

King's College Council

Meeting date	18 November 2024
Paper reference	KCC-24-11-18-03
Status	Final
Access	Members and senior executives

Meeting of the King's College Council to be held on **18 November 2024 at 17:00 in the Council Room, King's Building, Strand Campus.**

Agenda

COMMUNITY STORY:

The meeting will begin with a 30-minute community story on the PAIR experience 1700

1	Welcome, apologies and notices		Chair	1730
2	Declarations of interests (to note)	KCC-24-11-18-02	Chair	
3	Approval of agenda	KCC-24-11-18-03	Chair	
4	Unanimous Consent Agenda , including:	KCC-24-11-18-04	Chair	
	4.1 Minutes of the Previous Meetings	KCC-24-11-18-04.1		
	4.2 Council Rolling Calendar of Business	KCC-24-11-18-04.2		
	4.3 Actions Log	KCC-24-11-18-04.3		
5	Matters Arising	Verbal	Chair	
6	Report of the Chair	Verbal	Chair	1740
7	Report of the Vice-Chancellor & President			1750
	7.1 Summary Report on Key Issues	KCC-24-11-18-07.1	Vice-Chancellor	
8	Strategic discussion			
	Reflections from the Council Away Day session	Verbal	Vice-Chancellor	1800
9	Major items for approval			1820
	9.1 Report of the Finance Committee [RESERVED]	TO FOLLOW	Chair FC	
	(i) Financial Statements 2023-24 and Auditor's Management Letter (to approve)	Annex 1		
	(ii) Five Year financial Forecast to Office for Students for review and approval	Annex 2		
	(iii) King's Endowment Fund Ethical Investment Policy (to approve)	Annex 3		
	(iv) Bush House South West Wing OBC (to approve)	Annex 4		
	(v) Champion Hill Update (to approve)	Annex 5		
	(vi) Investment Subcommittee Annual Report (to note)	Annex 8		
	(vii) Management Accounts Month 2, 2024-25 (to note)			

See the Consent Agenda for remaining items

	9.2 Report of the Estates Strategy Committee [RESERVED]	KCC-24-11-18-09.2	Chair ESC	1840
	(i) Bush House SWW OBC (to approve with FC)			
	(ii) Champion Hill Update (to approve with FC)			
	<i>See the Consent Agenda for all other items (all to note)</i>			
	9.3 Membership of the Council [RESERVED] (to approve)	KCC-24-11-18-09.3	University Secretary	1900
10	Report of the KCLSU (to note)			1905
	10.1 KCLSU Officers' report (to note)	KCC-24-11-18-10.1	KCLSU Vice-President	
	10.2 KCLSU Returning Officer's Report [RESERVED] (to note)	KCC-24-11-18-10.2		
11	Reports of Committees			1910
	11.1 Report of Academic Board	KCC-24-11-18-11.1	Chair AB	
	(ii) Ongoing Conditions of Registration for Office for Students 2023-2024 (to approve)	Annex 1		
	(iii) 2022-2025 Action Plan Against the Concordat to Support Development for Researchers – Progress - Report for UUK (to approve)	Annex 2		
	<i>See the Consent Agenda for remaining items (all to note)</i>			
	11.2 Report of Audit, Risk & Compliance Committee	KCC-24-11-18-11.2	Chair ARCC	
	(i) Finance Statements and External Audit Report & Letter of Management Representation (to approve)	Annex 1 & 2		
	<i>See the Consent Agenda for remaining items</i>			
	11.3 Report of the Staff & Culture Strategy Committee	KCC-24-11-18-11.3	Chair SCSC	
	<i>See the Consent Agenda for all items</i>			
	11.4 Report of the Remuneration Committee			1920
	(i) Annual Report of the Remuneration Committee [RESERVED]	KCC-24-11-18-11-4.1 KCC-24-11-18-11-4.2	Chair RemCom	
	(ii) Report of the Remuneration Committee [RESERVED AND RESTRICTED]		Vice-Chancellor/Chair	
12	Any other business	Verbal	Chair	
13	Meeting Adjourned	Verbal	Chair	

Post-meeting drinks reception – thank you and farewell to retiring members

Lord Geidt
November 2024



Declaration of Members' Interests

Action required

- ☐ For approval
☐ For discussion
☒ To note

Executive summary:

This report records the standing declarations of interest of Council Members. Members are asked to advise the Secretariat of any changes and to declare any conflicts of interest for the business to be considered in the current meeting.

Declaration of Members' Interests

The following report lists the declared interests of each member of the King's College Council. Members are requested:

- (i) To confirm that the record against their name is correct, or to inform the College Secretary of any changes which need to be made.
- (ii) To highlight any items on the agenda of the current meeting which contain any potential conflict of interest for any member.

