27	3	7	476

Table 2. Timeline for implementation for Discontinuation of Programmes

Total number of Programmes scheduled to be closed	Number of Programmes closing per academic year
286	2020/21 > 161
	2021/22 > 48
	2022/23 > 31
	2023+ > 9
	TBC > 37

Table 3. Timeline for implementation for Reconfiguration of Programmes

Total number of Programmes scheduled to be Reconfigured	Number of Programmes per academic year
63	2020/21 > 15
	2021/22 > 19
	2022/23 > 13
	2023+ > 8
	TBC > 8

Modules

As a result of the Portfolio Simplification process, 1065 modules are being discontinued, 588 retained and 489 reconfigured.

Table 4. Recommendations for Modules approved at Academic Board

	A&H	FoDOCS	FoLSM	NMS	FNFM	SSPP	IOPPN	KBS	Law	Total
Discontinue	566	6	136	59	52	164	49	3	30	1065
Reconfigure	384	12	19	6	6	19	8	2	33	489
Retain	149	55	102	45	17	158	17	5	40	588
Total	1099	73	257	110	75	339	74	10	103	2142

Table 5. Timeline for implementation for Discontinuation of Modules

Total number of Modules scheduled to be closed	Number of Modules closing per academic year
1065	2020/21 > 316
	2021/22 > 297
	2022/23 > 88
	2023+ > 237
	TBC > 127

Table 6. Timeline for implementation for Reconfiguration of Modules

Total number of Modules scheduled to be Reconfigured	Number of Modules per academic year
489	2020/21 > 43
	2021/22 > 101
	2022/23 > 62
	2023+ > 133
	TBC > 150

Implementation and timelines

Faculties made recommendations on when closures would take effect up until academic year 2022/23. To date, processing the decisions of Portfolio Simplification (in particular the discontinuation decisions) has been managed by the project team, but it will now transition to business as usual under the Quality, Standards and Enhancement team. Implementation of all decisions will be overseen by the Programme Development and Approval Sub-Committee (PDASC). Faculties will report twice-yearly to PDASC, outlining the progress of their implementation against the decisions agreed in the Portfolio Simplification process. In turn, PDASC will provide regular updates to the reconfigured Curriculum Commission, who maintain broader oversight of implementation.

All programme changes will be timed so that there is no adverse effect on existing students, who will all have the chance to complete the programme on which they are enrolled. Changes to module offerings on programmes will be handled in the usual way and will remain consistent with CMA guidelines.

Programmes

Discontinuation

The process for the discontinuation of programmes was approved at the November 2019 CEC ([paper: CEC: 19/20: 25. 'CEC PS to C2029'](#)) along with the revised process and governance for 'reconfigure' decisions. PDASC is responsible for ensuring that the approved **discontinued** programmes are formally closed within the agreed timeline to ensure the College meets its CMA compliance obligations, including ensuring that appropriate support is in place for students remaining on programmes that are to be discontinued.

This process was developed using as much information as possible from faculty submissions to the Curriculum Commission and aims to minimise any administrative burden on faculties. The process is as follows:

- 1) Academic Board approves Curriculum Commission recommendations.
- 2) Faculties, Admissions, Policy and Compliance, Registry Services, QSE and Marketing collaborate together to review discontinue implementation dates, and course codes are set against each programme 'instance' (i.e.: full-time and part-time versions of the same programme). Relevant professional services teams process updates to systems as appropriate.
- 3) QSE give Admissions/Registry/Marketing report to CEC, to confirm that all discontinued programmes have followed the above outlined process by the time scales agreed by Academic Board.
- 4) Regular reports are provided to the Curriculum Commission via PDASC.

Throughout 2020 we have been working with the central directorates and Faculty colleagues, through a series of sessions, to carry out the discontinue process for Portfolio Simplification to the timelines agreed.

In summary we have processed the following number of course codes on SITS with the central teams:

Confirmed closed (MCR)	Awaiting confirmation to close / be closed	Total
54	188	242 ¹

¹ There are larger numbers of course codes than programme codes (due to part-time versions and other variations)

Reconfigure

The approval processes for reconfigured provision mirrors our existing division of responsibilities between faculty-level approval processes and PDASC. There is no change to the documentation or process used by PDASC and faculties have begun submitting 'reconfigure' proposals to PDASC.

Modules

As per the current process, module management is primarily the remit of the faculty. Therefore, where possible, implementation of the Portfolio Simplification module decisions are to be managed and carried out by Faculty. The guidance for Faculties for modifications (reconfigure) of modules has been outlined and approved at the November CEC ([paper](#), as above).

Similarly, discontinuation (withdrawal) of modules should be carried out by Faculty as per the usual process through OPAMA where possible. Updates on module withdrawals will be provided by faculties at PDASC. The Portfolio Simplification project team is working with colleagues from SED to review the process of discontinuing modules, with a view to supporting faculties, and identifying and resolving issues.

Appendix 1: Details of process

Recommendations

Faculties were asked to provide a recommendation for each of their programmes or modules in-scope:

Retain	Reconfigure	Discontinue
<ul style="list-style-type: none">• Programme or Module Number• Programme or Module Name• Answers to the Retain Question Set	<ul style="list-style-type: none">• Programme or Module Number• Programme or Module Name• Answers to the Reconfigure Question Set	<ul style="list-style-type: none">• Programme or Module Number• Programme or Module Name• Confirmation anyone likely to be impacted has been consulted.

1. Rationale

Faculties were asked to provide a one-page rationale providing:

- an overview of the faculty's portfolio;
- an explanation of the specific challenges that the current curriculum poses to the faculty;
- an overview of how the faculty has sought to address these challenges through Portfolio Simplification, to develop its curriculum in line with the principles of Curriculum 2029.

2. Answers to relevant question set

For each programme / module (or grouping of programmes / modules with similar characteristics) that faculties propose to retain or to reconfigure, the following questions were answered:

'Retain' Question Set (*upper limit of two pages*)

1. What is the academic and pedagogical value of this programme/module within the curriculum?
2. How does the programme/module align with the principles of Curriculum 2029?
3. What efforts have been undertaken to make the programme/module efficient and sustainable, and have these efforts been successful?
4. What is the future demand anticipated to be for this programme/module?
5. In the case of a programme, how financially sustainable is it?

'Reconfigure' Question Set (*upper limit of two pages*)

1. Statement of rationale & brief outline intention
2. How might this reconfiguration affect programme/module appeal?
3. Brief outline of how this reconfiguration is consistent with the principles of Portfolio Simplification?
4. If reconfiguration is a merger, what programme(s)/module(s) is it being merged with?

Guiding Principles

The Curriculum Commission worked on a set of guiding principles, setting out the spirit of the exercise, to guide decision-making, at faculty-level and by the Commission itself. These principles were:

- Collegiality

We are all working together towards the same objective: to lay the foundations, through Portfolio Simplification, for a truly transformative future curriculum for our students. This positive intent and

collegiate spirit should be the basis of our decision-making, from faculty-level decisions to the Curriculum Commission.

- **Faculty Owned**

Faculties are responsible for engaging their staff and students appropriately in decision-making to discontinue/reconfigure/retain modules and programmes. Executive Deans have overall ownership of this process and should sign-off the submissions presented to the Curriculum Commission.

- **Assume Support**

The Curriculum Commission fully expects to support faculties' decisions where reasonable challenge and simplification is evident in a faculty's approach to the exercise.

- **Ask for Help**

The Project Team can provide help and support as needed and the Faculty Liaison Committee has been established as a supportive and non-judgemental forum for faculties to share emerging good practice and to discuss any challenges.

Faculty Liaison Committee

The Portfolio Simplification Project Team sought feedback on how Portfolio Simplification was proceeding via a dedicated Faculty Liaison Committee (Vice Deans Education and Faculty Education Managers, with each faculty represented). This was established as a mechanism for faculties to share challenges and best practice, and to seek support from the Project Team as needed.

The university's Senior Management Team, Academic Board and Council received updates throughout the Portfolio Simplification exercise.

Intranet Page

A Portfolio Simplification intranet page was available for use and included an explanation of the review, helpful resources, FAQs (see below) and contact details for the project team.

Portfolio Simplification Conference

Portfolio Simplification was officially launched at a half day conference on Monday 18 February, 2019. This event was developed to provide:

- an introduction to the process and what it is we are trying to achieve
- an overview of the data landscape
- case studies from King's faculty members who are currently working or who have previously implemented local curriculum reviews in the past
- a World Café exercise to allow participants to think through how Portfolio Simplification could be delivered at the faculty level including consideration of opportunities and challenges presented by the review.

Conference sessions were recorded and were uploaded to the Portfolio Simplification intranet page. Feedback indicated participants appreciated the information that was provided and enjoyed speaking with colleagues about plans for delivering this initiative at faculty level.

Curriculum Overview Dashboard

A Curriculum Overview dashboard in Power BI Pro was created and shared with all 370 individuals on the Portfolio Simplification distribution list, meaning they had access to an authoritative list of all

programmes and modules that were in-scope of the thresholds established by the Curriculum Commission.

A series of Power BI Pro Breakfast Briefings took place in early March 2019, with the goal of acquainting users with the way the software works and to demonstrate how information relevant to Portfolio Simplification could be obtained.

Communications and Engagement Plan

A Communications & Engagement plan was created, with input from the Curriculum Commission. It included a set of key messages which were used as a basis for communication with staff and students about Portfolio Simplification. This helped to ensure that communication about Portfolio Simplification was consistent and that the rationale for the review – what it is, and what it is not – was made clear. The Project Team coordinated opportunities to engage colleagues across faculties, by establishing a Faculty Liaison Committee. These opportunities were complemented by local engagement within each faculty.

Weekly Briefings

Weekly email briefings were sent to the wider distribution list to highlight important steps in the Portfolio Simplification process, this was reduced to bi-weekly and then monthly.

Frequently Asked Questions

We compiled a set of frequently asked questions to help staff and students, with the topics listed below:
Rationale - why is King's reviewing its curriculum now?

Process

- What were faculties asked to do?
- Which programmes and modules were reviewed?
- Why were the thresholds set at this level?
- How were decisions made?
- How did the Portfolio Simplification process work?
- How were submissions reviewed?
- Will new programmes and modules be approved while Portfolio Simplification is in progress?

In Conversation: The Future of Education at King's

The Principal and Professor Nicola Phillips (Vice President & Vice Principal (Education)) discussed Portfolio Simplification in the context of the Education Strategy and the future of education in a video posted on the intranet page. [Watch video](#)

Appendix 2: Programmes delivered with a partner provider

Programmes and modules that were identified as being tied to contracts or partnerships were considered early in the process, recognising the importance of our partnerships. There were a number of identified programmes delivered with a partner provider that are being discontinued, these include; MA Digital Curation - Joint Award (2018); MA European History - Joint Award (2016); MA Global History - Joint Award (2016); LLB English Law And Hong Kong Law, (2016). The providers are as follows: Digital Curation is with Humboldt Universität zu Berlin; MA European History with European consortium UNICA network; MA Global History was with Georgetown University; LLB English Law and Hong Kong Law is with the University of Hong Kong. In all cases, the agreements to discontinue had already been made and teaching out rules were applied prior to the Portfolio Simplification process.

The Faculty of Dentistry, Oral & Craniofacial Sciences have agreed with their partner in Malta to discontinue the Joint Award for their MSc in Orthodontics programme. The programme currently has three students still enrolled on it, two of which are in their final year and due to graduate this year. The remaining student is in their first year of a three-year programme and is expected to progress to their second year in September 2020. Both Malta and King's have agreed to teach out the student in accordance with the termination clause set out in the Memorandum of Agreement that underpins this programme. The recruitment cycle was every three years and both parties have agreed not to offer or recruit to the programme any further.

Appendix 3: Final Decisions as approved by Academic Board – Faculty breakdown

Portfolio Simplification

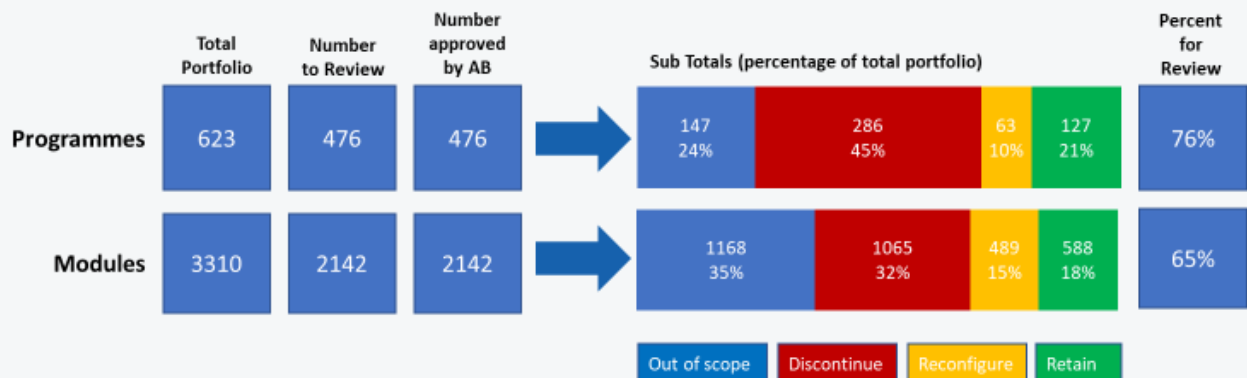
All Faculties: scope and review of progress to date

	Total Portfolio	Number to review	Number approved by AB	Percent Approved
Programmes	623	476	476	100%
Modules	3310	2142	2142	100%

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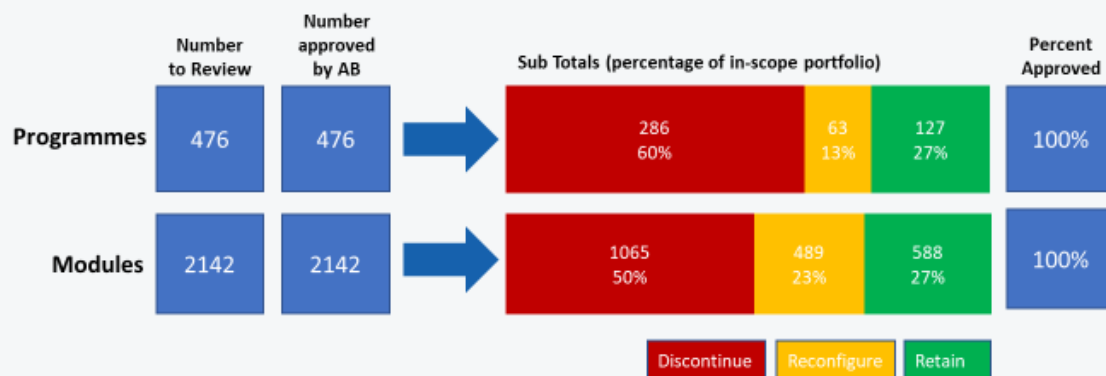
Academic Board Approvals (October 2020): All Faculties

Full portfolio



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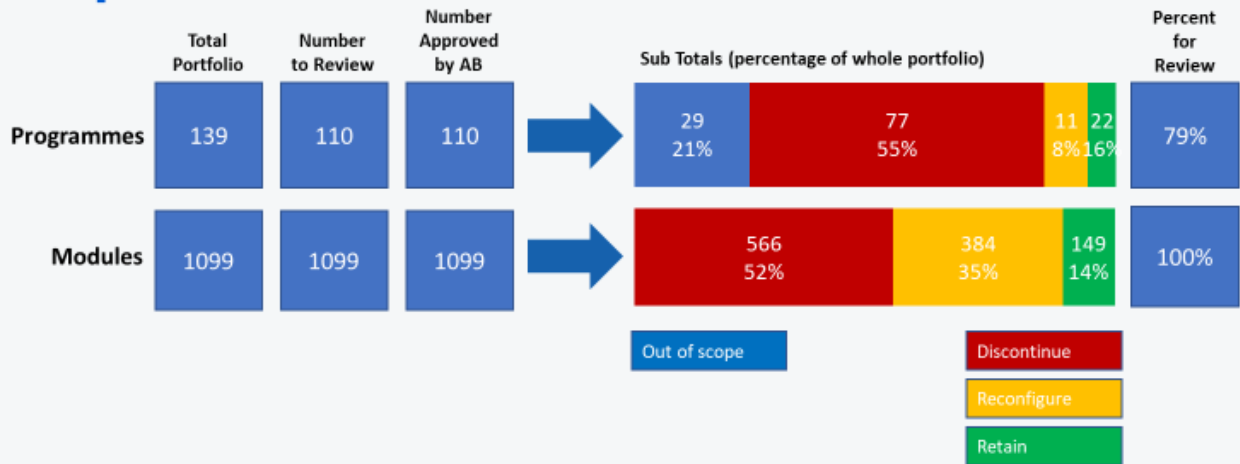
In-scope portfolio



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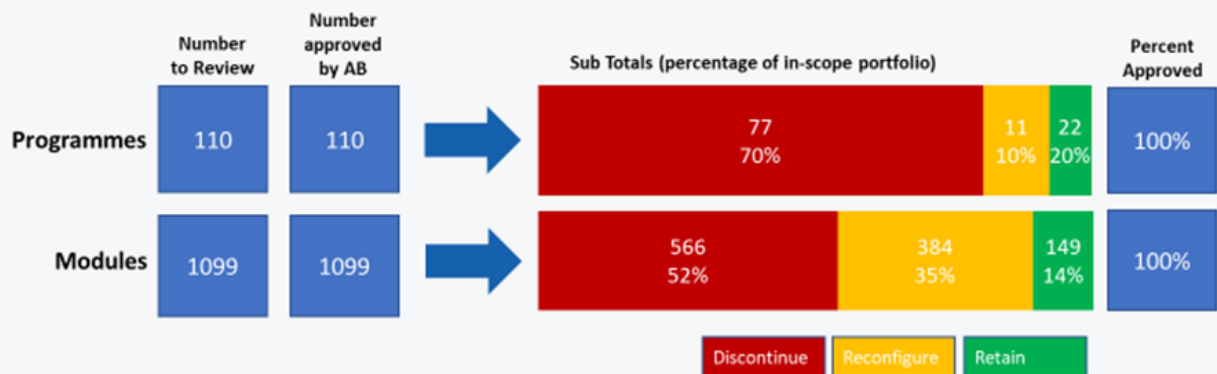
Arts & Humanities

Full portfolio



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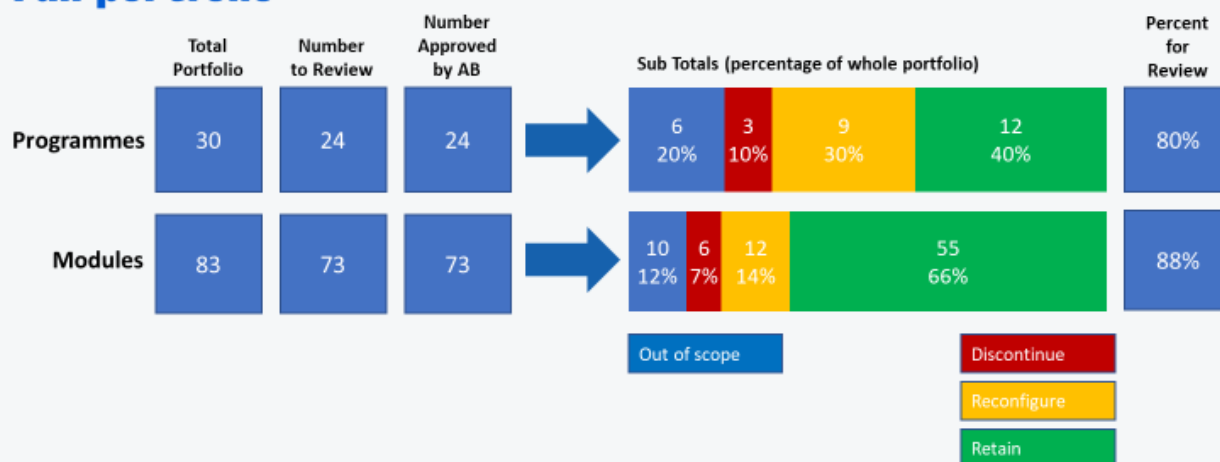
In-scope portfolio A&H