Christopher Geidt (Chair)

- Chairman, ICP Group Holdings Limited (and associated companies) (insurance)
- Director, Hurista Advisory Ltd
- C&E MacKenzie (farming)
- The Nuffield Trust for the Forces of the Crown (Trustee)
- House of Lords (Crossbench Member)
- Member, Advisory Board, Lumina Global SARL (materials science)
- Member, Ohrid Group (of former politicians, diplomats and officials) advising all parties in North Macedonia
- President of the Royal Overseas League
- *The Queen's Commonwealth Trust (Chairman) (interest ceased 26 January 2023)*
- *Chairman, International Relations and Corporate Responsibility, Schroders plc (asset management) (interest ceased 6 January 2023)*

Vivek Ahuja

- Non Executive Director, abrdn plc (wef October 1, 2024)
- Non Executive Director, The Royal Free NHS Foundation Trust (from October 1, 2024)
- Non-Executive Director, PZ Cussons Plc
- Non-Executive Director, NatWest Markets Plc.
- Fellow member of the Institute of Chartered Accountants in England & Wales (ICAEW)
- *CEO, Terra Firma Capital Partners Ltd. (interest ceased 30 April, 2024)*

Natasha Awais-Dean

- Head of Research Operations (RMID)
- Visiting Research Fellow (History) King's
- Trustee, Society of Jewellery Historians
- Co-Chair, Berkhamsted Swim Club (voluntary)
- Official, Swim England (voluntary)
- Expert Advisor (Export Licensing Unit), Arts Council England
- Member of the Society of Jewellery Historians
- Member of the Society of Renaissance Studies

Tom Berry

- Trustee, Employers' Network for Equality and Inclusion
- MikeWorldWide London (MD)
- Aequitas Global (advisor)
- Sutton Grammar School (teacher)
- With PR (EOT Trustee)
- Be Less Beige Ltd (owner)

- Mental Health First Aid England (NED)
- Member of the governing body of Glenthorne High School
- Be Less Beige Ltd
- One Question Ltd
- Culture Circle Ltd

Paul Cartwright

- Governor, King's College London Mathematics School
- Chaplaincy volunteer at West Hertfordshire Teaching Hospitals NHS Trust
- Fellow of The Institute of Chartered Accountants in England and Wales

Donna Catley

- Chief People Officer, Diploma PIC
- Member of the Labour Party

Jon Coles

- United Learning Trust
- Chair of Education Policy Institute Advisory Board

Vinay Jha

- Data Director and Foundation Business Lead, Lloyds Banking Group (from Feb 2024)
- Chief Tech Officer & EMT Member, Diligenta Limited (ceased Jan 2024)
- Chief Innovation and Digital Officer, M&G Plc (ceased July 2023)

Shitij Kapur

- Vice-Chancellor & President, King's College London
- Non-Exec Director, Russell Group of Universities
- Member, Advisory Board of the Medical Research Future Fund, Australia
- Member, International Advisory Council, SusTech University, Shenzhen, China
- Member, Collegiate Council, University of London
- Commissioner, International Higher Education Commission
- Chair, UUK Advisory Group on Free Speech & Academic Freedom

Ron Kerr

- Guys and St Thomas' Foundation Vice-Chair
- Advisor to Board: Guy's and St Thomas' NHS Foundation Trust
- Chair: NHS Providers
- NED Guy's and St Thomas' Enterprises Ltd
- Ad hoc consultancy services
- Member, Royal Society of Arts
- Member, Institute of Healthcare Management

Steve Large

- Senior Vice President (Operations), King's College London
- Employer Director, Superannuation Arrangements of the University of London (SAUL)
- Director, King's Talent Bank Ltd
- Director, King's College London Business Ltd
- Director, College Facilities Ltd
- Fellow of the Chartered Association of Certified Accountants

- Member of the Chartered Institute of Management Accountants

[Note: King's participates in SAUL as our support staff pension scheme. King's is the sole customer, 100% shareholder and funder of kcl Ventures Ltd, King's Talent Bank Ltd, KCL Business Ltd and College Facilities Ltd, all of which rely on King's for various management & related services.]

Rachel Mills

- Senior Vice President (Academic), King's College London
- Trustee, King's Maths School
- Visiting Professor (unpaid) University of Southampton
- Non-Executive Director, Centre for Environment, Fisheries and Aquaculture
- Membership: Royal Society of Chemistry, Royal Society of Biology, Challenger Society for Marine Science

Kim Piper

- Dean for Education FoDOCS & Professor of Oral & Maxillofacial Pathology & Academic Director (Student Success)
- UCAT
- Health Education England- Training Program Director for Oral& Maxillofacial Pathology.
- National ARCP and Recruitment member
- Joint Chair of the Blended Learning group for Dental Therapy for HEE
- Royal College of Pathologists- Chair of Examiners and QAA
- Royal College of Surgeons- SAC Member and Clinical advisory group
- International Association of Dental Research- Group Program Chair
- British Society of Oral& Maxillofacial Pathology Exec Committee

Clare Sumner

- Chief Policy Officer, Premier League (from 8 January 2024)
- *Director, Policy for the BBC (ended December 2023)*