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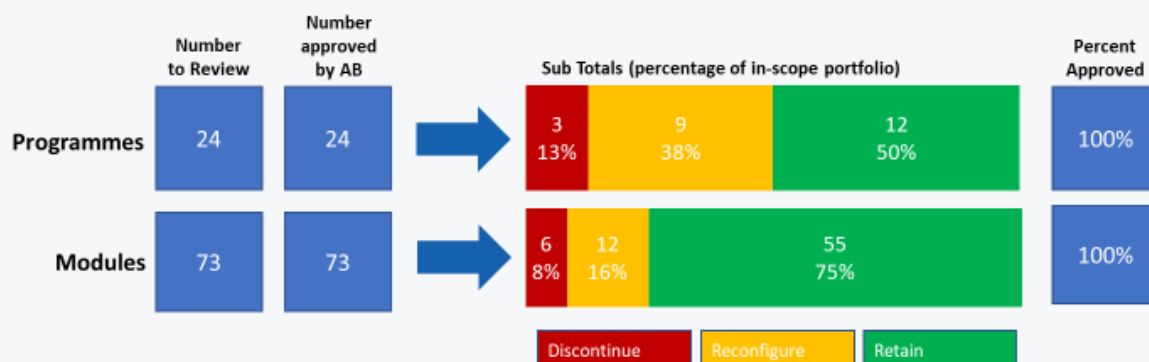
Faculty of Dentistry, Oral & Craniofacial Sciences

Full portfolio



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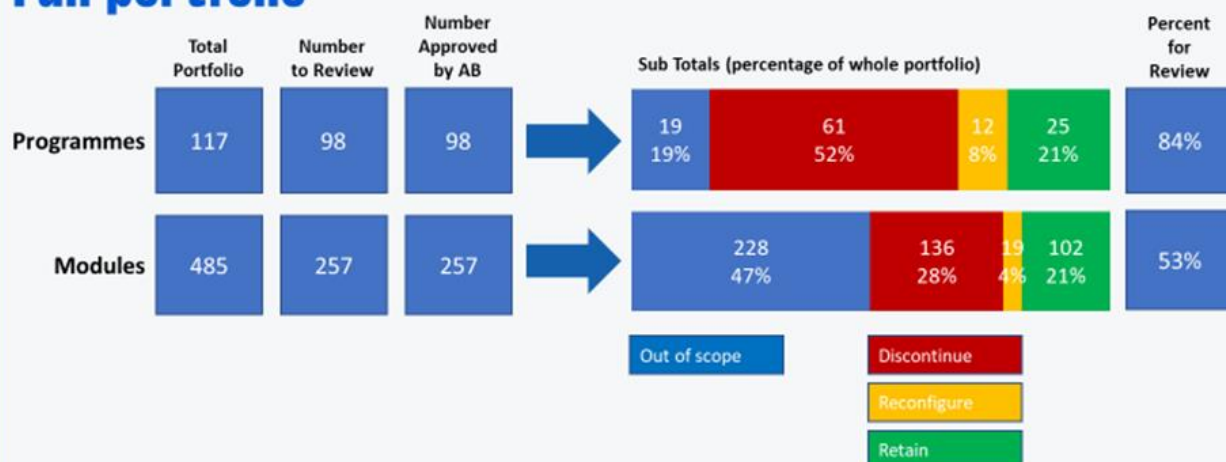
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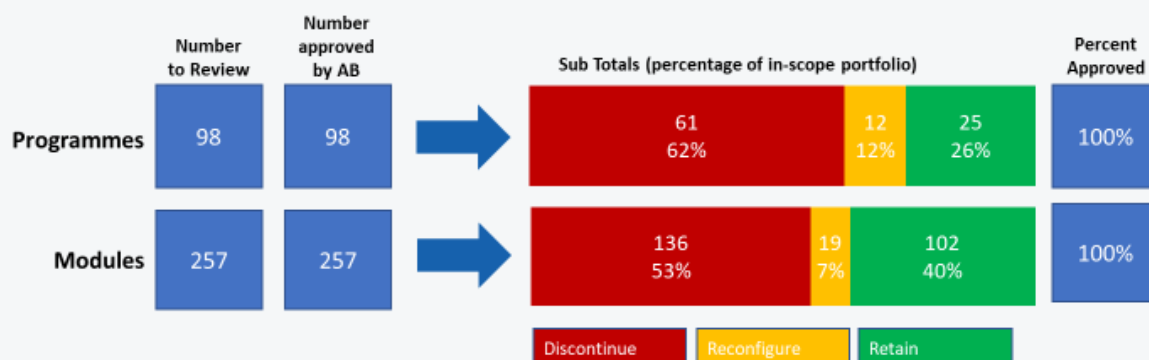
Faculty of Life Sciences & Medicine

Full portfolio



EDUCATE TO INSPIRE AND IMPROVE

In-scope portfolio



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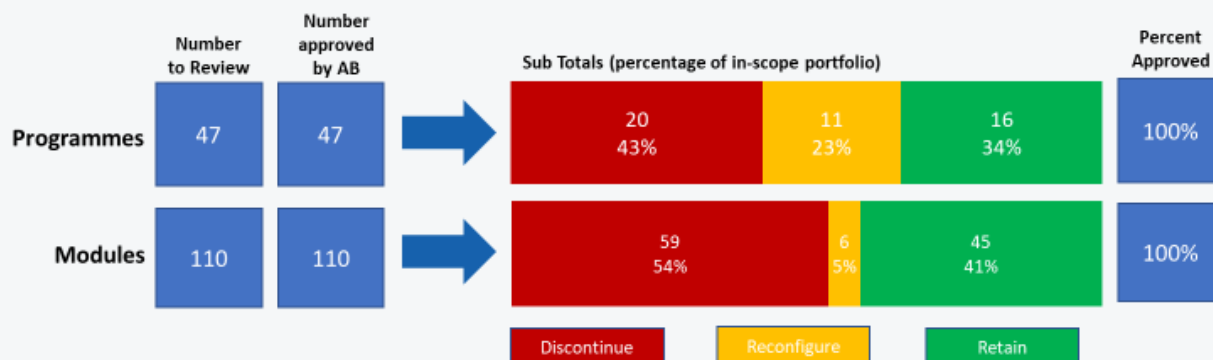
Faculty of Natural & Mathematical Sciences

Full portfolio



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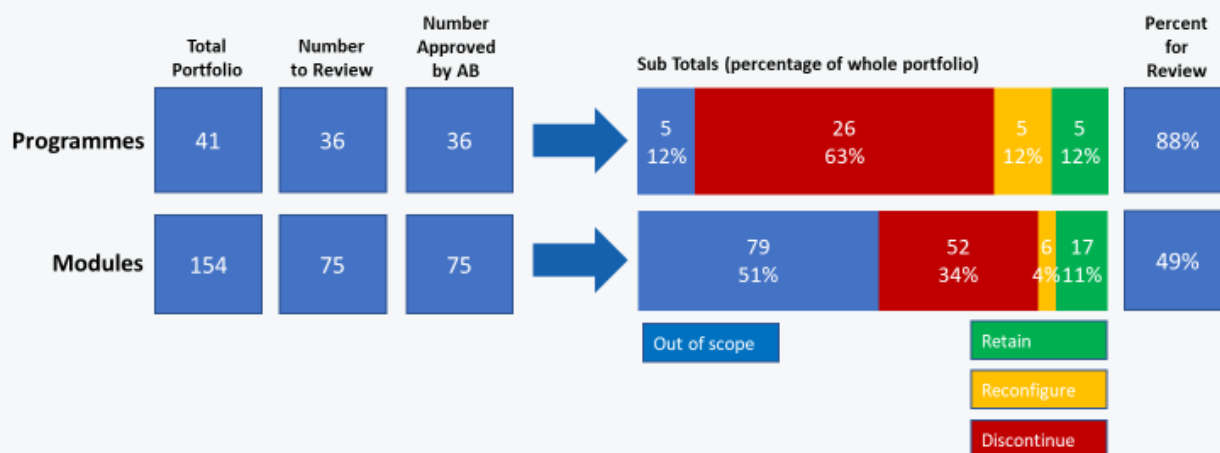
In-scope portfolio



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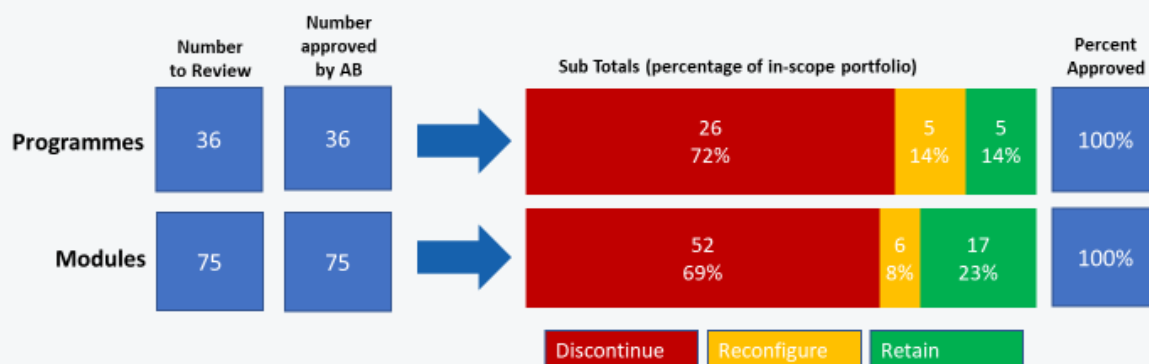
Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care

Full portfolio



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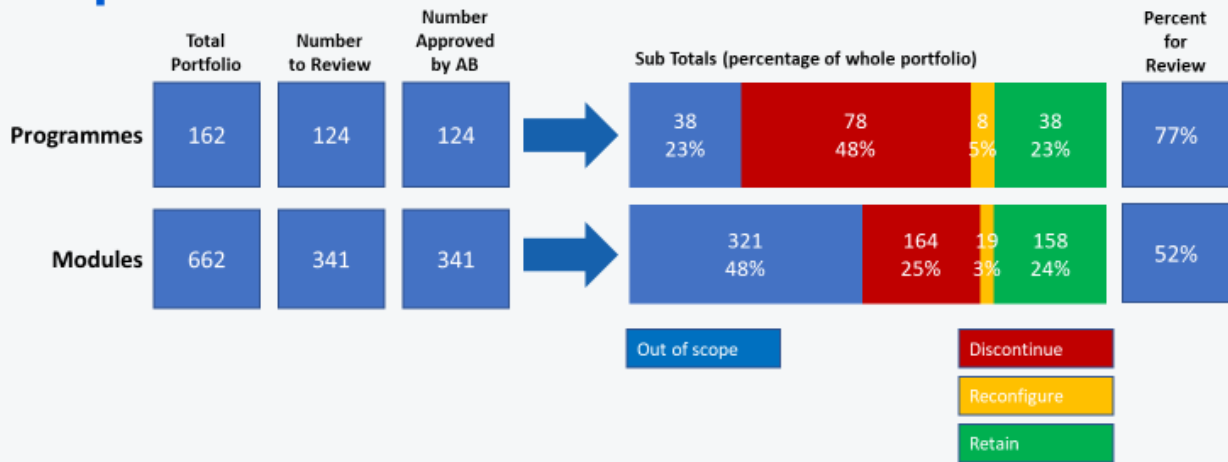
In-scope portfolio



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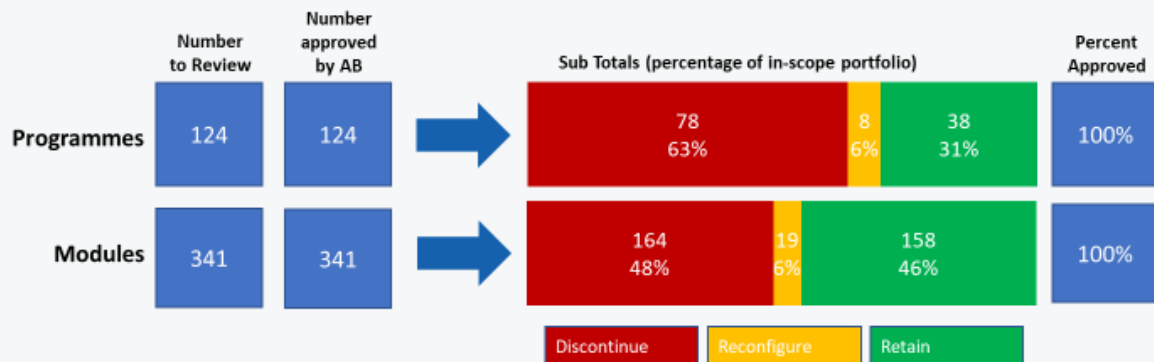
Faculty of Social Science & Public Policy

Full portfolio



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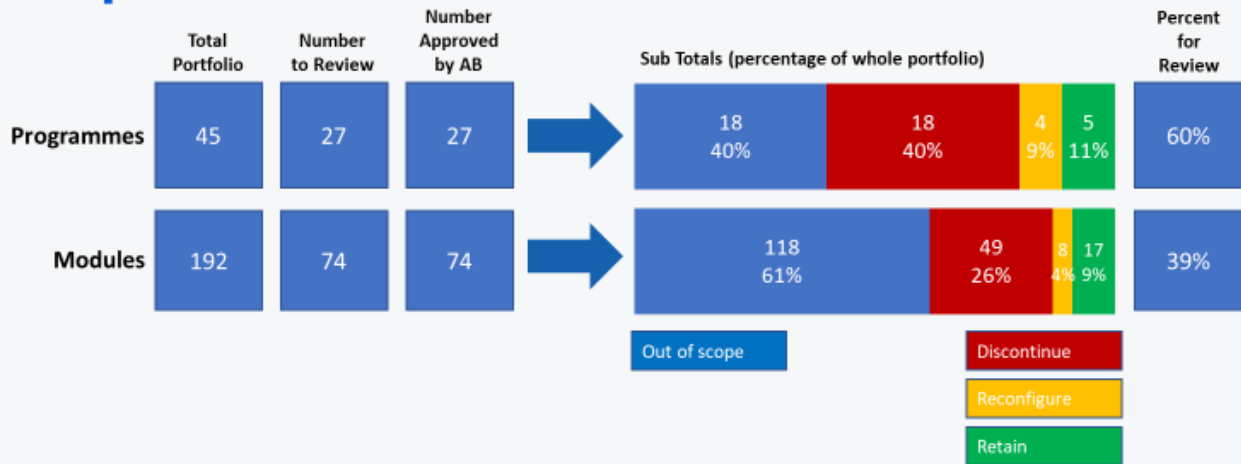
In-scope portfolio



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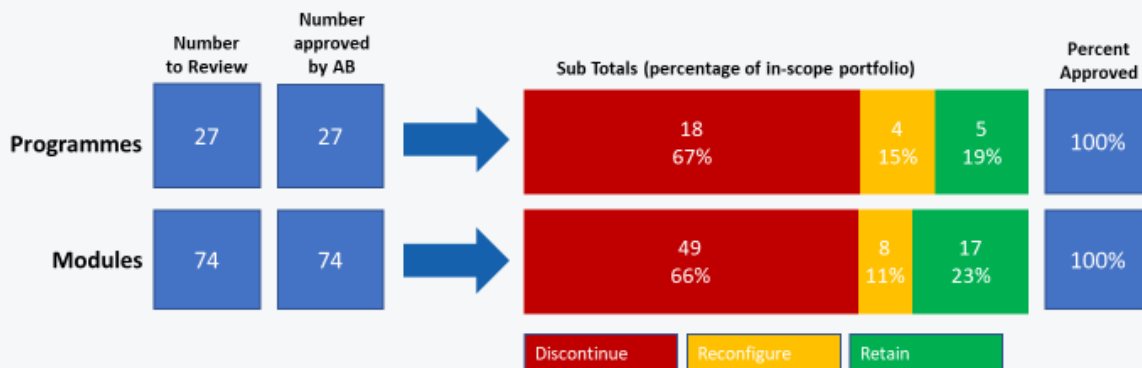
Institute of Psychiatry, Psychology & Neuroscience

Full portfolio



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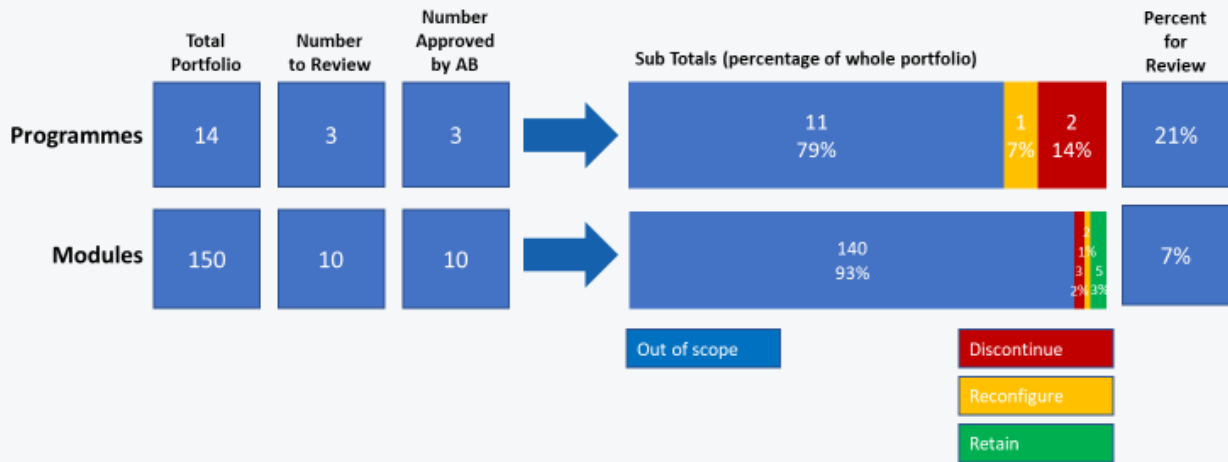
In-scope portfolio



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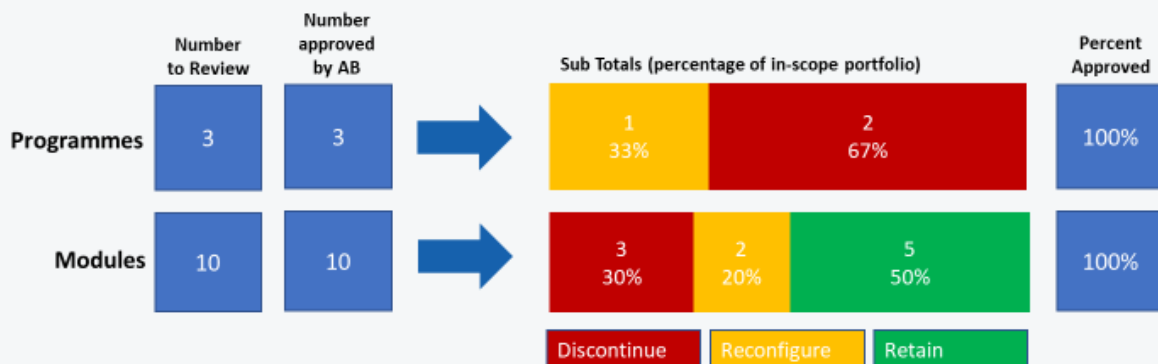
King's Business School

Full portfolio



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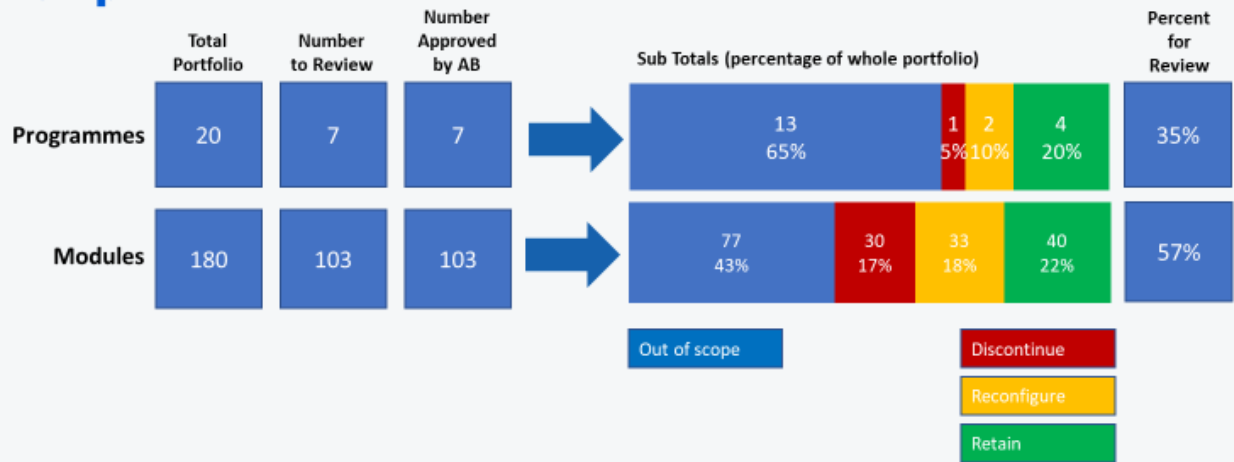
In-scope portfolio



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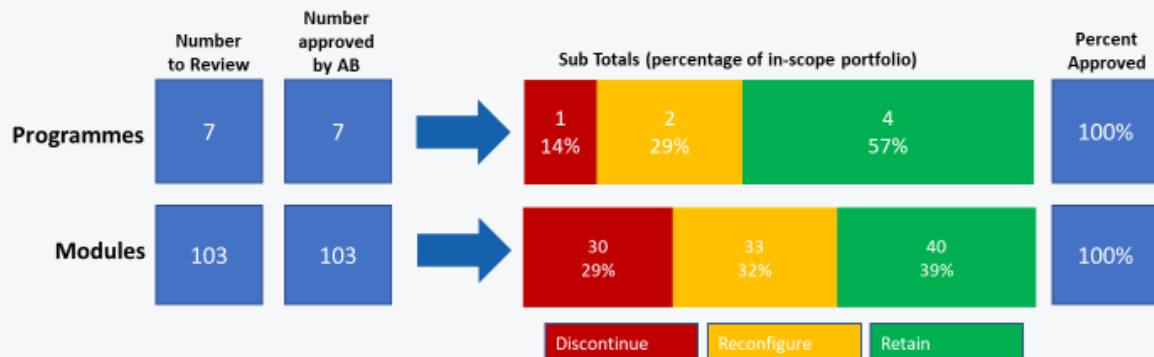
The Dickson Poon School of Law

Full portfolio



EDUCATE TO INSPIRE AND IMPROVE

In-scope portfolio



EDUCATE TO INSPIRE AND IMPROVE

Annual report to Council: ongoing conditions for Office for Students 2020/21

Introduction

The Office for Students (OfS) was established 1 January 2018. The OfS is now fully operational and monitors higher education providers using “lead indicators, reportable events and other intelligence such as complaints”¹. As part of this monitoring the OfS expects higher education providers to continue to meet ongoing conditions of registration, including any revised conditions since the initial registration process.

Governing bodies of universities also have a requirement to receive assurance from Academic Board that academic governance is effective. The CUC² Code states: ‘Governing bodies also need to provide assurance on academic standards and the integrity of academic qualifications and will work with the Senate/Academic Board (or equivalent, as specified in their governing instruments) to maintain standards and continuously improve quality. Governing bodies will also wish to receive assurance that specific academic risks (such as those involving partnerships and collaboration, recruitment and selection, data provision, quality assurance and research integrity) are being effectively managed’.

The intention of this report is therefore to provide:

- King’s College Council with assurance that OfS ongoing conditions of registration are being met.
- King’s College Council with assurance that appropriate quality assurance processes have been conducted in the academic year 2019/20 (see appendix 2). Where applicable updates on previously reported KPI’s³ are included in the report.
- An update on any changes to conditions of initial registration, introduced by OfS due to COVID-19 pandemic.

Due to the volume of conditions of ongoing monitoring, appendices have been used to report an update on each condition, where applicable. If the condition of registration is unchanged there will be no update reported.

Failure to comply with these ongoing conditions of registration will result in the OfS asking the QAA⁴ to conduct a Quality and Standards Review. This review is the process QAA will use to provide evidence to the OfS about whether providers referred by the OfS are meeting one or more of the Core Practices of the UK Quality Code for Higher Education (the Quality Code). Additionally, since 1 August 2019, the OfS may also impose a monetary penalty on a provider if it appears to the OfS that the provider is in breach of the ongoing conditions of

¹ Office for Students: Securing Secret Success: Regulatory framework for higher education in England

² Committee of University Chairs, updated guidance September 2020

³ Key Performance Indicators

⁴ Quality Assurance Agency in Higher Education

registration. Depending on the severity of the breach, the OfS may also determine to suspend or deregister a provider⁵⁶.

OfS Oversight Committee

Last year's report identified that some form of College oversight on how we continue to meet the Ongoing Conditions of Registration, identify reportable events, and respond to any OfS consultation was required. During the academic year, the College Secretary set up an OfS Oversight Committee, with areas involved with each Ongoing Condition of Registration having a representative sit on the Committee. Although the Committee has only met in person once, the Committee has inputted into consultations during the year via a Teams site e.g. Harassment and Sexual Misconduct (February 2020) and Student Protection Plans (August 2020).

COVID-19 Pandemic

In March 2020 the COVID-19 pandemic started, and the country entered a lockdown period. Universities had to move their teaching and assessment entirely into online formats for the remainder of the academic year. The OfS during this period revised its ongoing conditions of registration, in recognition of the disruption COVID-19 was having on universities, suspending some of its conditions, revising requirements for reportable events, and introducing new deadlines for submitting information to OfS.⁷ Section A of the report identifies the revised conditions of registration during the pandemic.

During the pandemic, the OfS and QAA produced numerous notes and guidance documents to aid universities manage the pandemic. On publication of each set of guidance, a review was undertaken on the measures taken by King's against the guidance to confirm that appropriate action was being taken.

Section A: Office for Students Ongoing Conditions of Registration

The OfS regulatory framework⁸ notes the following:

"To remain registered, a provider must continue to meet the definition of 'an English higher education provider' and must demonstrate that it satisfies the ongoing general conditions of registration applicable to the category of the Register in which it is registered. It must also satisfy any specific ongoing conditions that have been applied. Likewise, the OfS will have regard to its general duties in applying any ongoing specific condition of registration" [Securing student success: Regulatory framework for higher education in England, para 113].

⁵ <https://www.officeforstudents.org.uk/media/2f8f3591-ed72-4827-a16d-bd4e383d7226/ofs-scheme-of-delegation-3-july-2019-version-8.pdf> para 29.

⁶ The OfS commenced consultation on the monetary penalties in March 2020, but suspended the consultation when Covid-19 pandemic occurred (<https://www.officeforstudents.org.uk/publications/consultations/>)

⁷ <https://www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/regulatory-requirements/>

⁸ Securing student success: Regulatory framework for higher education in England: https://www.officeforstudents.org.uk/media/1406/ofs2018_01.pdf

The general ongoing conditions of registration are as follows, and the table indicates if the condition was changed due to COVID-19 pandemic⁹, along with whether updates are required to be reported to Council and potentially OfS (if the updates necessitate it):

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
A: Access and participation for students from all backgrounds				
Condition A1	An Approved (fee cap) provider intending to charge fees above the basic amount to qualifying persons on qualifying courses must: <ul style="list-style-type: none"> i. Have in force an access and participation plan approved by the OfS in accordance with the Higher Education and Research Act 2017 (HERA). ii. Take all reasonable steps to comply with the provisions of the plan. 	Y	N	See appendix 1 to update on enhanced monitoring condition
Condition A2	An Approved (fee cap) provider charging fees up to the basic amount to qualifying persons on qualifying courses must: <ul style="list-style-type: none"> i. Publish an access and participation statement. ii. Update and re-publish this statement on an annual basis. 	Y	N	n/a
B: Quality, reliable standards and positive outcomes for all students				
Condition B1	The provider must deliver well designed courses that provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed.	Y	N	See appendix 2 for update on how this was managed during COVID-19
Condition B2	The provider must support all students, from admission through to completion, with the support that they need to	Y	N	See appendix 2 for update

⁹ A letter from the OfS on 30th July, notes a revised return to these conditions will now occur: https://www.officeforstudents.org.uk/media/8d49fac7-5757-4b9f-9c29-4ce0d95da50d/update_office_for_students_approach_to_regulation_and_information_about_deadlines_for_data_returns.pdf

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
	succeed in and benefit from higher education.			on how this was managed during Covid-19
Condition B3	The provider must deliver successful outcomes for all of its students, which are recognised and valued by employers, and/or enable further study.	Y	N	See appendix 2 for update on how this was managed during Covid-19
Condition B4	The provider must ensure that qualifications awarded to students hold their value at the point of qualification and over time, in line with sector recognised standards.	Y	N	See appendix 2 for update on how this was managed during Covid-19
Condition B5	The provider must deliver courses that meet the academic standards as they are described in the Framework for Higher Education Qualifications at Level 4 or higher.	Y	N	See appendix 2
Condition B6	The provider must participate in the Teaching Excellence Framework and Student Outcomes Framework.	Y	Y	See appendix 2 for update on TEF
C: Protecting the interests of all students				
Condition C1	The provider must demonstrate that in developing and implementing its policies, procedures and terms and conditions, it has given due regard to relevant guidance about how to comply with consumer protection law.	Y	N	See appendix 3 for update on how this was managed during Covid-19
Condition C2	The provider must: i. Co-operate with the requirements of the student complaints scheme	Y	N	See appendix 3 for update on how this

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
	<p>run by the Office of the Independent Adjudicator for Higher Education, including the subscription requirements.</p> <p>ii. Make students aware of their ability to use the scheme.</p>			was managed during Covid-19
Condition C3	<p>The provider must:</p> <p>i. Have in force and publish a student protection plan which has been approved by the OfS as appropriate for its assessment of the regulatory risk presented by the provider and for the risk to continuation of study of all of its students.</p> <p>ii. Take all reasonable steps to implement the provisions of the plan if the events set out in the plan take place.</p> <p>iii. Inform the OfS of events, except for the closure of an individual course, that require the implementation of the provisions of the plan.</p>	Y	N	See appendix 3
D: Financial sustainability				
Condition D	<p>The provider must:</p> <p>i. Be financially viable.</p> <p>ii. Be financially sustainable.</p> <p>iii. Have the necessary financial resources to provide and fully deliver the higher education courses as it has advertised and as it has contracted to deliver them.</p> <p>iv. Have the necessary financial resources to continue to comply with all</p>	Y	Y	n/a

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
	conditions of its registration.			
E: Good governance				
Condition E1	The provider's governing documents must uphold the public interest governance principles that are applicable to the provider.	Y	N	n/a
Condition E2	The provider must have in place adequate and effective management and governance arrangements to: <ul style="list-style-type: none"> i. Operate in accordance with its governing documents. ii. Deliver, in practice, the public interest governance principles that are applicable to it. iii. Provide and fully deliver the higher education courses advertised. iv. Continue to comply with all conditions of its registration. 	Y	N	n/a
Condition E3	The governing body of a provider must: <ul style="list-style-type: none"> i. Accept responsibility for the interactions between the provider and the OfS and its designated bodies. ii. Ensure the provider's compliance with all of its conditions of registration and with the OfS's accounts direction. iii. Nominate to the OfS a senior officer as the 'accountable officer' who has the responsibilities set out by the OfS for an accountable officer from time to time. 	Y	N	n/a
Condition E4	The governing body of the provider must notify the OfS of any change of which it becomes aware which affects	Y	Y	See appendix 4

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
	the accuracy of the information in the provider's entry in the Register.			
Condition E5	The provider must comply with guidance published by the OfS to facilitate, in co-operation with electoral registration officers, the electoral registration of students.	Y	N	n/a
Condition F: Information for students				
Condition F1	The provider must provide to the OfS, and publish, in the manner and form specified by the OfS, the transparency information set out in Section 9 of HERA.	Y	Y	See appendix 5
Condition F2	The provider must provide to the OfS, and publish, information about its arrangements for a student to transfer.	Y	N	n/a
Condition F3	<p>For the purpose of assisting the OfS in performing any function, or exercising any power, conferred on the OfS under any legislation, the governing body of a provider must:</p> <ul style="list-style-type: none"> i. Provide the OfS, or a person nominated by the OfS, with such information as the OfS specifies at the time and in the manner and form specified. ii. Permit the OfS to verify, or arrange for the independent verification by a person nominated by the OfS of such information as the OfS specifies at the time and in the manner specified and must notify the OfS of the outcome of any independent verification at the time and in the manner and form specified. iii. Take such steps as the OfS reasonably requests to co-operate with any monitoring or investigation 	Y	Y	See appendix 5

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
	<p>by the OfS, in particular, but not limited to, providing explanations or making available documents to the OfS or a person nominated by it or making available members of staff to meet with the OfS or a person nominated by it.</p> <p>The requirements in paragraphs (ii) and (iii) do not affect the generality of the requirement in paragraph (i).</p>			
Condition F4	For the purposes of the designated data body (DDB)'s duties under sections 64(1) and 65(1) of HERA, the provider must provide the DDB with such information as the DDB specifies at the time and in the manner and form specified by the DDB.	Y	Y	See appendix 5
G: Accountability for fees and funding				
Condition G1	A provider in the Approved (fee cap) category must charge qualifying persons on qualifying courses fees that do not exceed the relevant fee limit determined by the provider's quality rating and its access and participation plan.	Y	N	n/a
Condition G2	A provider must comply with any terms and conditions attached to financial support received from the OfS and UK Research and Innovation (UKRI) under sections 41(1) and/or 94(2) of HERA. A breach of such terms and conditions will be a breach of this condition of registration.	Y	N	n/a
Condition G3	<p>The provider must pay:</p> <p>i. It's annual registration fee and other OfS fees in accordance with regulations made by the Secretary of State.</p>	Y	N	See appendix 6 for update on payment of fees for 2020/21

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Revised condition of registration due to Covid-19: Y/N	Appendix noting updates
	The fees charged by the designated bodies.			

On 3 July the OfS, in response to COVID-19 pandemic, introduced a time-limited Condition of Regulation: Condition Z3: Temporary provisions for sector stability and integrity¹⁰. This condition allowed the OfS to take action against higher education providers that used offer-making practices that would not be in the interests of students and the wider higher education sector, during these exceptional circumstances (see appendix 7 for further information).

Conclusion

Assurance can be given that King's continues to meet the ongoing conditions of registration of the Office for Students.

Additionally, as appendix 2 highlights, King's has the necessary quality assurance processes in place to enable it to set and maintain appropriately the standard of King's awards and to identify and act upon areas of the student academic experience that require improvement. Where such areas are identified, oversight of action taken is maintained through the institutional governance structure.

¹⁰ <https://www.officeforstudents.org.uk/media/e2e8c6e5-b713-416a-8abc-cb40fbed6947/regulatory-notice-5-temporary-condition-z3.pdf>

Appendix 1:

Condition A update: Access and participation for students from all backgrounds

The OfS approved the College's 2019/20 Access and Participation Plan (APP) which 'stands alone' for that academic year. The OfS then approved the 2020/21-2024/25 Access and Participation Plan that covers the next five years and is automatically rolled over each year subject to satisfactory progress. For both the 2019/20 APP and the 2020-2025 APP the OfS approval came with an 'enhanced monitoring' requirement. This is not a formal condition of registration but is used when the OfS identifies a specific area in which they expect to see further action or greater demonstrable progress. A report on this area specifically will be required in addition to the 'standard' light touch annual monitoring. The OfS has not yet specified how exactly the enhanced monitoring reporting will work in practice.

King's 'enhanced monitoring' is to conduct further analysis demonstrating the impact of the financial support (bursaries) laid out in the APP to increase access and support student retention. We have conducted previous analyses but the OfS has indicated that it is sceptical of the efficacy of bursaries sector-wide. As such, it has indicated that institutions that direct a significant proportion of APP-allocated funding into bursaries should conduct more extensive evaluation to evidence their effects. Should we not be able to demonstrate impact, the assumption is the OfS will expect us to reduce the amount of financial support available. This requirement is in place for both 2019/20 and 2020/21. For 2020/21 we will also be expected to provide more detail on student engagement in planning, delivery and monitoring of the measures set out in the APP.

The following provides an update on how this enhanced monitoring is being undertaken:

1. Previous bursary analysis involved using the toolkit created by the Office For Fair Access (OFFA, which the OfS replaced). This provided a statistical model to look at outcomes for bursary recipients from two-year groups. This tool was not effective for an institution like King's, where every student eligible for a bursary receives one. There is no easy comparator group to look at different effects.
2. As a result, the What Works team within the Widening Participation department conducted further analysis that took a more sophisticated approach, using a recursive discontinuity design (RDD) to provide more meaningful points of comparison.
3. It was possible to draw only limited conclusions from these successive analyses: although the RDD approach was recommended by OFFA it involved comparing students at either side of the household income eligibility threshold (ie progression of students who 'just missed out' on receiving a bursary). This did not generate any significant findings.
4. In 2019/20 we have built on this further to take a two-pronged approach. We are running the OfS toolkit and a version of the previous analysis using a much bigger population (all year groups for which we have data). We will also bring in a machine learning approach to interrogate the data in a different way. This is underway and will be complete in October in time for the monitoring report.
5. We have also initiated a research project as part of a PhD that is reviewing the evidence base and literature sector-wide and will lead to a series of lab tests and potential trialling of new approaches to communicating and issuing bursaries. This will

provide a higher standard of causal evidence, including a randomised control trial. This began in 2019/20 and will run until 2021/22.

The enhanced monitoring relating to student engagement applies for the 2020/21 academic year. The Associate Director of Widening Participation will lead on this, with an action plan being finalised in October 2020. However, the Secretary of State for Education and the Universities Minister have recently written to the Office for Students requesting a pause to enhanced monitoring as part of a shift to 'reduce bureaucratic burden' on universities¹¹. It is unclear if this applies to the reporting on 2019/20 currently being finalised and the future requirements for 2020/21. We are awaiting clarification on this from the OfS.

In line with OfS requirements, the APP is hosted on King's website here:

<https://www.kcl.ac.uk/study/widening-participation/ofs>

The Associate Director of Widening Participation has oversight of the Access and Participation Plan. Reporting is via the Senior Management Team for activity relating to Vision 2029 delivery and to Council for activity relating to academic policies and practice.

Covid-19 Mitigation

Our Widening Participation work to deliver fair access to King's for underrepresented students is a regulatory requirement, with specific targets and expectations. Once schools closed nationwide and King's moved to remote working, KCLWP quickly moved its signature programmes online using a mixture of platforms. Elements that could be converted to 'static' online resources were done quickly. The flagship programmes made up of live events were converted to online programmes: Medview, Dentview, K+ and our Sutton Trust summer school. As such, this year's cohort of Year 12 students did not miss out and progress will not be lost. The programmes we developed will also become sustainable ongoing resources that we can retain as part of our standard programme to expand our national reach in the future, even once we return to face to face delivery.

Other core aspects of work, including teacher and social worker CPD (King's Advocate Award) and community engagement (Parent Power engagement projects in both English and Spanish) also shifted successfully online. We also continued with our new work developing tuition support for students from Gypsy, Roma and Traveller backgrounds.

As part of mitigation we put in place clear plans for current Year 13 students who had made applications to King' already, and signposting for parents, teachers and prospective students to ensure that the gains we have made in widening participation in recent years could be protected as much as possible. Offer holders who qualified as 'WP students' were flagged and prioritised as part of the admissions decision-making in response to the changes to A level awards.

In terms of successful applicants from WP programmes, the table below summarises current year-on-year progress, including the cycle impacted by the pandemic:

¹¹ <https://www.officeforstudents.org.uk/media/ff210430-510a-4224-8b5b-6b1f74635860/ofs-strategic-guidance-14092020.pdf>

Scheme	Number of successful applicants 2018/19	Number of successful applicants 2019/20	Number of successful applicants 2020/21	YoY change
Dentview	N/A	7	12	+5
K+	66	75	87	+12
Medview	N/A	5	7	+2
Realising Opportunities (all host universities)	24	34	54	+20
Sutton Trust	13	14	21	+5
Vulnerable Groups*	35	52	43	-9
Grand Total	140	185	214	+29

* 'Vulnerable groups' refers to students with experience of local authority care, students who are estranged from their families or forced migrants.

In addition to the above, we have institutional statistical targets that are statutory requirements in our Access and Participation Plan. These are to increase access of underrepresented students defined by specific postcode metrics and ethnicity. We are currently collating the data on these targets for the most recent cycle.

In terms of other work covered by King's APP in student success and progression, all work was either retained online or, where paused, had a clear set of mitigations to make sure students continued to receive support.

The OfS wrote to institutions and noted that expenditure on APP commitments should not be automatically reduced, but that resource could be reallocated to where there was most urgent need for students. Financial support that had been committed was delivered, both in terms of bursaries and hardship funding. We put in place a process for distributing laptops and internet access to students affected by 'digital poverty' and without access to equipment, given the rapid pivot to online learning for the remainder of 2019/20. The OfS indicated that the five-year APPs would not be 'reopened' or changed at this time, and we therefore continued our planning on this basis, including the strategic measures and spend commitment in the plan for the coming year.

Appendix 2:

Condition B update: Quality, reliable standards and positive outcomes for all students

This part of the ongoing conditions continues to be demonstrated by the QAA Higher Education Review outcome report King's received in 2016.¹² In a recent letter from the Universities Minister¹³, the OfS will be suspending the 5% random sampling that was going to be introduced in 2019/20. We await further information on what may (if anything) be introduced in its place; otherwise our next review will only occur if the OfS asks the QAA to conduct a Quality and Standards Review if they have concerns on our meeting the conditions of registration.

However, King's does continue to review its quality assurance processes, ensuring compliance with external regulatory developments and the following work completed during 2019/20 demonstrates this commitment to continue to meet the conditions of Condition B: Quality, reliable standards and positive outcomes for all students, even during the Covid-19 pandemic:

Condition B1: high-quality academic experience and student's achievement is reliably assessed

Work continues on implementing the Education Strategy 2017 – 2022, which is transforming our approach to education and the student experience. During 2019/20 the following updates were reported to College Education Committee and Academic Board (where appropriate):

- 10 Innovation modules at levels 5 - 7 were approved for 2020/21. As of 17th September 2020, 8 modules (levels 5 – 6) have been confirmed to run, and the two level 7 modules are still being recruited to.
- Calls for proposals for minors and interdisciplinary modules went out to faculties during the year. Due to the pandemic, the deadline for submitting proposals to the College is now February 2021, with Faculties providing an update on progress-to-date in December 2020.
- The Academic Strategy for 2020/21 (approved by Academic Board on 29th April 2020¹⁴) encourages early adoption of principles from the flexible curriculum for 2020/21, including sharing of modules.
- In line with the new policy on credit harmonisation, one faculty has been changing their UG credit structure from multiples of 20, to multiples of 15 for 2020/21. Remaining faculties who are required to make these changes will be working on these during 2020/21. Another faculty has been changing their PGT credit structure from multiples of 20, to multiples of 15 for 2020/21.

¹² <https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports/King-s-College-London>

¹³ <https://www.officeforstudents.org.uk/media/ff210430-510a-4224-8b5b-6b1f74635860/ofs-strategic-guidance-14092020.pdf>

¹⁴ AB-20-04-29-05.2 Annex 4

- While implementation of the new Degree Algorithm has been delayed to 2021/22, Academic Board agreed at its meeting in June 2020 to remove the first year from the degree algorithm in 2020/21 too. This follows the move in 2019/20, as a mitigation to Covid-19, to remove first year marks from the degree algorithm (see below in Covid-19 mitigation section for further details).
- Work on the internationalisation of the curriculum continues and the following is in progress:
 - Cultural competency: a cross-faculty working group has been established with leadership from Arts and Humanities to develop a blended module available to students and staff in all faculties.
 - Global problem solving: the Principal's Global Leadership Award has been upscaled at PGT to an online 15-credit module available to all students from all faculties. Plans to increase provision at UG level are underway and cross-College optional module in applied global problem solving is also in development open to all disciplines.
 - Decolonisation of the curriculum: Consultation and planning is ongoing to realise decolonisation as an outcome of internationalisation of the curriculum.
- Following an extensive review of programmes and modules, Curriculum Commission has put forward a number of programme and module closures and revisions during this academic year, along with a number of programmes and modules to be retained as they are. The programme and module closures will allow programme teams to embrace the Education Strategy and introduce flexibility into their curriculum.
- The Curriculum Commission set up three working groups to review: intercalated degrees; intercollegiate degrees; and study abroad arrangements where this is optional to a programme of study. All three working groups put forward a series of recommendations and work will now commence on taking forward these recommendations during 2020/21.

Covid-19 mitigation

In March 2020 the Country went into lockdown due to the Covid-19 pandemic. The whole university moved to online teaching, learning and assessment. While the OfS revised some aspects of its ongoing conditions of registration, it still expected providers to deliver a high academic experience and enable student assessment to be fairly and reliably assessed. The Quality Assurance Agency for Higher Education (QAA) published some guidance documents to aid providers during this pandemic, highlighting good practice providers might like to consider. We used these documents to check that the mitigations we put in place followed this good practice, and assurance can be given that our mitigations adhered to those suggested by the QAA.

The College, in response to Covid-19, did the following:

Teaching and learning:

- The immediate priority in March was to support the shift to online teaching and learning for the remainder of 2019/20 academic year, encompassing the significant bulk of our provision. It was not possible to move all aspects of teaching online for the last couple of weeks of term, for instance where teaching was heavily clinical, or laboratory based. Many students also had to revise plans for dissertation and projects, where their planned work required access to facilities like archives, laboratories, or performance studios, or the possibility to conduct field research. Departments and Faculties looked at possibilities – where feasible – for some of our students to be able to make up for some of the lost opportunities in the future.
- To support staff and students, a webpage with dedicated resources to support online teaching was launched.
- Working with KCLSU and faculties, student feedback was gathered on a range of issues, such as the impact of timetabling on online learning and assessment, and equity of access to laptops and Wi-Fi. A process was put in place to ensure students who needed them had access to laptops and Wi-Fi dongles.
- A comprehensive Academic Strategy for education in the 2020/21 academic year was devised and implemented.
- During the summer months, training has been provided to academic colleagues on online teaching and learning, to provide a more standardised online learning delivery in 2020/21. This has also included testing and training staff on the use of a 'Hyflex' model of learning, where there will be a combination of students sitting in the classroom with a lecturer, while others are online.
- Significant investment has been channelled into equipping teaching spaces with enhanced technology to support the Hyflex model.

Assessments

A set of principles was agreed to inform our approach to assessment in spring/summer 2020, as follows:

- Our priority was the well-being of both students and staff during this period, and an approach which offers fairness and equity across the university.
- Commitment to the maintenance of academic standards and the quality of our students' education, as well as the quality of the degrees and professional training they will take from King's.
- Provide opportunities for students to continue their studies and complete the academic year, and we seek to support all students to progress or graduate as planned.
- Providing as much academic continuity as possible in the interests of students.

- Cater for the difficult circumstances which many students will experience, the emphasis is on making all assessments inclusive and fair for all students, and introducing the right kinds of flexibility, progression arrangements, and enhanced mitigation to ensure that their outcomes are not adversely affected by this period of crisis.
- Need to be realistic and pragmatic about what can be achieved under these adverse circumstances, recognising the challenges for both students and staff.

Taking into consideration these principles, the following outlines the approach taken to mitigate against Covid-19:

- For first year students, the degree algorithm was adjusted to remove the first-year marks from the equation. The aim was to relieve some of the pressure on the first-year students without compromising academic standards.
- The assessment period 2 was extended to run for 9 weeks, from 27th April to 26th June 2020. The standard assessment period 3 was run between 24 August to 4 September.
- Across faculties, assessment formats were altered to allow students to complete them remotely. This included, where appropriate and justified, replacing some unseen, timed exams with open-book exams, or alternative forms of coursework. Departments also worked to consolidate and reduce the overall volume of assessments where the learning outcomes for the year or programme could be demonstrated to have been met. All assessment plans were tailored to avoid any disadvantage to students arising from their geographical location and time zone. Arrangements for Personalised Assessment Arrangements (PAA) students were preserved.
- Students were strongly encouraged wherever possible to take assessments in period 2 and period 3, but it was understood that there may have been a range of good reasons why students were unable to do this. The aim of the College has been to explore all possible ways to enable students to sit their assessments in 2019/20 academic year, and progress or graduate on time. If a student was unable to complete their assessment in assessment period 3, then they had the option to interrupt their students and take their assessments in the next academic year. However, as this decision affects a student's progression and graduation, and may also have implications for career progression, progression recognition if the programme is regulated by a Professional, Statutory or Regulatory Body (PSRB), and visa implications, students were asked only to take this approach after they had sought advice and considered the implications carefully.
- A streamlined process was introduced for considering mitigating circumstances, where students were required to provide details of the reason for the request but were not required to supply evidence. Students were asked to use the MCF process where they had known in advance that they were unable to take an assessment and were asked to submit such requests by 26th April 2020 (for assessment period 2). Students were also using this process when they experienced unexpected difficulties in undertaking or completing their assessments due to Covid-19 related issues.

- The College identified instances where a student's domestic circumstance may have meant that they were unable or ill-equipped to take their assessments in either period 2 or 3, and the College liaised with KCLSU on possible solutions for those students.
- The College introduced a Safety-Net policy to ensure no student would be disadvantaged academically by the impact of the Covid-19 pandemic. A range of 'safety net' arrangements were put in place to manage any negative impact on students' outcomes.
- A revision to the progression rules for first year students was approved; if a student did not meet the minimum requirements but had up to 30 credits in the condonable range, the regulation that prohibits condoned fails from being included in the progression minimum was suspended to enable the student to progress carrying up to 30 deferred credits.
- To aid staff with the marking period, the Chair of Academic Standards Sub-Committee approved the following approach:
 - Double marking for all dissertations
 - Single marking with retrospective sampling of at least 10% for all other work.
- External Examiners: all External Examiners were contacted in April 2020 advising them that the College had implemented the Emergency Regulations. This allowed for programme teams to make any necessary changes to the assessments that had been previously approved by the External Examiner, without gaining their consent for the changes. Assessment Sub-Board meetings were also moved to be held virtually, and where an External Examiner may have been unable to attend the meeting (due to the late notice of changing meetings in response to the extended assessment period 2), the Emergency Regulations had in place measures to ratify results without External Examiners in attendance. On reviewing External Examiner reports recently submitted, assurance can be given that all External Examiners approved the mitigations put in place by the College and Faculties, with many External Examiners praising the decisions made, and confirming that academic standards were maintained. For example, an External Examiner in Arts and Humanities noted, "the College and Department's response to Covid-19 was exceptional".

In going forward for 2020/21, Academic Board approved at its June 2020 meeting to remove the first-year marks from the degree algorithm for a further year. The Emergency Regulations that were used during 2019/20 have now been replaced with the standard academic regulations and all programmes will return to utilising their External Examiners as usual practice. A "wash up" of how assessment was managed during 2019/20 is being undertaken, with lessons learned to guide how assessments online should be managed during 2020/21, while Covid-19 continues.

A staff and student FAQ webpages were set up, providing information and updates on all of the above.

Assessment Sub-Boards will be reviewing how these mitigations for Covid-19 have impacted the students' assessment during the Board meetings, and Assessment Boards will report to the Academic Standards Sub-Board in 2020/21 findings from this review.

Students' academic experience

Students' academic experience is monitored by King's via student surveys, including the National Student Survey, Postgraduate Taught Experience Survey and Postgraduate Research Experience Survey. Due to the Covid-19 pandemic the College decided not to participate in the Postgraduate Taught Experience Survey (PTES), and the Postgraduate Research Experience Survey (PRES) is held every other year, with 2019 being the last year to run the survey. The following outlines the response we therefore had with the National Student Survey (NSS) that continued to run during 2020, regardless of the pandemic:

Indicator	Result	Benchmark (average across Russell Group)	Benchmark against sector	RAG ratingⁱ
NSS 2020 overall satisfaction	77.5%	82.7%	82.78%	

National Student Survey (NSS) 2020

Responses to the NSS showed a decrease in satisfaction from last year (2.9%). Disappointingly there are a number of areas in the survey where the university's results are significantly below the OfS benchmark. The following all scored *significantly below the benchmark*¹⁵:

- All of the questions in assessment and feedback (down 2% from the previous year) and learning community (down 0.5% from previous year);
- All bar one question in the areas of academic support, organisational management, and student voice;
- Overall satisfaction and student union questions have for a second year running scored *significantly below the benchmark* (just 46.4% students agreeing for student union question).

Concerning is the large drop in satisfaction amongst Black students, which already have the lowest overall satisfaction, experienced a further decrease of 11%, compared to just a drop of 2.6% amongst White students.

¹⁵ Office for Students term

EU students (excluding UK) had the biggest decrease in satisfaction, dropping by 5.9% compared to decreases of 2.4% for UK domiciled students and 1.9% for Non-EU domiciled students.

In comparing King's overall satisfaction to the rest of the sector and the Russell Group, the sector saw a decline in overall satisfaction by 1% and the Russell Group by 1.2%.

The highest scoring section remains Learning Resources and Teaching, despite this area also seeing a drop-in satisfaction by 1.1% and 1.7% respectively.

The highest scoring question was *"the course is intellectually stimulating"* with 87.2% compared to a sector average of 84.5%.

9 programmes achieved an overall satisfaction score of 90%+, including 2 programmes scoring 100% satisfaction.

The Business School continued its trend of improving scores. It was the only faculty that saw an improvement in overall satisfaction. FoLSM remained broadly constant, whereas the other faculties experienced a decrease.

The Institute of Psychology, Psychiatry and Neuroscience remains the faculty with the highest overall satisfaction score (though it saw a decline in satisfaction), followed closely by the Law School.

The GKT School of Medical Education built upon last year's improved results and achieved further increases in satisfaction, up to 84% in this year's results (compared to 64% in 2018). Assurance can therefore be given that the measures put in place in recent years are now seeing some positive results.

The question, *"it is clear how feedback on the course has been acted on"* scored just 49.1%, thus demonstrating that more work needs to be done on "closing the loop".

For those areas where we received disappointing results, we are scrutinising the data and free text comments, and the Vice-President/Principal (Education) and Director of Students and Education are engaging with departments, faculties and professional services areas to have targeted action plans, focusing on 'hygiene factors' currently impacting the student experience.

Condition B2: Support for all students

Work continues in this area in relation to the Education Strategy. The following outlines the work that has continued during this academic year:

- A Student Experience Workstream was established during the pandemic to keep an overview of the student experience during the remainder of the academic year. This workstream has continued and is now looking at the non-curriculum experience for new students including enrolment, community building etc.
- Programme teams have been encouraged to adopt the King's Year First Year principles for 2020/21, including pre-arrival activity and an enhanced online-learning provision.
- Development of the Personal Tutor Dashboard was put forward as a Service Improvement Project to IT - work is still to be undertaken on this though.

Covid-19 mitigation

During the pandemic we made sure that support services remained available to students via transferring the services online. A Welfare and Student Services working group was established, to consider how to support students during the pandemic. The key objectives of this group were:

- Support student welfare and wellbeing in a remote learning environment
- Support digitalisation of information, advice and guidance (IAG) services and resources
- Manage operational risk to Student Support Services
- Support provision of online services
- Advise on student complaints and appeals arising from Covid-19
- Advise on issues and solutions for mobility and placement programmes in 2020/21.

Work that this group completed included, as just some examples:

- Developed a set of Frequently Asked Questions (FAQ's) about remote teaching and learning, set up a generic email address for students to use to send in queries relating to Covid-19, and established a set of knowledge articles for the Students Services Online service.
- Ensured those students on placements and on study abroad were included in communications from the College and supported those students on study abroad requiring to come back to the UK; also supported those students who remained overseas to complete their placements.

- Careers and Employability team launched Next Steps programme to help students understand what was happening with recruitment and to help them think about self-development.
- Those international students who had difficulties in returning home and therefore remained on campus were supported by the residences team and a Hardship fund was made available to students who could not afford to return to their home country.
- Students who were identified as being “vulnerable” (sanctuary scholars, estranged, care leavers) were contacted by Specialist Advisers to “check-in” with them.
- Students who had Personalised Assessment Arrangements (PAA) were considered as per usual practice, even though examinations moved online. Where students required additional time, this was given to them.
- Students who required laptops and access to Wi Fi were able to contact the College and where able (some international restrictions applied) laptops and dongles were sent to the students (received 115 requests for laptops, and 64 requests for internet access).
- Monthly Personal Tutor updates were sent to Personal Tutors with a focus on supporting students remotely.

In going forward for 2020/21:

- As well as classroom content, we have considered the whole student experience – where we could substitute or provide an alternative form for elements of the on-campus and London experience, and where we cannot. As well as considering digital access to academic content, we provided, at an equivalent level where possible, access to resources (such as books and journals), access to support and advisory services, access to careers and employability services, and access to as many of the fun, stimulating and engaging dimensions of university life that makes the experience so memorable.
- A Student Digital Capabilities programmes was launched 8th September 2020 for incoming and returning students, to give them insight and skills in IT systems, specifically King’s system, to support students who may be unfamiliar with online learning.
- Personal tutoring is critically important in supporting students in this period of flexible teaching and learning. A Task and Finish Group for personal tutors was established during the summer to determine how the personal tutoring system will work during 2020/21. Tutors have been asked to continue to support their students ‘remotely’ as well as in more conventional face-to-face settings. The role of tutors in academic advising needs to account of alterations to the curriculum and assessment, and personal tutors are kept well informed about arrangements with key support services so that they are able to ‘signpost’ students effectively.
- There are restrictions on outward mobility in place for some time and the College has taken the decision not to go ahead with international mobility schemes in term 1 (though there is an exemption process in place where required). This had implications for integrated study/work abroad programmes as well as the experiences of wider group of students who opt for a study abroad semester. Those programmes who offer study abroad programmes, consideration has been had on how the study abroad element can be completed, with suggestions such as whether the study can be offered via online means, or extending a 3-year programme to 4-years

to allow students to undertake study abroad in 2021/22 (as a couple of examples). These considerations by programme teams have been undertaken in discussion with students.

Condition B3: Successful outcomes for all students, recognized and valued by employers, and/or enable further study

This year is the first year we have results from the Graduate Outcome Survey (GOS). Due to the differing nature of the survey, HESA have advised that it is not appropriate to compare results with the previous Destination of Leavers in Higher Education survey (DLHE).

For the 2017-18 cohort, King's had an overall response rate of complete responses of 45%. We met the HESA response rate targets for Overseas and Other EU sub-cohorts but failed to meet the targets for UK Full-Time (55% instead of target 60%), UK Part-Time (54% instead of target 60%) and Research Council funded (53% instead of target 65%). Overall partial responses were at 21%, so some of this data will contribute to the wider statistics in different questions. The lower response rates mean that we acknowledge the data provides an incomplete picture of our graduates' outcomes. While we didn't meet some of the targets, this was not something that we could manage. We are explicitly forbidden to engage with graduates directly, and there is a limit on what we can do to get graduates to respond to the survey. We have a database that is sophisticated – better than others, and relatively our rates are higher than many competitors.

However, the survey's new questions, particularly capturing more effectively self-employment outcomes and the complexity of graduates' combined work and study outcomes, and also the Reflection questions about meaningfulness to the graduate of their choice, provide richer data in terms of understanding graduates' lives and aspirations. Responses to the Reflection questions indicate that the significant majority of graduates of King's are achieving outcomes that are meaningful to them.

Key data (includes complete and partial responses):

- Activity:
 - Full-time employment: 54.02%
 - Full-time study: 13.2%
 - Combined employment and study: 10.77%
 - Part-time study: 7.11%
 - Unemployment: 4.07%
 - Overall 87.18% are in work or study

- Level of work:
 - High-skilled Work: 90.1%
 - Medium-skilled Work: 6.06%
 - Low-skilled Work: 3.47%
- Reflections:
 - Is your current activity meaningful?
 - 45.71% Strongly agree; 42.93% Agree
 - Does your current activity fit with your future plans?
 - 43.45% Strongly agree; 41.03% Agree
 - Is your current activity utilising your skills?
 - 41.05% Strongly agree; 33.83% Agree

Condition B4: qualifications awarded to students hold their value at the point of qualification and over time, in line with sector recognized standards

King's keeps an overview of degree outcomes via its Academic Standards Sub-Committee and an annual report on good honours degrees is submitted to the Committee at the beginning of the academic year for consideration. For 2018/19, the following table demonstrates how King's compares against the Russell Group:

<i>Indicator</i>	Result	Benchmark (average across Russell Group)	RAG ratingⁱⁱ
Percentage of good degrees 2018/19	86%	86%	

This demonstrates that in 2018/19 we were on par with our Russell Group peers for the awarding of good honours degrees.

External examiners

King's continues to utilize external examiners in the ratification of awards, and as usual practice, external examiners are asked to submit an annual report, asking for their confirmation that academic standards have been met. The following table illustrates King's use of external examiners:

External examiner reports 2018/19		RAG rating
Undergraduate		
Percentage of external examiner reports received ⁱⁱⁱ	98%	
Percentage of external examiners who had received an induction ^{iv}	100%	
Confirmation of assurance that academic standards are met ^v	100%	
Percentage of external examiner reports which include a concern on academic standards ^{vi}	12% (23 out of 189 reports)	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC ^{vii}	100%	
Postgraduate		
Percentage of external examiner reports received ^{viii}	93% ¹⁶	
Percentage of external examiners who had received an induction ^{ix}	100%	
Confirmation of assurance that academic standards are met ^x	100%	
Percentage of external examiner reports which include a concern on academic standards ^{xi}	5% (15 out of 284 reports)	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC ^{xii}	67% ¹⁷	

¹⁶ Due to Covid-19 pandemic occurring during the PGT external examiner report chasing, it was felt that external examiners would have mitigating circumstances for not providing their report, while they covered mitigation of Covid-19 within their own institution. Those few outstanding reports have therefore not been chased.

¹⁷ 5 reports are waiting for a formal response from the faculty. In comparison to last year, we have much improved in our responding to these reports, where only 11% of reports were responded to.

External examiners continue to endorse King's academic standards as equivalent to as or higher than comparable programmes in other Russell Group Universities and confirm that they are in line with QAA's *Framework for Higher Education Qualifications*. No serious issues were raised in the external examiner reports included in this analysis.¹⁸

Following agreement by Academic Board in 2018/19 the report template was revised to remove the request for external examiners to comment on "critical" matters (which often caused confusion in relation to what the External Examiner was meant to class as "critical") and asked instead for commentary on matters that may impact academic standards. Of those external examiners whose 2018/19 reports noted comments impacting academic standards, no one required a separate letter to the external examiner from the Chair of Academic Standards Sub-Committee (ASSC). As with all reports that have raised a concern on academic standards, the Chair of ASSC reviews the comment and provides a response within the report that is then returned to the external examiner with the remaining comments from the programme team.

General themes across 2018/19 external examiner reports were:

- Marking practices: issues highlighted around anonymous marking, use of full range of marks, transparency and consistency between markers.
- Marking schemes requiring a review and become standardised across some faculties.
- Inaccuracies in mark sheets considered by Assessment Sub-Boards.
- Time allocated for external examiners to review and comment on examination scripts in time for Assessment Sub-Board meetings.
- Changes to programmes being clearly relayed to external examiners.
- Use of full range of marks.
- Clearer process for moderation is required.

In line with sector concern around grade inflation, a small minority of External Examiners continue to comment on perceived grade inflation in their annual reports. There continues to be differing opinion on whether grade inflation can be seen at King's, with an External Examiner in Nursing, Midwifery and Palliative Care writing, "the underlying grading and academic standards and procedures are within bounds of appropriate academic judgement, so to be clear this is not a problem of standards that demands to be fixed". While an External Examiner in

¹⁸ As noted in overview reports submitted to Academic Board in February 2020 (AB-20-02-05-10.1) and June 2020 (AB-20-06-17-09.2 – Annex 3)

BSc Psychology wrote that though “awards were justified” the proportion of 1st awards was felt to be too high, and “may reflect an issue with the c-score algorithm that risks inflating grades at the 2:1 and 1st class boundary”. Academic Board agreed at its February 2020 meeting that this was an area to be kept under review. In addition, with the change in the degree algorithm following a review as part of the Education Strategy, the C-Score will be revised from 2020/21¹⁹ so the concerns that the C-Score may be inflating grades should be resolved.

Covid-19 mitigation

For 2019-20, the External Examiner report template was revised to include specific questions and a section on Covid-19. Overview reports on responses by External Examiners will be submitted to Academic Board during 2020/21, once a full review has been undertaken.

Condition B5: deliver courses that meet academic standards as described in the Framework for Higher Education Qualifications at Level 4 or higher

All King’s programmes adhere to the *Framework for Higher Education Qualifications* (FHEQ), and this adherence is checked by Faculties at the time the programme is given final approval. Guidance on this can be found in the Quality Assurance Handbook²⁰. Additionally, external examiners confirm in their annual reports that the programme under review adheres to the *Framework for Higher Education Qualifications*.

Condition B6: Participation in the Teaching Excellence and Student Outcomes Framework (TEF) [new condition]

King’s submitted a TEF provider submission in 2016 and was received a Silver award. Due to Covid-19 pandemic, it has been confirmed that this award has been extended until 2021²¹. The TEF process has been put indefinitely on hold, and we await further information from the DfE and OfS on its future.

¹⁹ Although the new Degree Algorithm relating to the Education Strategy doesn’t come into existence until 2021/22, Academic Board approved at its June 2020 meeting that the first year marks can be removed from the degree algorithm in 2020/21.

²⁰ <https://www.kcl.ac.uk/governancezone/governancelegal/quality-assurance-handbook>

²¹ <https://www.officeforstudents.org.uk/news-blog-and-events/press-and-media/work-to-develop-subject-level-tef-continues/>

Appendix 3:

Condition C update: Protecting the interests of students

Since the initial registration, the following updates are noted for the *Protecting the interests of students* section of ongoing conditions:

Condition C1: policies, procedures and terms and conditions have due regard to relevant guidance about how to comply with consumer protection law

The Students and Education Directorate is confident that King's remains compliant with consumer protection law, which applies to the relationship between King's College London and prospective and current undergraduate students. The university adopts a similarly consistent approach to postgraduate and online study.

Updates since the last return

Material Information and Marketing: The university continues to provide programme information sheets to applicants. Standard offer letter templates are also reviewed annually, and advice is sought from legal compliance.

The General Terms and Conditions are reviewed annually by the General Counsel and external advice was sought in 2020 by Pinsent Masons LLP. The revised Terms and Conditions were approved at the June 2020 meeting of Academic Board. KPED have commissioned a review of the Short Courses Terms and Conditions and are currently seeking external advice. This work is due to be completed in 2020/21.

General information about the experience and status of staff is publicly available on the King's website. Due to Covid-19 pandemic shifting priorities, the student handbook pilot that was meant to be only for one year in 2019/20, has now been extended to cover 2020/21 too. Full implementation of the revised handbook across all faculties is now expected in 2021/22.

Student Ambassadors are recruited annually for Open Days. This process is centralised and coordinated by the central Marketing team. Due to Covid-19, student ambassadors are also being used for online marketing events. For both on-campus and virtual events, training is provided to these students to ensure the students are confident in what to say to prospective students. For non-admissions staff based in the Marketing team or Wider Participation team, the Admissions team continue to run a two-hour training session covering how to use the telephone system and scripts to answer calls and deal with enquiries regarding course vacancies and meeting entry requirements.

Fees: King's is fully compliant with regard to fee publication. For prospective students, fees are published on course webpages. Students are notified by Registry Services how to access information on fees three months before they are due to enrol for their next year of study.

Complaints: Complaints at King's are managed through the Student Conduct and Appeals Office. Any CMA-related complaints are brought to the attention of the CMA Working Group by the Head of Student Conduct and Appeals. All timeframes, practices and principles recommended by the OIA are embedded within King's procedures and detailed in the G31 Regulation and associated appendix.

Any issues falling within the remit of the Advertising Standards Authority are routed through the Marketing team, but the CMA Working Group have oversight of any formal complaints.

Covid-19 mitigation

In June 2020, the OfS published guidance²² to providers on student and consumer protection during the pandemic. In response to this guidance, the Academic Regulations, Policy and Compliance team produced a guidance document for faculties, which confirmed guidance previously submitted in May to help guide programme teams put forward modifications to programmes and modules for 2020/21. Further guidance was produced detailing how and when to notify or consult offer holders or current students about proposed course changes. Applicants have also been advised that their faculty offer holder pages are regularly being updated and will provide further information about teaching delivery in semester one.

Condition C2: co-operate with requirements of student complaints scheme run by the Office of the Independent Adjudicator for Higher Education, including the subscription requirements [new condition]

<i>Complaints and Appeals 2019/20</i>	RAG rating
Compliance with the OIA's good practice framework: handling student complaints and academic appeals	
Average time taken to turnaround complaints and appeals ^{xiii}	23

²² <https://www.officeforstudents.org.uk/publications/guidance-for-providers-about-student-and-consumer-protection-during-the-pandemic/>

²³ Academic Appeals. Regulatory timeframe for Stage 1: 42 days, average case turnaround time for Stage 1 (844 cases): 20.5 days. Regulatory turnaround time for Stage 2: 42 days, average case turnaround time for Stage 2 (28 cases): 34.4 days. Complaints. Regulatory timeframe for Stage 2: 35 days, average case turnaround time for Stage 2 (816 cases - 681 Strike Action complaints, 20 Covid 19 Complaints and 115 other complaints): 122 days (131 days for Strike Action complaints, 64 days for Covid-19 complaints and 46 days for other complaints). Regulatory timeframe for Stage 3: 28 days, average case turnaround time for Stage 3 (23 cases): 33 days

Number of complaints escalated to the OIA	24
Number of complaints escalated to OIA that were not justified (benchmarked against the sector)	25

The turnaround time for complaints and appeals is within deadlines for Stage 1 and Stage 2 academic appeals and Stage 3 complaints is only a little above our internal guidelines at 33 days (compared with 28). For Stage 1 Appeals this is an improvement on last year where we were outside the deadlines.

For Stage 2 complaints there are delays in the turnaround times, but the turnaround times are much slower for strike related complaints and slower for Covid-19 complaints compared to other complaints. We can account for the delays for other complaints, which are due to the number of complex cases which require a lengthier investigation, and this continues to be the case from last year.

For strike related complaints the turnaround time is significantly higher than the deadline and this was due to the large volume of complaints, changing in working patterns and resource issues due to Covid-19, as well as a university decision to wait until after the end of teaching and assessments before completing the investigation to ensure that any mitigations in respect of assessments could be considered effectively. Similarly the turnaround time for Covid-19 complaints is higher than the deadline and again this was due to changing in working patterns and resource issues due to Covid-19 as well as a university decision to wait until after the end of teaching and assessments before completing the investigation to ensure that any mitigations in respect of assessments could be considered effectively.

There has been an increase in the number of non-strike complaints (118 compared to 87 in 2018/19), with a 35% increase compared to the 17% increase last year. There has also been a 22% decrease in the number of complaints sent to the OIA this year compared to last year. So, whilst this is still of concern, this drop means we are making strides to reach the median. Given the increase in the number of Stage 2 complaints, this shows that once students have raised a formal complaint, they are less likely to go to the OIA.

The number of complaints that were submitted to the OIA and deemed 'not justified' was fewer than the median for the sector, however no cases were found justified, whereas the band median is 0.5. This demonstrates that although more students go to the OIA than the median for the sector, the OIA has confidence in our processes.

²⁴ 29 cases were reported to the OIA in 2019/20 a further decrease on last year. This is above the median for the number of complaints expected for Kings by the OIA which was 23 last year. The RAG rating is a persona opinion of Head of Student Conduct and Appeals.

²⁵ The benchmark for the sector is 16 and Kings is 13. The RAG rating is a persona opinion of Head of Student Conduct and Appeals.

Condition C3: have published a Student Protection Plan which has been approved by OfS

There are no updates to be reported on relating to the content of the Student Protection Plan.

In line with OfS requirements, the Student Protection Plan is available online at: <https://www.kcl.ac.uk/governancezone/students/student-protection-plan>

It should be noted that the OfS published a consultation on Student Protection Plan on 17th July 2020²⁶. All responses to this consultation were to be submitted by 11th September 2020. We are now awaiting results from this consultation.

²⁶ <https://www.officeforstudents.org.uk/publications/consultation-on-student-protection-directions/>

Appendix 4:**Condition E: Good governance update:**

Throughout 2019/20 there have been no updates to provide in relation to E1, E2, E3 and E5 (see above table for further information).

In relation to E4, the following reportable events have been made to the OfS during 2019/20, that would have affected the accuracy of the information in the provider's entry to the Register:

- Addition of a new validated provision with Inns of Court College of Advocacy following a successful validation event pre-Covid-19

Appendix 5:

Condition F: Information for students

Prior to the pandemic providers were to report to OfS any reportable event that was deemed to fall under OfS guidance as a “reportable event”²⁷. During 2019/20 we reported to the OfS the following “reportable events”:

- 283 programme closures over the next three years, as an outcome from the Portfolio Simplification exercise.
- Relocation of staff and students from four blocks of the King’s Champion Hill residence to alternative residences, following identification of some potential fire safety concerns at Maple block that required further investigation to ascertain the level of any risk and identify any remedial works required.

Covid-19

Due to Covid-19 pandemic, the OfS revised conditions to F1, F3 and F4²⁸ (see below) to aid providers workload during these unprecedented times:

Condition F1: Transparency information

King’s was due to submit in April 2020 the requested information laid out in Section 9 of HERA. However, on 26th March 2020, the OfS advised providers that this requirement to submit the transparency information was suspended due to Covid-19 pandemic.²⁹ Instead, the OfS will draw on data available with HESA to publish a reduced set of transparency information during this unprecedented time. The requirement to publish transparency information in June 2020 was also suspended. Up until this notice of suspension, King’s was on track to provide the requested information by the published deadline.

Conditions F3 and F4: submission of information to OfS and Designated Data Body

On 25th March 2020, the OfS wrote to all providers to note revisions to F3: Provision of information to the OfS and F4: Provision of information to the Designated Data Body³⁰. Within this notice we were advised that the following information was still required to be submitted:

- Annual Financial Return
- Graduate Outcomes Contact Details
- Prevent Monitoring
- Reportable events (see below for further information)
- Unistats Data

²⁷ <https://www.officeforstudents.org.uk/publications/regulatory-advice-16-reportable-events/>

²⁸ <https://www.officeforstudents.org.uk/media/3353f2e8-179a-4fbd-b257-a2951d18868e/f3-f4-notice-new-reporting-requirements-march2020.pdf>

²⁹ <https://www.officeforstudents.org.uk/data-and-analysis/data-collection/transparency-return-2020/>

³⁰ <https://www.officeforstudents.org.uk/media/3353f2e8-179a-4fbd-b257-a2951d18868e/f3-f4-notice-new-reporting-requirements-march2020.pdf>

Further information was then provided on 30th July 2020³¹ reinstating some returns. While some of these returns are not yet due to be returned, assurance can be given that the times outlined by the OfS are on track to be met. Assurance can also be given that those deadlines that have now passed, the data was submitted on time:

- Provider profile was signed off on 9th September 2020
- Unistats data was signed off 13th August 2020

Reportable events during Covid-19

Guidance provided to institutions on 25th March 2020³² noted that “Registered providers are normally required to report to the OfS material events with possible financial viability or sustainability implications. The pandemic creates conditions in which many providers are likely to experience a material change in their financial position and performance that would normally be reportable to the OfS. It is not possible at the moment for providers to identify the long-term impact of the pandemic and so we are removing the general requirement for a provider to report events with implications for viability or sustainability over a three- or five-year horizon”.

Instead, the OfS put in place “a requirement to report short-term financial risk”. This was necessary to the OfS to allow them to identify any provider that may be likely to experience acute financial challenges in the short term. It also allowed the OfS to understand patterns across the sector and the exposure of different types of provider to developing events.

The reportable events that the OfS requested providers to make during the pandemic were:

- Report to the OfS if it was considered to be reasonable likely that its liquidity will drop below 30 days at any point during a rolling three-month period from the date of the report to the OfS. In assessing this liquidity this might include, but is not limited to:
 - A reduction in forecast student recruitment, from UK-based students, EU students, and international students
 - A reduction in forecast income from non-teaching or research activity
 - A reduction in forecast incomes from the provision of accommodation to students
 - An increase in payment of refunds or compensation to students as a result of changes to course delivery, accommodation, or other services.
- Cessation or suspension of delivery of higher education, including the inability to award qualification or credit. Providers were asked to report to OfS any cessation or suspension of delivery of any programmes to current students where reasonably equivalent alternative study options have not been provided. We were required to report where we:
 - No longer delivered higher education to one or more group of students

³¹ https://www.officeforstudents.org.uk/media/8d49fac7-5757-4b9f-9c29-4ce0d95da50d/update_office_for_students_approach_to_regulation_and_information_about_deadlines_for_data_returns.pdf

³² <https://www.officeforstudents.org.uk/media/5b874e9b-5588-4bec-b386-d83d59a20401/covid-19-reportable-events-guidance.pdf>

- Ceased or suspended delivery of one or more modes of study to current students, for example no longer delivering a programme on a part-time basis
- Ceased or suspended delivery of higher education, in whole or in part, to current international students with a visa issued under a Tier 4 licence
- Ceased or suspended delivery of higher education in such a way that current students who expected to complete their programme in the 2019/20 academic year were unable to do so
- Had lost accreditation by a professional, statutory or regulatory body (PSRB) because of changes to the delivery of higher education made as a result of the pandemic.

We did not have to report:

- That we had moved teaching and assessments to an online or other delivery method
 - Had temporarily closed a campus or the provider as a whole, as long as the teaching continued to be delivered.
- The provider was unable to award qualifications or credit for any unit, module or programme
 - The provider decided to transfer students between its teaching sites
 - A provider withdrew offers made to applicants due to start a course in or after April 2020. We were required to report where we longer intended to accept an intake where offers had already been made. However, we did not need to report where:
 - We postponed the planned start date of the programme
 - We transferred offers to an equivalent course due to start in 2020/21.

In light of the above, we did not need to report to OfS any “reportable event” that was put in place during the pandemic. Where any decisions were taken that programmes were not to run in 2020/21, offer holders were offered a place on an equivalent programme.

Appendix 6:

Condition G update: Accountability for fees and funding

Assurance can be given that King's does not charge its students above the fee limit determined by the College's quality rating and its access and participation plan, and complies with the terms and conditions attached to financial support from the OfS and UK Research and Innovation under sections 41(1) and/or 94(2) of HERA.

Annual registration fees

The annual registration fees for OfS, and the QAA (as Designated Quality Body) were paid when requested (OfS was paid 24th June, when the deadline was 15th July, and QAA were paid 29th May, when the deadline was 30th June).

Unlike 2019, there was no issue with paying the Designated Quality Body fee this year, following a revised process of notification put in place by the OfS/QAA. Confirmation of receipt of fee was received by the Associate Director (Quality, Standards and Enhancement) from the Quality Assurance Agency for Higher Education (QAA) on 29th May 2020.

The annual registration fee for HESA (Designated Data Body) has been paid but unfortunately missed the deadline. This was due to a number of issues, including the invoice not having a valid King's email address (so it was not received electronically), the original invoice not having a PO number, and due to Covid-19 and remote working, staff were unable to retrieve and forward the hard copy to finance. Correspondence is now being had with HESA to ensure correct contact details are on record for future communications to ensure this problem doesn't occur again, and finance have added this reminder to their records for next year to ensure payment is paid in sufficient time.

Appendix 7:

New time-limited Condition: Z3: Temporary provisions for sector stability and integrity

In response to Covid-19 pandemic, the OfS introduced a time-limited condition of registration that prohibits:

- The use of ‘conditional unconditional’ offers, where an offer is only unconditional if the applicant makes that university or college their firm choice.
- A university or college making false or misleading statements about other higher education providers in order to discourage prospective or current students from accepting offers or registering with them.

Other unconditional offers to UK students that could materially affect the stability and integrity of the English Higher Education sector could also be found to breach the condition.

Assurance can be given that King’s complies with this new, interim, condition. We refrained from changing any statuses to unconditional within this time-limited period. It should be noted, we make Unconditional *offers* only when the applicant is post-qualified and assessed to be above our offer threshold for that year’s cohort. We will do this for a small number each year.

ⁱ Green: above average; Amber: below average but above lower quartile; Red: below average

ⁱⁱ Green: above average; Amber: below average but above lower quartile; Red: below average

ⁱⁱⁱ Green: 95% and above of reports received; Amber: 75 – 94% reports received; Red: below 75% reports received

^{iv} Green: 100% of new External Examiners received an induction; Amber: 75 – 99% of new External Examiners received an induction; Red: fewer than 75% of new External Examiners received an induction.

^v Green: 100% confirm standards are appropriate or above standard; Amber: 75 – 99% of reports confirm standards are appropriate or above standard; Red: fewer than 75% confirm standards are appropriate or above standard.

^{vi} Green: less than 10% reports had concern on academic standards raised; Amber: 11 – 15% reports had concern on academic standards raised; Red: 16% and above reports had concern on academic standards raised

^{vii} Green: 100% and above of reports confirmed response; Amber: 90 - 99% of reports confirmed response; Red: fewer than 90% of reports confirmed response

^{viii} Green: 95% and above of reports received; Amber: 75 – 94% reports received; Red: below 75% reports received

^{ix} 100% of new External Examiners received an induction; Amber: 75 – 99% of new External Examiners received an induction; Red: fewer than 75% of new External Examiners received an induction

^x Green: 100% confirm standards are appropriate or above standard; Amber: 75 – 99% of reports confirm standards are appropriate or above standard; Red: fewer than 75% confirm standards are appropriate or above standard.

^{xi} Green: less than 10% reports had concern on academic standards raised; Amber: 11 – 15% reports had concern on academic standards raised; Red: 16% and above reports had concern on academic standards raised

^{xii} Green: 100% and above of reports confirmed response; Amber: 90 - 99% of reports confirmed response; Red: fewer than 90% of reports confirmed response

^{xiii} RAG is judged against the timescales in the published regulations

Context and purpose of the Degree Outcomes Statement

The DOS should cover final classifications for graduates on Level 6 courses and must include descriptions of our degree algorithms, the outcomes of any recent review of classification practices and policies, and how they help us protect the value of qualifications we award. It must explain the scope of review activity, and the extent to which external examiners took part or fed into it. One of the purposes of the degree outcomes statement is to look at trends over time, to compare the results for the last academic year (the 2018-19 HESA cohort) with a meaningful range of previous years. We have compared data from 2014/15 to 2018/19.

The degree outcomes statement is a brief, high-level report, setting out:

- what has happened (the 'institutional degree classification profile' section)
- what has changed (for example, where were the major changes to grade distribution), and
- why it has changed (exploring any justification for sudden or unexpected changes to distribution, plus details of any planned internal review).

The degree outcomes statement must be signed off by our governing body. External assurance is recommended. ASSC will be considering whether a Chief External Examiner should be appointed, with one duty being to provide this external scrutiny.

It is recommended that the statement should be between two and three sides of A4, although recognising that this may vary due to the individual nature of your student numbers, mission and governance structures. The College will work to this brief in future iterations of the statement.

It will be published online and publicly available, alongside our academic regulations and policies.

The degree outcomes statement covers the following areas, as recommended by the QAA:

- 1 assessment and marking practices
- 2 institutional degree classification profile
- 3 academic governance
- 4 classification algorithms
- 5 teaching practices and learning resources
- 6 identifying good practice and actions

Whilst it is not mandatory to publish risks and challenges and proposed actions in statements if we wish to consider them internally. The final part of this paper outlines the planned actions to be taken by the College over the coming academic year and will contribute to future iterations of the DOS. Details of the actions have not been included in the externally published document.

Degree Outcome Statement

2014/15 – 2018/19

Undergraduate Student Numbers

King's recruits the highest calibre of students, with many programmes in recent years recruiting in a highly competitive environment. During the period of this document, King's UG students enrolments have increased as follows:

	2014/15	2015/16	2016/17	2017/18	2018/19
Undergraduate student numbers (headcount)	17,610	17,770	18,250	18,925	19,200

Externally accredited programmes

King's has 77 undergraduate programmes accredited and/or registered by a range of external organisations and PSRBs. These include the MB BS (accredited by the General Medical Council), Pharmacy (accredited by the General Pharmaceutical Council), programmes delivered by the Dickson Poon School of Law (Solicitor's Regulatory Authority/Bar Standards Board) and programmes delivered by the Florence Nightingale Faculty of Nursing, Midwifery and Palliative Care (Nursing and Midwifery Council). While these PSRBs do not influence the design of the specific degree algorithm used, they have previously influenced the College's condonement rules for their specific programmes.

Programme approval

All programmes are mapped against the [Framework for higher education qualifications](#) at the point of programme approval. Additionally, programme approval procedures ensure that there is consideration of relevant QAA subject benchmark statements during the development of the programme. Subject benchmarks are also re-visited during the process of programme review. King's makes use of external expertise during the programme approval and review procedures, asking external specialists to review the programme and module documentation to confirm that sector reference points are/continue to be met.

Assessment and Marking Practices

King's marking criteria was revised in 2015/16 following a comprehensive review and discipline-specific marking criteria were also introduced, following feedback from external examiners.

The [College Marking Framework](#) provides guidance to markers on their marking practices and a selection of models to use. Recent developments include:

- clarification on practice where there is discrepancy between 1st and 2nd markers; and
- clarification on practice relating to rubric violations.

External Examiners

King's uses external examiners for all its taught programmes, asking them via their [annual reports](#) to confirm to us the academic standards of our programmes are in line with the sector. King's has participated in Advance HE's external examiner professional development programme and, since 2017/18, 66 staff have attended external examiner training.

Institution Degree Classification Profiles

King's degree classification profile¹ since 2014/15 is as follows:

Academic Year	% 1st	% 1st & 2:1	# 1st	# 1st & 2:1
2014/15	29	85	1,014	2,935
2015/16	32	87	1,091	2,935
2016/17	34	87	1,307	3,363
2017/18	36	87	1,475	3,590
2018/19	34	86	1,475	3,766

In the five years since 2014/15, the classification profile shows a 1% increase in the percentage of good honours awarded. The award of good honours and 1st class degrees is higher than the sector average (10% difference for good honours² and 6% for 1st³), but when we compare our award of good honours and 1st class honours against the average of the Russell Group, in 2018/19 we were on par with our peers for the average for good honours and 1% above the average of our peers for awarding of 1st⁴.

Additional data of awarding of good honours broken down into different categories is as follows:

This profile, split between gender:

Academic Year	% Female 1 st & 2:1	% Male 1 st & 2:1	% Female 1 st	% Male 1 st	Awards headcount	#1 st	#1 st and 2:1
2014/15	84	84	27	32	3,605	1,038	3,016
2015/16	86	86	30	34	3,450	1,099	2,965
2016/17	87	87	33	35	3,858	1,298	3,343
2017/18	87	86	34	38	4,114	1,467	3,574
2018/19	86	84	33	36	4,367	1,467	3,735

Split between white and BME students⁵:

Academic Year	% BME 1st	% BME 1 st and 2:1	% White 1 st	% White 1 st and 2:1	Awards headcount	#1 st	#1 st and 2:1
2014/15	23.9	76.4	31.9	88.3	2,680	774	3,016
2015/16	29.4	82.5	33.7	90.3	2,322	746	2,965
2016/17	29.9	84.3	35.7	90.2	2,541	851	3,343
2017/18	32.9	87.0	38.6	90.8	2,529	917	3,574
2018/19	30.6	84.9	39.3	89.9	2,539	902	3,735

¹ Note this data includes all students, including overseas students.

² Sector average is 76% in 2018/19

³ Sector average is 28% in 2018/19

⁴ In previous two years we were 1-2% above the average; prior to that we were below the Russell Group average.

⁵ Not all students declare this information

And split between student ethnicity⁶:

Academic Year	2014/15		2015/16		2016/17		2017/18		2018/19	
	% 1 st and 2:1	#1 st and 2:1 of total	% 1 st and 2:1	#1 st and 2:1 of total	% 1 st and 2:1	#1 st and 2:1 of total	% 1 st and 2:1	#1 st and 2:1 of total	% 1 st and 2:1	#1 st and 2:1 of total
White	88	1473/1669	90	1340/1484	90	1413/1566	91	1354/1492	90	1,294/1439
Other & mixed	83	172/206	87	175/201	86	200/233	87	192/220	87	241/277
Chinese	82	47/57	92	55/60	87	58/67	89	65/73	96	67/70
Black	58	124/212	68	79/117	79	111/141	75	110/146	75	128/170
Asian Pakistani	88	72/82	83	77/93	87	90/104	88	108/123	91	118/130
Asian Other	70	106/152	77	90/117	71	112/139	85	121/142	79	101/128
Asian Indian	84	215/256	86	168/195	87	196/225	92	217/236	89	188/212
Asian Bangladeshi	78	36/46	85	47/55	83	55/66	92%	89/97	81	91/113

Academic Governance

The College has a three-tier governance system for assessment. Assessment Sub-Boards (ASB), at which external examiners are present, review, discuss, and ratify results and classifications. These boards report into Faculty Assessment Boards (FAB), which oversee all ASB practices. FABs in turn report into the Academic Standards Sub-Committee (ASSC), which oversees the College's assessment process, providing assurance to College Education Committee and Academic Board (and ultimately the College Council) of the university's academic standards, while also considering sector developments relating to assessment and academic standards, and revising or developing assessment policy and practice for the whole institution.

Annual reports are provided to the ASSC on the awarding of good honours, along with annual summaries from external examiner reports. Actions are assigned to any themes identified by external examiners, with Academic Board granting final approval. For example, in the 2018/19 UG external examiner reports concerns were raised about the late submission policy, and this policy is now under consideration by ASSC.

These mechanisms provide assurance that qualifications awarded to students are appropriate, in line with sector practices and sector reference points.

Joint Awards

Where a programme is jointly awarded with a partner institution, mark translation schemes are developed to ensure marking practices align. Regulations are negotiated between the institutions involved, to ensure the academic standards of the programme remain robust. For those countries that do not require external examiner oversight, we negotiate with the partner institution to ensure this oversight is in place.

⁶ Not all students declare their ethnicity

Classification Algorithm

The same degree algorithm has been used over the 11 years King's has used its Degree Awarding Powers (DAP), thus providing assurance that academic standards remain robust and student's degree outcomes are all treated equitably:

Weighting schemes apply and a C-score between 0-100 is calculated by the formula below:

$$\text{C-score} = \frac{\text{the sum of the weighted marks [mark x relevant credit volume x weight]}}{\text{the sum of credit volume x weighting}}$$

For all undergraduate programmes the following weighting is applied to module marks when considering the award of honours:

- the marks for the best 90 credits at level 6 (and/or level 7 where taken) are given a weighting of 5. Condoned fails may not be included in the best 90 credits.
- the marks for any remaining level 6 credits (and/or level 7 where taken) and any level 5 credits will be given a weighting of 3.
- the marks for all level 4 credits will be given a weighting of 1.
- King's makes provision for condonement. A student may be awarded non-transferable credit for a limited number of non-core modules where the student has failed the module but has attained a minimum for condonement as specified in the [programme specification](#).

Following a QAA Institutional Audit, in 2013/14 Assessment Boards' discretion in considering borderline cases was removed, and an automatic upgrade to the higher classification was introduced where the C-score is within two percent of a higher classification boundary (68/58/48) and where at least 60 credits at level 6 (level 7 for Integrated Masters programmes) or above are in a higher classification. This means all students are treated equitably.

In 2013/14 King's revised its re-assessment regulations to align level 5 and 6 resits to level 7 resits. This meant that for failed assessments, two reassessment opportunities are permitted for level 4, and one reassessment opportunity permitted at levels 5, 6 and 7. This change was a result of a review of the credit framework in 2012, along with further consultation in 2013 and brings King's in line with other university reassessment practices.

King's new Education Strategy began in 2017. Part of the strategy relates to a King's UG programme having a transitional, formative first year and to allow flex in a programme of study. To enable this to happen the current degree algorithm requires review to (a) allow students to have a "transitional" first year and (b) to bring our degree algorithm in line with sector practice where the marks obtained for modules taken in the first year do not contribute to the final C-score, and are not used in the degree algorithm. The new degree algorithm will come into existence from the start of academic year 2021/22.

Teaching Practices and Learning Resources

Supporting teaching practices

As a historically research-intensive institution, in recent years we have prioritised teaching excellence and we have made significant changes to the culture surrounding recognition and reward for teaching and learning performance. An important part of this was the establishment of King's Academy which offers a suite of workshops, professional development opportunities and services to support the delivery of effective teaching for student learning and actively encourage our staff to analyse and reflect on their own teaching practice.

In 2013, King's established an education-led route through to professorial level in the promotions schemes for academic staff which has seen continually increasing engagement. In May 2018 this scheme was further developed into the Academic Education Pathway (AEP), providing a full career structure to ensure appropriate recognition, reward and opportunities for advancement for exceptional educator's at King's.

Graduate Teaching Assistants (GTAs) and other PhD students who teach are also supported through centrally provided and faculty-based introductory training days and bespoke workshops. GTAs are encouraged to apply for recognition from the HEA at Associate Fellowship level and supported via introductory sessions and writing workshops. All educators are supported in developing their digital-education skills by our Centre for Technology Enhanced Learning (CTEL), which runs 18 different face-to-face and online courses.

The impact of our increased emphasis on valuing and rewarding teaching can be seen in the year-on-year increase in the number of staff who engage in professional development and workshops. The HESA 2015/16 data showed that 44% of our staff hold teaching qualifications, up from 42% in 2014/15. Our own internal data shows that the number of employees with at least one teaching qualification has risen from 1754 in 2015/16 to 2174 in 2017/18. 73% of academic staff in 2017 staff survey said that they had been supported in accessing training, learning and development. In their December 2018 re-accreditation of King's HEA Recognition scheme, AdvanceHE said: 'King's College London demonstrates a clear institutional commitment to learning and teaching as evidenced by the King's Education Strategy 2017-2022 and the significant recent investment in the creation of the King's Academy'.

Learning resources

Libraries: King's is committed to the provision of an information infrastructure to support excellence in research, learning and teaching and there has been substantial and ongoing investment in this area. There are six libraries covering all campuses and additionally there is a special collections library and an archives reading room which are available to all students, as well as the Gordon Museum. In response to student feedback, opening hours have been extended and standardised; including improved weekend and vacation access and 24/7 access for eleven weeks prior to the summer examinations. The main libraries are open from 8.30am – 1am throughout the year, and two stay open during the Christmas vacation.

King's Foundations: King's Foundations provides support to help international students develop and strengthen the English language skills necessary for successful transition to academic study at King's. King's Foundations provides support around language and study skills development to all students and this supports students in understanding and enhancing their overall academic skills. In-sessional and study skills support programmes are available to students on a first-come first-served basis. Study skills support is aimed at students whose first language is English and in-sessional support is aimed specifically at those who do not have English as their first language. Both programmes support students in adjusting to a new academic and cultural environment.

IT support: King's has invested substantially in its IT infrastructure in recent years and adopted policies and procedures that support it in its accessibility aims, including a Lecture Capture Policy adopted in 2014/15. King's has developed an on-line learning environment: King's E-Learning and Teaching Services (KEATS), a Moodle open source software with added functionality via a number of plugins, including online submission and marking (TurnItIn), e-portfolio system (Mahara), reading lists online (Talis) and Lecture Capture (Echo 360). It includes a variety of activities and resources including forums, wikis, interactive tutorials and quizzes to aid students learning.

Estates: King's continues to invest in enhancements to our estate for the benefit of students. In 2015 the university signed 50-year leases on Bush House Centre Block, Bush House North East Wing & Bush House South East Wing, on Aldwych. Investing approximately £100m, King's worked in partnership with students to co-design and build a high quality, technology rich-space, which now houses staff and students from the King's Business School and a number of other academic departments, as well as state-of-the-art learning and social spaces and enhanced student facilities. Students were central to the design of the learning and teaching spaces in Bush House and in a 2017 survey, 92% of student respondents felt that the teaching spaces in Bush House supported their study and learning activities, and two thirds believed that the learning environment increased their study and learning performance.

The King's Education Strategy 2017 – 2022 makes a commitment to continue investment in formal and informal, innovative, and digitally-enabled learning spaces. In support of this initiative, a £47m investment was approved to develop accommodation for a new department of Engineering, featuring highly innovative teaching and learning spaces and resources. Our teaching and learning spaces are tailored to the disciplines being taught within them. In 2016, a new clinical skills laboratory was opened at our Denmark Hill campus. This £1.3m investment was

based on student feedback that requested more dedicated space for clinical skills practices and simulation. Furthermore, a £20m development is being undertaken with the Clinical Research Facility in Denmark Hill, along with King's Health Partners and the Wellcome Trust.

Improved attainment milestones:

- The supportive learning environment and strategic initiatives impacts continuation rates for students from low participation backgrounds (POLAR Q1)⁷, and we have seen an increase in attainment for all students, but in particular for specific student groups.
- Between 2014/15 and 2016/17, our BME attainment gap for first-class and upper-second class degrees decreased from 11% to 4.9%.
- Further, the good honours attainment from our full-time students from National IMD Q1 and 2 increased from 76.1% in 2012/3 to 81.7% in 2016/17, and the attainment gap between young and mature students decreased from 7.6% to 2.2% in the same period.

Personal tutors: Every UG student is allocated a personal tutor on enrolment and are encouraged to meet them at least once a term. In addition to personal tutors, each Faculty also has a Senior Tutor, who a student can approach if their personal tutor is not available. A personal tutor dashboard has been developed, and training is provided to aid tutors in meeting their students and holding discussions with them. As part of the Education Strategy 2017-2022 a review of the personal tutoring system is being undertaken.

Identifying good practice and actions

The following have been identified as areas of good practice:

- Academic standards are overseen by a robust governance structure, from Faculties through central College e.g. Assessment Sub-boards through to College Council.
- All student awards are calculated using the same degree algorithm.
- Assessment Sub-Boards do not have discretion when determining borderline awards. By automating borderline consideration all students are treated equitably.
- Regulations and policies are reviewed annually to ensure they remain fair and fit-for-purpose.
- Demonstrating excellence in teaching is an essential criterion to all taught academic appointments and promotion.
- Academic Education Pathway: a new full career structure to support excellent educators
- Supportive learning environment, ensuring all students have support during their programme of study.
- At each stage of a programme life cycle (from programme development, approval, review, assessment, final award) external advisers are used.
- External examiners continually write in annual reports the academic standards of our programmes are in line, and often above, those elsewhere in the sector.

This Statement was prepared prior to the Coronavirus pandemic and does not include reference to the impact that it may present on future degree outcomes.

In addition to the workstreams identified in ASSC's schedule of business, the following is a brief outline of developments that will contribute to future iterations of the DOS:

- New degree algorithm designed for introduction in 2021/22 (with King's Business School as early adopters).

- Review of regulations relating to reassessment, condonement, progression rules. There will be no change to automated borderline cases.
- A review of marking models and marking criteria.
- A banded marking pilot.
- A review of the mitigating circumstances process.
- Introduction of e-assessment
- Changes to academic governance re: Assessment Boards. Assessment Boards will become more strategically focused.
- Developing further King's approach to digital education e.g. developing an integrated online learning environment that is simple to use, fostering blended learning etc.
- A new Graduate Teaching Assistants (GTA) framework is being developed, to provide training to our PGR students in relation to learning and teaching.

Acknowledgements

This statement has been produced with the assistance from staff within the Directorate of Students and Education, staff within Strategy, Planning and Analytics, Faculty Assessment Board Chairs, and a working group of the Academic Standards Sub-Committee.

Formal consideration of the statement has been held with the Academic Standards Sub-Committee, College Education Committee, Academic Board, before final approval by College Council.

This Statement was prepared prior to the Coronavirus pandemic and so this version does not include reference to the impact that it may present on future degree outcomes.

King's College Council

Meeting date	24 November 2020
Paper reference	KCC-20-11-24-7.5
Status	Final
Access	Members and senior executives
FOI release	Subject to Redaction
FOI exemption	None, subject to redaction for commercial interest or personal data

Report of the Governance and Nominations Committee

Contents	Meeting at which considered	Consent agenda	Council action
1. Committee Memberships	1 October 2020	Yes	Approve
2. Change to an Ordinance - ESC Annex 1	1 October 2020	Yes	Approve
3. Governor Liability and Indemnification	1 October 2020	Yes	Note
4. Reflections on the Council Away Day	1 October 2020	Yes	Note
5. Academic Board Election Update	1 October 2020	Yes	Note
6. CUC HE Code of Governance	1 October 2020	Yes	Note
7. Council Composition	1 October 2020	Yes	Note

For Approval

1. Committee Memberships

Motion: That Waseem Malik be appointed as Coopted Independent Member, Dr Aleksander Ivetic be appointed as Co-opted Staff Member and Adrian Signell, be appointed as the Student Member of the Audit, Risk and Compliance Committee. All three appointments for an initial term of three years starting with immediate effect.

That Helen Gough and Sanjeev Sharma be appointed as co-opted independent members of the Estates Strategy Committee. Both appointments for an initial term of three years starting with immediate effect.

A thorough recruitment process had been undertaken for the independent member vacancies with assistance from King's in-house executive search team. Dr Ivetic and Mr Signell were recruited through a university-wide nominations process.

Mr Malik is a chartered accountant, who trained with PwC before taking a number of senior roles in the financial services industry, including eight years as Chief Finance Officer at AXA Insurance. He is currently the Executive Managing Director for Claims at AXA Insurance and is also a Non-Executive Board Director of Thatcham Research, where he chairs their Audit Committee, and a Non-Executive Board Director of the Insurance Fraud Bureau. Mr Malik graduated from UCL in Economics.

Dr Ivetic is a Senior Lecturer from the Faculty of Life Sciences and Medicine with a wide-ranging understanding of the university, the HE sector in general and the external and political

environment in which the university operates. He has held research positions at the National Institute for Medical Research (now part of the Crick Institute), Imperial College London, and the Wellcome Trust. He is Postgraduate Research Lead to approximately 100 PhD/MD students within the school of Cardiovascular Sciences and Medicine.

Mr Signall is enrolled in a PhD programme in Virology and Genomics having completed his BSc Biomedical Science at King's in 2018. He has worked as a Clinical Scientist at the GSTT NHS Foundation and as a Laboratory Assistant at Aleris Medilab in Sweden.

Ms Gough is a Chartered Surveyor and real estate professional who has been Head of Project and Development Services for the UK and Ireland for Jones Lang LaSalle Limited (JLL). The firm is well known in higher education having been involved with a number of universities, and at King's *through its work for Kato Kagaku on Bush House*.

Mr Sharma is Chief Property Portfolio Officer of M&G Real Estate Limited, one of the world's largest property investors with £33.7b of assets across all the major sectors in the UK, Europe and Asia. He has also been a member of the M&G Real Estate Board since 2001.

In considering the two recruitment and selection processes for the staff and student members of ARCC, members noted that applicant numbers had been small. It considered the visibility of Council and its Committees for internal members of the College and ways in which this might be enhanced. It was suggested that improvements to the visibility of the Council webpages and an integrated information program about Council itself would be helpful, perhaps incorporating profiles of independent members.

2. Change to an Ordinance - Estates Strategy Committee Membership

Motion: That the Ordinances be amended as set out in **Annex 1** to include a student in the membership of the Estates Strategy Committee.

The Committee agreed with the suggestion of the Chair of ESC that a student member should be added to the Estates Strategy Committee in the same way that has been established for the Audit, Risk and Compliance Committee and the Finance Committee. This proposal requires a change to the terms of reference which have the status of an Ordinance. As such, and in accordance with the Ordinance requirements, notice of the proposal has been circulated in writing to Council Members 14 days ahead of the decision to approve being taken.

The proposed change to the Ordinance is shown in track change in Annex 1.

For Note

3. Governor Liability and Indemnification

The Committee considered a mapping of the way in which Members obligations as governors are being met through the governing structures and university policies using the summary of the full range of Council responsibilities commissioned from Browne Jacobson and considered at the last meeting.

Members considered the way in which governor remuneration might affect perceptions of liability and responsibility, noting that some other universities had introduced this. The Principal reported that there did not appear to have been any change in terms of commitment to the governor role in Australia where governor remuneration had now been uniformly introduced. There was no proposal to introduce remuneration for Governors at King's and members agreed that they did not want to pursue this at the present time for independent members. However, it was noted that student member remuneration for elected students who were not paid might be considered to

address issues of widening participation.

The College Secretary would review the document to be sure all areas of liability were addressed before the document was shared with all members of Council, likely at the January meeting.

4. Reflections on the Council Away Day

The Committee considered the Council Away Day held on 23 September 2020 online using MS Teams. Many positive comments had been received from the participants, noting that the format had worked well and it had been successful in maintaining a strategic focus rather than discussing the contemporary crisis.

The opening talk from Professor Toope had opened the discussion on horizons and the Executive Deans had provided the frank and open insight sought by members. The degree of interconnection between the Deans and their call for more interdisciplinary and community and industry facing provision had been remarkable. It would be important to consider the aspects to take forward for the next phase of strategic discussion and planning.

The Secretariat would circulate notes of the Away Day for reference.

The Committee would consider the shape of the next iteration of strategic discussion in the light of the notes at its next meeting.

5. Academic Board Election Update

Elections had been held for the vacant posts in the Faculty of Arts and Humanities, as noted at the previous meeting, and candidates successfully elected. Two elected staff seats had become vacant following staff resignations and elections would now be held to fill those positions. The elections for the nine faculty student seats were run by KCLSU and were announced on 14 October.

6. CUC HE Code of Governance

The Committee considered the revised Higher Education (HE) Code of Governance 2020 issued by the Committee of University Chairs. The revised version focused on principles more than process and emphasized the responsibility of governing bodies to oversee an effective organisational and board culture based on mutual respect, constructive challenge and informed and transparent debate.

Members raised the following points in discussion:

- The need for regular and timely information underlining the importance of the Balanced Scorecard.
- The need to find ways to better engage different parts of the community to improve diversity and inclusion.
- The need to be sure that Council is confident in its assurance of the quality of academic standards – highlighting the reports from Academic Board and the process assurance report from Audit, Risk and Compliance Committee.
- The need to ensure that the briefing meetings for independent members are clearly briefing-only and that Council and its Committees make any decisions with the appropriate staff and student members present.

7 Council Composition

The Committee considered a letter sent from a group of staff and students ("KCL is Democratic") to Council concerning the proportion of elected staff members of Council and suggesting that all members of Council be elected by King's staff and students.

The Principal reported that a highly elected model was not common elsewhere in the UK beyond Oxford and Cambridge. He noted that universities were not owned by their staff and students but rather were creations of the state or benevolent founders and required independent accountability. Thus it was entirely appropriate that there be a predominance of independent members in their membership. Staff governing staff was not good governance. There was a need for staff input that was effective and he proposed that Council acknowledge this and establish a forum, perhaps at Academic Board, led by the three elected staff members of Council to discuss their input into Council and how it works. He believed that the majority of the university community valued the contributions made by the independent members.

A staff member reported that sight of the way in which Council operates revealed the care taken by independent members and the genuine concern they had for the College's welfare and that communication of this to staff and students would be important.

It was agreed that wider communications and discussion with the group would be helpful to understand what the issues of concern are, to explain misunderstandings and to discuss how best to resolve them. The Principal stated that he was happy to facilitate a discussion at Academic Board. That discussion would include staff and students and it would be useful to consider the balance of student voices as well as staff.

Lord Geidt
Chair Governance and Nominations Committee
November 2020

Terms of Reference

1. Authority

The Estates Strategy Committee reports to the Council on the development and management of the College's property assets in support of the College's Strategic Plan. In conjunction with the Finance Committee, it makes recommendations to Council on any proposals for the acquisition or disposal of any part of the College's estate involving an aggregate financial commitment in excess of £5 million. This includes incurring or disposing of leases with aggregate rental liabilities over the lease term expected to be in excess of £5 million. It will also make such recommendations on any leases involving an annual rental liability in excess of £500,000 irrespective of the aggregate liability over the term. The Committee also has oversight of all major estates works exceeding £5 million in value.

2. Duties

In carrying out its responsibilities the Committee:

- 2.1 Leads in the formulation of, and keeps under review, the estates strategy for the development and maintenance of the property assets of the College, including receiving at agreed intervals:
 - Reports on the existing use and market value of the Estate;
 - Report on the condition of the Estate;
 - Reports on the performance and utilisation of the Estate against the College's Strategic Objectives;
- 2.2 Recommends to Council, in conjunction with the Finance Committee, the College's annual Capital Investment Plan and receives regular reports from the Director of Estates and Facilities on progress;
- 2.3 Causes the preparation and maintenance of appropriate asset records;
- 2.4 Receives reports as appropriate from the Senior Management Team; and
- 2.5 Other related matters.

3. Composition

3.1 The Committee shall comprise:

- 3.1.1 An Independent Member of the Council (in the chair)
- 3.1.2 At least one other Independent Member of the Council or Independent Co-opted Member to be Vice-Chair.
- 3.1.3 The Principal & President
- 3.1.4 Other Independent Member(s) of the Council
- 3.1.5 Other Independent Co-opted Members
- 3.1.6 Senior Vice President/Provost (Arts & Sciences)
- 3.1.7 Senior Vice President /Provost (Health)
- 3.1.8 Senior Vice-President (Operations)
- 3.1.9 Vice President (Finance /Chief Finance Officer
- 3.1.10 Director of Estates and Facilities
- 3.1.11 One Student Member

3.2 Independent and student members appointed to the Committee by the Council on the recommendation of the Governance & Nominations Committee shall normally serve a

maximum of two consecutive three-year terms, with the possibility of extension for a further single three-year term (up to a maximum of nine years) in exceptional circumstances.

- 3.3 The following College Officers shall attend meetings of the Estates Strategy Committee as necessary:

3.1.1 Acting Director Operations (Central)

- 3.4 The College Secretary or his/her designate shall act as Secretary to the Estates Strategy Committee.

4. Frequency of Meetings

4.1 Meetings shall normally be held four times a year.

4.2 The business of the Committee may be conducted by electronic voting or email in accordance with Ordinance B9.

5. Reporting Procedures

A report of each meeting of the Committee will be circulated to all members of College Council.

These pages have been redacted

King's College Council	
Meeting date	24 November 2020
Paper reference	KCC-20-11-24-08
Status	Final
Access	Subject to redaction
FOI exemptions	None, subject to redaction for commercial interest or personal data



KCLSU President's Update

Action required

- ☐ For approval
☒ For discussion
☐ To note

Executive summary

The King's College London Students' Union (KCLSU) sabbatical officers are elected students who have the opportunity and platform to enact changes, which they felt was needed after their own experiences as students. They sit on various high level KCL committees to provide a student voice and perspective on a number of critical issues which will affect the wider student body. They are also Trustees of KCLSU, a charitable company limited by guarantee and ensure that charitable aims of the charity are delivered in line with the interests of the student body.

Sabbatical officer's objectives are identified based upon their experiences but also the constantly changing needs of students. There are a broad range of priorities which can be summarised into broad categories, as outlined below, however a more in-depth view into objectives for the year is available in **Annex 1**.

This year's sabbatical officers have had the need to balance their manifesto obligations against the challenges posed by COVID. It is essential that these issues are given a platform at KCL as to ensure that the student voice is taken into account during this unprecedented and uncertain times.

The 20-21 Officer Team:

President – Salma Hussain (SHH)

VP Activities and Development: Niall Berry (NB)

VP Education (Arts and Sciences) – Vatsav Soni (VS)

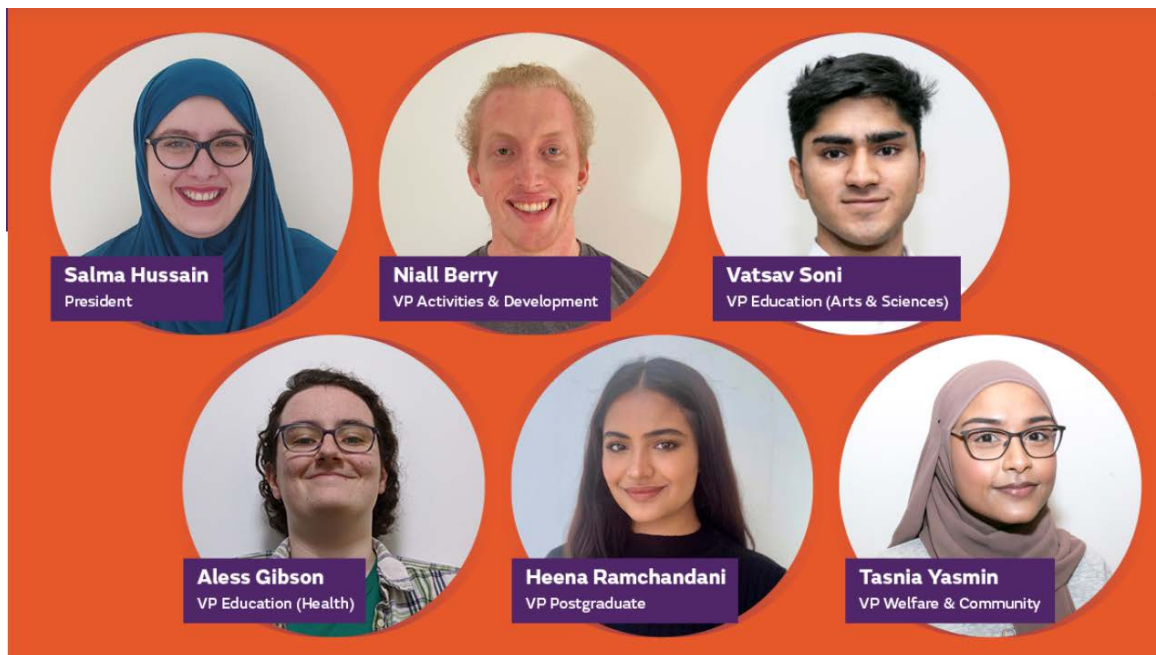
VP Education (Health) – Aless Gibson (AG)

VP Postgraduate – Heena Ramchandani (HR)

VP Community and Welfare – Tasnia Yasmin (TY)

'Education Officers' refers to the sabbatical officers whose remit is education based and includes

VP Education (Arts and Sciences); VP Education (Health) and VP Postgraduate (ie Vatsav, Aless and Heena)



KCLSU President's Update

The student experience is an evolving entity, which has led to evolution in the priorities of the KCLSU sabbatical officers to ensure that objectives are in line with the needs of students. The unique challenge of the COVID-19 pandemic further strengthens the need of the student voice to be heard and recognised. This has led to the development of identification of key strategic areas to be worked upon over the course of this academic year, a summary of which is listed below and an expansion in **Annex 1**. The student experience includes academic study but also the non-academic areas which students participate in.

Key Areas of Strategic Focus:

Assessment and Feedback: Small but effective changes in the administration of assessments would improve the student understanding and subsequent scoring. These changes include early access to past papers, precise marking rubrics and models answers which, combined, will allow the student to achieve the highest mark possible. Moreover, by facilitating cross-year group interactions, peer support can help students to understand what is required of them.

Student Representation: As the largest stakeholders in universities, the student voice and perspective should be considered in every decision made. Student representation should not be tokenistic but should be an avenue to explore new ideas and lead to an improvement in both teaching and research. This representation should be at all levels of governance so that policy changes can account for the needs of our diverse student body.

Upskilling students: Students pay for a university education however the university experience is much more than that. Students should be able to leave university with both a world class education but also the ability to find a suitable career; employability prospects may be improved through developing key transferable skills such as financial literacy. Participation in student activity groups within KCLSU provides many transferrable skills and we need to ensure we are celebrating these skills for example by increasing visibility of student media groups for example by playing KCLSU radio in KCLSU spaces. Furthermore, career development opportunities and the ability to meet employers, are particularly important for postgraduate students. Improving these areas are key to produce graduates who are able to effectively transition into the workplace.

Inclusion: The King's community is diverse and has corresponding diverse needs. Inclusion needs to be considered in both governance and within our spaces by including those from marginalised communities. Governance is a key area where student voice can champion inclusion, by increasing student representation at all levels, the needs of individual students can be considered and accounted for. Furthermore, the current Eurocentric curriculum is not reflective of our diverse student body therefore needs to be decolonised and internationalised, this may also improve the satisfaction scores in the NSS of BME students.

COVID-19: All of the strategic areas of importance are affected by the current coronavirus pandemic. This pandemic has led to large changes to every student's life and officers need to be mindful of how these changes can affect the academic experience. Including and considering all voices in decision making and policy changes is key to ensure that impact of the pandemic on student experience is mitigated as far as possible. In light of COVID-19, there needs to be a review of hardship funding for students to ensure that they are properly supported.

Finances: Money has and always be a difficult topic to approach. Students should feel empowered to be able to understand their own finances, perhaps through peer support mechanisms, but also be able to easily access bursaries that they are entitled to. Tuition fees, particularly for postgraduate international students, are an incredibly high burden which is why there is need for a third instalment to allow students to have flexibility in paying fees when they are in need. The use of these tuition fees by the university needs to be clarified so students are aware where money from tuition fees is used, this will also allow greater appreciation of the many services that KCL offers, aside from the academic experience. KCLSU also needs to evaluate approach to transparency of activity group funding to make it clearer to students the rationale behind amount of money given to societies.

Wellbeing: The individualistic nature of wellbeing requires a tailored approach. This has been approached by officers in different ways. Faculties need to consider how wellbeing support can be offered on a localised level which is more specific and tailored to their students who may have differing needs to students of other faculties. Furthermore, KCLSU societies provide a form of community support however are not formally equipped for this which is why it is important to evaluate how to support these societies best perhaps by implementing a mandatory role of a wellbeing officer for each student group.

Miss Salma Hussain, Mr Niall Berry, Mr Vatsav Soni, Miss Aless Gibson, Miss Heena Ramchandani, Miss Tasnia Yasmin
1 November 2020

KCLSU Officers’ Reports

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Summary

This report is broken down into two sections, section 1 highlights the collective projects that the officers agreed to take on in light of issues that have emerged due to COVID-19 as well as a need to respond to government changes that impact on KCLSU members. Section 2, highlights the campaigns of the each of the sabbatical officers, which stems from their manifestos.

The method for depicting progress is done on an academic year and broken down in to 3 terms, (term 1, 2 and 3), the status section indicates if the campaign or project is on track.

Each of the projects will contain the initials of the sabbatical officers as listed below:

President – Salma Hussain (SHH)

VP Activities and Development: Niall Berry (NB)

VP Education (Arts and Sciences) – Vatsav Soni (VS)

VP Education (Health) – Aless Gibson (AG)

VP Postgraduate – Heena Ramchandani (HR)

VP Community and Welfare – Tasnia Yasmin (TY)

‘Education Officers’ refers to the sabbatical officers whose remit is education based and includes both VP Education (Arts and Sciences); VP Education (Health) and VP Postgraduate

Diagram 1: Keys

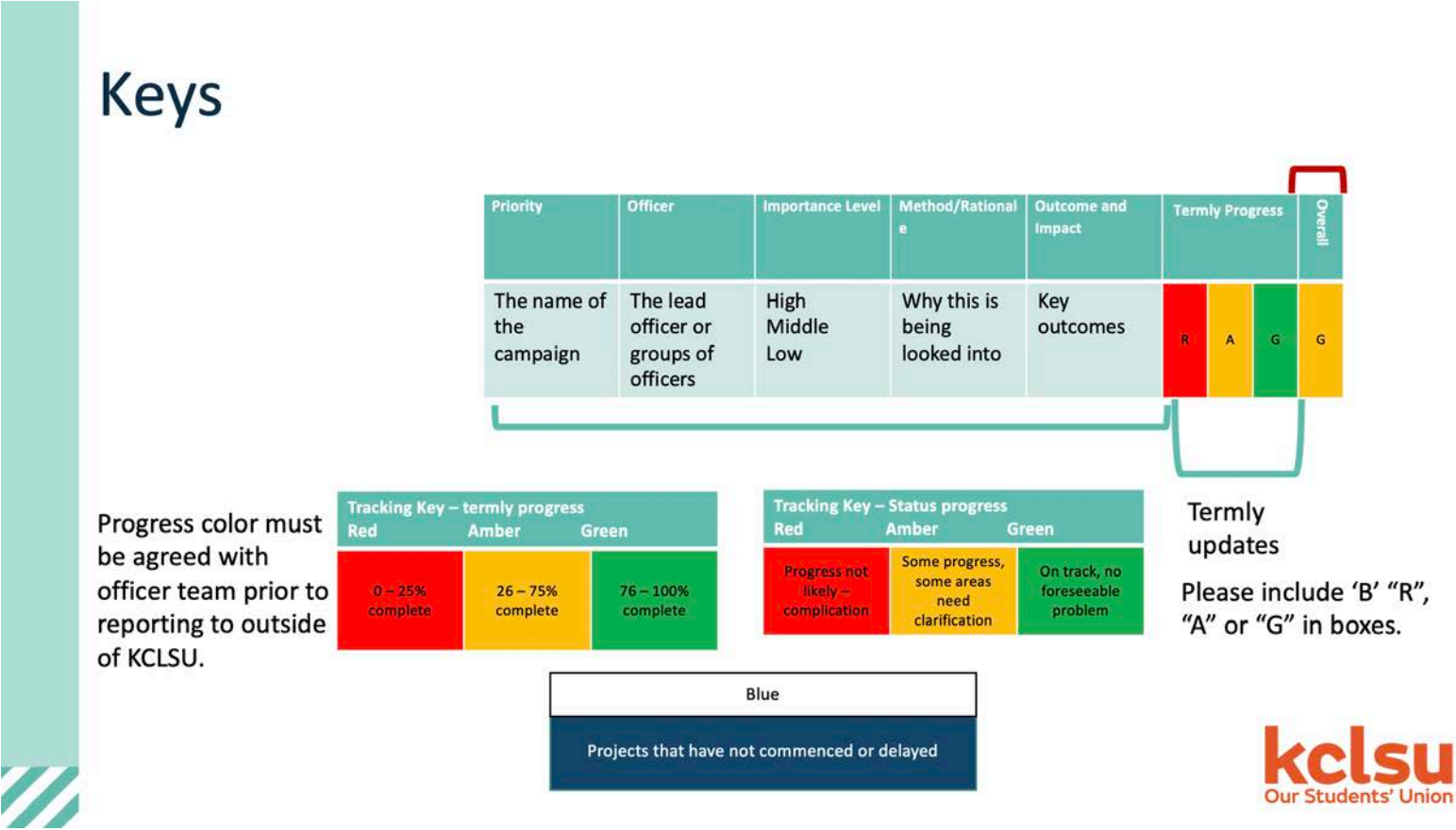


Figure 1: depicts the progress on each of the objective and clarifies the meaning of each colour and column

Section 1: Collective Projects

The projects listed in Table 1 have been identified as areas of priorities by multiple officers upon assumption of office. Upon review of the Relationship Agreement, these priorities may become joint KCL and KCLSU projects.

Projects listed in table 1 have been identified since the officers have come into position and will be worked on as a collective. After the Relationship Agreement has been reviewed these priorities may appear as joint KCL and KCLSU projects.

Table 1: Collective Officer Projects

Priority	Officer Lead	Importance Level	Method/Rationale	Outcome and Impact	T1	T2	T3	Status
Equality, Diversity and Inclusion (EDI)	All	High	This is a year of action. We need to evaluate at how we are representing students throughout our community and how we can consider EDI in this. The murder of George Floyd highlighted the stark realities that members of different races experience, predominantly our Black students and staff. The negative experiences of these students at King's was reflected in data derived from the NSS, where Black students experienced 11.1% decrease in satisfaction. There needs to be an exploration into why our students are experiencing this growing dissatisfaction and implement tangible actions to prevent this negative experience of our students being repeated.	Ensure that every voice is heard and accommodated in the face of difficulties that covid-19 poses. Ensure that progress on EDI is not halted due to covid-19. This is a business critical issue which cannot afford to be delayed.	R			R

			<p>There needs to be action to tackle inequalities, wherever they exist, particularly this year when these inequalities may be exacerbated. White working class males are the least likely demographic to progress to higher education and we need to ensure students who identify as such are supported. Otherwise there will be disproportionate dropout rates but also reductions in progress made in combating attainment gaps. The move to online teaching and examinations may adversely affect students from lower socio-economic backgrounds who live in digital poverty.</p> <p>Accommodations for these students needs to be made centrally through consideration of the diverse needs of our student population in policy creation. Equality, Diversity and Inclusion should be central to every policy decision rather than as a tickbox exercise in the final steps of approving a policy.</p> <p>There are resource implications to consider and decisions need to be made on what is most important this year. However, this is a key strategic area which requires progress.</p>	<p>Allow all students to be on equal footing when studying and being assessed to prevent the increase in attainment gaps. This may be achieved through a review of prioritisation in allocation of library and informal study spaces.</p>				
Wellbeing	Tasnia and Niall	High	The wellbeing of students is critical. There is no luxury of complacency this year.	The impact of this priority will be ensuring that every student feels	A			A

			<p>The impact of self isolation and lack of F2F teaching has a large negative impact upon wellbeing of students. Being trapped in small rooms in halls of residences or unsafe family homes rather than spending time on campus can be mentally damaging to many students. A recent study by O'Connor et al, published in the British Journal of Psychiatry, found that the prevalence of suicidal thoughts increased in the first lockdown, particularly in young adults between the ages of 18-29, with a significant proportion of our student population falling within this age range, it is integral to ensure our students are supported and do not slip through the cracks.</p> <p>The increased probability of students dropping out this year due to poor wellbeing is an issue that needs tackling. This poor wellbeing could be mental, physical, financial or even a combination of all three and therefore mitigations need to be put in place to ensure that King's fulfils the duty of care towards its students.</p> <p>We are currently reviewing activity group activity in a digital world to ensure students can still integrate and interact with the King's community. This will combat</p>	<p>supported to face the unique challenges of this year. The subsequent outcome would be preventing astronomical dropout rates but also fulfilling the wider duty of care KCL has to students in ensuring good mental wellbeing.</p> <p>The WonkHe survey data can be used towards creating a strategy of tangible actions to ensure no member of our diverse community is left behind.</p>				
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			<p>feelings of loneliness and subsequent potential drop out rates.</p> <p>KCLSU have participated in a national survey, run by WonkHE, which examines loneliness in the context of putative drop out rates. Upon publication of results we will be able to compare data from KCL students against a national picture.</p>				
NSS and Academic Quality	Education Officers and President	High	<p>The move to blended learning is a huge upheaval to modern university education and therefore is a threat to the academic experience, a large part of the overall student experience. This transition will have successes and pitfalls which requires monitoring of constant feedback to ensure the high standards of academic quality that King's provides is achieved.</p> <p>The National Student Survey (NSS) is a snapshot of the culmination of experiences of final year students and therefore may not necessarily be reflective of the wider student experience. Furthermore, at the time of data collection, the actions arising from NSS data cannot be used to make change for the students the data is collected from. These reasons, amongst others, provide context for the need to review the NSS meanwhile other robust methods of data collection need to be undertaken to ensure academic</p>	<p>Maintenance of academic quality in a blended learning environment through continual use of student feedback in a way that is equitable to both staff and students.</p> <p>Ensure student voices are heard when evaluating the successes and failures in the transition to online learning so improvements can be made to teaching.</p>	R		A

			<p>quality is maintained. Alternatives may include module evaluations, which provide more detailed feedback on module quality to allow iteration and improvements. I recognise that module evaluations are an imperfect measure as there is disproportionate negative feedback towards academic staff who identify as female or originate from BME backgrounds. Therefore, we believe that these evaluations should not feature in Personal Development Reviews as they may have adverse long term implications on career progression and that other feedback methods should be considered.</p> <p>Module evaluations and the NSS occur too late for tangible actions to be drawn and acted upon. We are committed to exploring various other feedback options with the university to ensure that academic standards are maintained.</p>	Increased student satisfaction as students will see their immediate feedback is acted upon.				
Value for Money	Salma, Vatsav, Tasnia and Heena	High	<p>Covid-19 has had a dramatic impact on the finances of all students. There are four key areas which require consideration.</p> <p>Firstly, bursaries and scholarships for students in hardship whether these be for tuition fees or the high living costs of being based in London. The wide ranging impact of covid-19 has been felt by students</p>	Students will be supported when they find themselves in circumstances of hardship. Hardship is not uncommon in a normal year however this is	R			A

			<p>in differing ways from depreciating currencies of international students by as much as 20%, increasing the tuition fee burden, or the loss of part time work which was once relied upon to afford the high cost of living in London.</p> <p>Secondly, the age old argument of the third instalment. Allowing students to pay tuition fees flexibly, over a longer time period, will ease the burden of tuition fees and positively impact the wellbeing of students who are required to raise funds in order to study. The largest group who would be positively impacted by this would be international postgraduate students, and this may make King's a more attractive employment prospect.</p> <p>Thirdly, thinking about next steps after graduating from King's. The prospects for our 2020 and 2021 graduates are dire. This may lead to increased progression to postgraduate courses and highlights the increased both need and demand for the 10% alumni discount. We are looking forward to working with key stakeholder to ensure students are aware of the benefits of staying with KCL for postgraduate study.</p>	<p>especially important this year due to the impact of covid-19.</p> <p>Students will be able to access a third instalment and pay fees more flexibly. This will also positively impact the wellbeing of students as the stress of having to find money to pay tuition by the January deadline will decrease.</p> <p>Graduates of KCL may be retained for postgraduate study therefore generating increased income for KCL but also loyalty to the institution.</p> <p>Provide greater clarity to students on the current state of Higher Education</p>				
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			<p>The move to online teaching has led to national cries for tuition fee refunds. The current state of governmental funding in higher education means that tuition fee refunds are impossible. Therefore, we hope to work with the university to improve financial transparency to ensure students are aware of where their money is going.</p>	<p>sector funding but also clarify where and how tuition fee income is spent. This may reduce calls for tuition fee refunds.</p>				
F2F teaching, Timetabling and the student experience	All	High	<p>Face to Face Teaching (F2F) is ostensibly a challenge. In order to comply with safety regulations of social distancing, room capacity to teach has been reduced significantly which has led to a transition to online teaching. The national picture of calls for tuition fee refunds due to a lack of confidence in value for money with this reduction in F2F teaching. The SU is aware this conflicts with data on campus footfall, therefore demanding robust data collection to investigate the root cause of this disharmony, a strong possibility being a lack of awareness or little point seen in exposing to the risk of the virus, through travel, for very little F2F teaching.</p> <p>We have already worked, successfully, with the university to reinstate protection for Wednesday afternoons in Semester 2, a big win for student wellbeing, and the KCL Senior Management Team agreed to subsidise the increased expenditure in</p>	<p>Increase student satisfaction that the student experience provides value for money.</p> <p>Maintain student wellbeing so that they are to experience both the educational and social parts of the overall student experience.</p>	A			A

			<p>order to maintaining a commitment to 3 hours of F2F teaching. This was a great win for the union but also for a university committed to maintenance of positive wellbeing. The next step is to evaluate how the broader social experience can be maintained through other activities, including our venues in light of a blended learning experience.</p>					
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Section 2: Officer Projects

Table 2 indicates priorities identified by individual officers identified either in their manifestos they were elected upon or discovered the importance of upon starting their role.

Table 2: Officer Projects

Priority	Officer	Importance Level	Method/Rationale	Outcome and Impact	T1	T2	T3	Status
Financial Literacy	SHH	High	71% of students worry about making ends meet and 81% have money worries caused by the pandemic, according to the 2020 Student Money Survey, commissioned by "Save the Student". Furthermore, a 2016 conducted by Richardson et al found that, in a national cohort of students, greater financial difficulties is predictive of greater depression, anxiety, alcohol dependence and global decrease in mental health over time. Therefore, lack of financial education can affect all facets of the student,	By partnering with key stakeholders throughout the university, an increased financial education provision would improve the whole student experience. The following are just a limited selection of how the student experience would be improved as a result of financial education implementation 1. Improved mental health and wellbeing of students: Data shows that the inability of students to budget leads to a global mental health decrease, therefore providing students with these skills allows an increase in wellbeing.	A			G

			<p>particularly the academic, experience.</p> <p>Financial education can come through different workstreams, by working with a number of departments throughout King's from the Students & Education Money & Advice Team to Widening Participation, KCLSU and KCL can provide a robust financial education to all students.</p>	<p>2. Careers and employability: Students with financial knowledge are more employable and will transition better to the workplace</p> <p>3. Academic study: Enabling students to be able to budget better, decreases the need for part time formal work and therefore are able to spend greater time on their studies.</p>				
Formalised Peer Support Schemes	SHH	Medium	<p>Transition to university life is daunting. Students need to be properly supported throughout this transition and one method is through utilising students who have already faced these challenges and have succeeded. In the School of Biosciences, there is a formalised Peer Assisted Learning (PAL) Scheme which conducts small group workshops for all undergraduate year groups to develop different skills. These skills are ones which are required by university study, but</p>	<p>These schemes would allow an increase in student attainment, by equipping students with the skills that they need to succeed academically and socially. The sense of community fostered through these workshops is invaluable and supports student wellbeing especially in being able to point students to parts of King's which they may be unaware of.</p> <p>The ideal outcome of this priority, this year, would be to implement a Peer Assisted Learning Scheme in a Faculty</p>	B			R

			<p>are not necessarily taught formally, including study skills but also how to present effectively by students who are accomplished in these areas. After serving two years as PAL President in the School of Biosciences, I saw remarkable changes and improvements in students who attend these workshops.</p> <p>Furthermore, these workshops allow an improvement in community and wellbeing. These workshops facilitate the formation of cross and intra year friendship but also a sense of community within the faculty and school the students belong to.</p>	other than Life Sciences and Medicine. Ideally, within a scheme within both a Health and an Arts & Sciences Faculty.				
Mitigating the effect of covid-19 on student experience	SHH	High	<p>Covid-19 has an undeniable, large impact on the student experience. The move to blended learning, combined with the constant tuition fees, is leading to dissatisfaction with the student experience. There have been a number of changes to</p>	<p>The impact and outcome of this objective will be the culmination of efforts of all officers this year. The reactive nature of this objective leads to a need to respond to any and all actions needed to mitigate the effects of covid-19 and therefore cannot be</p>	A			G

			the academic experience ranging from a change to the academic day to assessment formats. These changes are challenging to a cohort of students who are already experiencing an abnormal university year; therefore, it is integral that the needs of students are championed.	simplified into a tangible outcome. However, an example of a successful outcome would be the protection of Wednesday afternoons in semester two, after a consultation with the Students and Education Directorate.				
Improved Funding Transparency for Activity Groups	NB	Medium	Activity groups receive funding from the SU for various events. I intend to make this process and the reasoning for allocation of funding clearer, to improve transparency for our members.	Outcome of this is improved funding transparency within the SU, therefore improve governance, accountability and openness with our members.	R			A
Accessibility Grant Funding	NB	Medium	To improve the inclusivity of student activity groups I intend to work on setting up a new grant fund for student activity groups to purchase any adaptive equipment that will allow them to improve accessibility to their sport or activity.	Impact of this priority is the improvement of inclusivity and accessibility within the SU, improving the overall community of KCLSU.	R			A

Support for Student Media	NB	Medium	Supporting student media by organising workshops and support sessions, promoting media through SU channels (i.e. playing KCLSU radio in KCLSU spaces) and other methods to improve relations between the SU and the student media groups.	Student media gives King's students the opportunity to hold the university and SU accountable and the outcome of this priority is furthering the voice of students.	B		A
Activity Group Level Wellbeing Provision	NB	High	With so many of our members being involved in student activity groups they provide an excellent, pre-existing support network to support our members wellbeing. Many activity groups have already elected or nominated wellbeing leads who're working closely with the KCLSU wellbeing team. I intend to work with the wellbeing team and the student wellbeing leads to develop this role and the wellbeing support provided by KCLSU activity groups.	The result of this would be improving wellbeing support for SU members, which is of huge benefit to all students at King's.	A		G
Assessment and Feedback	VS	High	The College's existing approach to assessment design and delivery does not promptly communicate to	By making these resources accessible, students are enabled to engage in self-directed learning. Students are able to	A		A

			<p>students what is expected of them in the assessment. Students are tested on their ability to apply academic content and their ability to understand the assessment design. In an 'Assessment for Learning' program the latter cannot adequately be justified as a learning outcome.</p> <p>Accordingly, to substitute the existing practices and to help students score better by simply understanding what is expected of them in their assessments I am proposing the following adoptions;</p> <ol style="list-style-type: none"> 1. Early access to Past Papers across all modules and where applicable access to past questions answers/answering guidelines. 2. Access to legible and precise marking schemes that enable students to understand what constitutes a 1st class mark or what constitutes a 2:1 or 2:2 mark. 3. Provide access to model answers that enable students to apply and 	<p>rely on these resources and understand what is expected of them in their assessments. Furthermore, students are able to reflect on their past performance, and through the use of these resources are able to understand what they can do to improve their academic performance.</p> <p>Specific Outcomes and Impacts;</p> <ol style="list-style-type: none"> 1. Early access to Past Papers: This allows for students to map how their academic content ties in with the assessment structures and design for their modules. 2. Access to Past Question's answers/answering guidelines; Students are able to track their progress and/or reassure themselves in their revision process. Additionally, students aren't stifled by questions whose answers they do not know. 3. Marking Schemes and Model Answers; Students are aware of the general characteristics and dos and don'ts for each marking bracket. Additionally, students are also able to understand how 				
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			understand the marking schemes. This has the added benefit of showing students what a 1 st class or a 2:1 or 2:2 answer looks like.	they can best approach different assessment structures.				
Late Submission Cap	VS	High	The university's existing policy on late submission specifies that assessments submitted after the set deadline results in the student's mark being capped at the pass mark (40% UG, 50% PG). Students have long expressed frustration for this needlessly strict policy. With digital assessments being the standard practice this year it is now more crucial than ever to address these concerns. To this end, I intend on working with the Late Submission Working Group under ASSC to bring about a policy change that is in line with the assessment for learning approach.	Increased student satisfaction: by implementing this one policy change the assessment design is made less rigid and more appealing to students. An added benefit of this could be seen in student engagement with assessments. Making the deadline less rigid and stringent for students could also result in fewer MCF submissions however this would require more analysis to confirm the same. Furthermore, from an assessment for learning perspective through this policy change we emphasise to students what the true learning outcome is. That is to say, now students are rightly assessed on their ability to apply the academic content they learn as opposed to their ability to meet deadlines.	A			A
University Governance	VS	Medium	The existing governance structure at the university stems from the College Council which subsequently delegates decision making to several	The key outcome/impact is that students find that the college is an inclusive community where students and academics actively engage in decision making.	B			G

and Transparency			committees. Simultaneously decision making is also delegated to individual faculties. In all these different committees, students are usually only represented by their KCLSU Student Officers. More often than not the Student Representatives are outnumbered by their Academic and Professional Service peers at the university. While their increased membership at these committees is rather obvious and understandable there is a need to increase student representation to amplify the student voice and ensure that university governance is an inclusive two-way discussion.	Policy making will consider the diverse experiences and needs of our student body.				
Student Representation	AG	High	Review existing student representation structures in place for value add & outcome measures. Consult with faculties, staff, students and Academic Associations about their priorities and how we could achieve them collaboratively.	Students feel they are heard and valued by the university and their faculty/department. Staff and students alike feel more positive about the academic delivery and pastoral support in place. Satisfaction is greater.	R			A

			<p>Rework existing structures/create new spaces for conversation alongside students and staff, monitor impact and evaluate with a view to fine-tune.</p> <p>Consider existing successful methods of student engagement at King's (King's 100, KBS20, SSPP25) as a springboard for new conversation and co-creation platforms as identified as a priority in King's Education Strategy 2017-2022.</p>	<p>New innovative ways of teaching, learning, supporting and empowering students are created.</p> <p>Student engagement, interaction, mental health and wellbeing, sense of community, awareness of KCL and Faculty are all boosted.</p> <p>Staff receive less complaints and are able to work more in tandem with the student population and vice versa.</p>				
Accessibility & Inclusivity in Governance	AG	Medium	<p>Ensure through all policies, conversations and decision-making, that King's have the concerns, values, beliefs and wishes of all students at heart, which includes but is not limited to:</p> <ul style="list-style-type: none"> Students with disabilities, including hidden disabilities, chronic health conditions and mental health conditions Students of different ethnic backgrounds, with a specific focus where 	<p>King's Community is an inclusive, welcoming, celebrated community where people's identities and individual circumstances are not discriminated against.</p> <p>All students are able and feel empowered to achieve their academic, personal and social potential during their time at university.</p>	R			A

			<p>possible/appropriate to black students</p> <ul style="list-style-type: none"> • Students who identify as LGBTQIA+ and/or of non-binary gender identities • Students from a range of socio-economic backgrounds • Students who have caring responsibilities • Students who have left the local authority care system. <p>Recognising a lack of knowledge of the experiences of a number of these identity groups, championing the inclusion of student voice directly at every step possible.</p>					
Community for all four campuses	AG	Medium	<p>From an academic perspective, working with relevant Faculties to bolster a sense of community, particularly in these isolating times we find ourselves in.</p> <p>Configure new ways of working, recognising the VP Education Health role has been vacant for a number of months, to share ideas, resource and time to creating a welcoming</p>	Students of Denmark Hill campus in particular feel part of the student body, value their connection both to King's and KCLSU, and are able to make the most of their (sometimes limited) time at King's College London.	B			R

			environment for students new and returning.				
Focus on Careers & Employability	HR	High	Consult with the senior members of the careers department and communicate on how to provide a more inclusive service for PGT students. Conduct a survey around mid-November 2020 to gain an insight of PG student opinions and their expectations of the service.	PGT students in particular will feel more supported in their career choices. Introduction of career education seminars will provide further knowledge for students to pursue their prospective careers. The results of the survey will help me and the careers department to plan events accordingly to cater for the needs of the students.	A		G
Social Interests & Engagement	HR	High	Postgraduate students are usually disengaged with the university and the union, therefore I want to tackle this through increased social interaction between postgraduate students. Therefore improving the mental health and wellbeing of these students as they become more integrated into the King's community. Planning inter-departmental/ inter-university networking opportunities for students to gain an opportunity	Increasing interaction between students will help students feel a sense of community and belonging. This will also help focus on the "isolated" campuses I.e. Denmark Hill which hosts mainly PG students and therefore improve their mental health and wellbeing. Inter-university networking opportunities to build relationships and connections between students from different universities.	A		G

			to connect with students from different courses and universities.				
Financial Feasibility	HR	Medium	The large financial investment of a university education is a burden on many students. In order to improve accessibility, there should be a third instalment of tuition fees for self-funded students, whether they are classed as Home/EU or International. This would be able to improve financial viability of paying tuition fees and be particularly impactful for those of disadvantaged socio-economic background.	Students will be able to pay in 3 instalments which levies some financial burden of paying in 2 instalments. Student wellbeing improves due to increased flexibility in paying tuition fees.	R		R
Welfare support on a faculty scale	TY	High	As a student, your department is often your go to for any concerns because it is what you are most familiar with. The welfare support available at KCL and KCLSU tends to be very centralised and generic with a lot of students unaware of more specific services that are provided. This often means that there is a delay for students in getting help or	Students will be able to access support more easily or be signposted to specific departments and student services as need be. Tailored support which is quick, easy to access and familiar to students will allow for better targeted support for students and therefore a better student experience.	R		G

			not getting any support at all. As a student I found that there wasn't much support coming directly from my department who would understand certain module pressures, deadlines and workload. There is currently scope for faculty welfare leads in departments and I hope to work closely with those involved to ensure that there is low scale, fast access to support and guidance for students who need specific and bespoke support.				
Third instalment for self-funded students	TY	High	The majority of self-funded students at KCL have to pay tuition fees in 2 instalments compared to 3 instalments from Student Finance funded students. This places a great strain and stress on these students who have to work alongside studying for their degree, disproportionately affecting students from lower socio-economic backgrounds.	Carry on the Slice the Price campaign started in 2017 to allow for a third instalment for more students to access to reduce financial burdens and stress.	R		R

Financial signposting	TY	Medium	Accessing bursaries, scholarships and financial aid can be difficult to access on the website resulting in less people applying and using them, especially to those who need it most.	Have an updated page of financial support available for students to easily access and navigate. This will improve overall student wellbeing due to reduced finance induced stress.				
Decolonising the Curriculum	TY	Medium	In the light of the BLM protests happening around the world and institutions making commitments to anti-racism and diversity, it is important that this is highlighted in education and leading universities such as KCL.	Diversifying the curriculum and liberating our education, for students of all faculties, allows for BME students (and staff) to be able to engage more in celebrating diversity and acknowledging problematic pasts of academics and educators.	A			A

Evidence Mentioned:

KCLSU Research Bureau: In line with the Representation and Connection themes of the KCLSU's Strategy, a KCLSU Research Bureau has been established in order to ensure that the breadths of an issue is understood. The projects highlighted will ensure that evidence is gained in order to provide a comprehensive understanding on the issue.

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