Nhuoc Lan Tu

- Senior Independent Director Shawbrook Bank Ltd & Shawbrook Group Plc
- Non executive director WNS Holdings
- Non executive director Paypoint Plc
- Director, Lonsdale Road Management Company Ltd
- Self-employed Consultant - Advisor to Mental Health at Work CIC (ceased December 2023)

Stephan Weiner

- Board Advisor, MediClinic Group Limited, Chair of Finance Committee and Remuneration Committee
- Crown Commercial Service - Non Executive Director, Chair of Audit Committee

Jon Zehner

- Arnold House School, Member of the Board of Governors
- Cambridge Land Economy Advisory Board, Trustee
- Board Member, Montagu Mansions Freehold Limited
- African Parks Foundation UK, Chair
- ULI Charitable Trust, Trustee
- LaSalle Investment Management
- Vukile Property Fund (Johannesburg Stock Exchange listed REIT)
- Trustee of the Urban Land Institute

Unanimous Consent Agenda

The consent agenda is used to deal expeditiously with routine matters and reports, leaving more time for more strategic discussions. The items included are expected to be non-controversial and unlikely to engender questions. These items, whether for approval or information, are dealt with by a single motion to accept/receive for information. Before taking the vote, 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.

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

Item	Title	Paper	Action
4.1	Minutes of 10 July 2024 meeting Minutes of 9 October 2024 meeting	KCC-24-11-18-04.1	Approve
4.2	Council Business Plan	KCC-24-11-18-04.2	Note
4.3	Actions Log	KCC-24-11-18-04.3	Note
9.1	Report of the Finance Committee	KCC-24-11-18-09.1	
	(i) Execution of Deeds Policy	Annex 6	Approve
	(ii) Annual review of Cash Investment Returns		Note
	(iii) Student Recruitment 2024/2025		Note
	(iv) Procurement Annual Report	Annex 7	Note
	(v) Student Futures Phase 2 Quarterly Update		Note
9.2	Report of the Estates Strategy Committee	KCC-24-11-18-09.2	
	(i) Virginia Woolf Building Exit – space efficiencies		Note
	(ii) Director of Estates & Facilities Report		Note
	(iii) Major Project Status report		Note
11.1	Report of the Academic Board	KCC-24-11-18-11.1	
	(i) Ongoing Conditions of Registration for the Office for Students	Annex 1	All to note
	(ii) Report on the Researcher Concordat Action Plan	Annex 2	
	(iii) Research Integrity Annual Statement		
	(iv) Research Publications Policy		
	(v) Board Assurance Framework and Link to Academic Board		
	(vi) NSS and PTES and Student Experience		
	(vii) Revised Emergency Regulations		
	(viii) Chief External Examiner Overview report		
	(ix) Chair's Actions		
	(x) Report of the College Education Committee		
	(xi) Report of the College Research Committee		
	(xii) Election of Associates of King's College (AKC)		

11.2 Report of the Audit, Risk & Compliance Committee		KCC-24-11-18-11.2	
(i)	Annual Report of the University in respect of the Prevent duty	Annex 3	Approve
(ii)	Annual College Safeguarding Report	Annex 4	Approve
(iii)	Annual statement on Research Integrity	Annex 5	Approve
(iv)	Annual report of the ARCC	Annex 6	Note
(v)	Internal Assurance Update		Note
(vi)	Board Assurance Framework – progress and next steps		Note
11.3 Report of the Staff & Culture Strategy Committee		KCC-24-11-18-11.3	
(i)	HR Strategy Thriving Staff Community		Note
(ii)	Committee Membership and remit		

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Paper reference	KCC-24-11-18-04.2
Status	Final

Council Business Plan

Action required

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

Paper Explanation for Members

Why is this paper being presented?	This Council business plan is presented at each meeting of GNC and Council for information and is intended to provide some guidance as to what members might expect to see on their meeting agendas over the course of the year.
What are the key points/issues?	<p>The functions of Council are defined in the Charter and Statutes and the Ordinances and include, among other things:</p> <ul style="list-style-type: none"> • defining and upholding the university's mission, vision and strategic direction • monitoring the university's progress against agreed goals • establishing management systems and monitoring their effectiveness • ensuring that delegated responsibilities are clearly defined for the university's standing committees • ensuring that the university has effective risk management and internal controls • overseeing the effective and prudential operation of the university • approving and monitoring commercial undertakings <p>The Calendar outlines in broad terms when these matters are discussed at Council over an average year. As they become known, unique proposals (such as capital projects) will be added to the Calendar with estimated timing. The Calendar will be included as a standing information item in each agenda pack.</p>
What is required from members?	To note.

Paper Submitted by:

Dr Sinéad Critchley
 University Secretary & Director of Assurance

Council Business Plan

Strategic discussion

The first meeting of the Autumn term is a full-day Away Day. Time is also set aside for deliberate strategic discussion at the January and May meetings of Council as these are meetings at which the amount of transactional business is minimal.

Council receives regular updates on progress toward goals and objectives of the various elements of the university's strategy.

Regular Agenda Items

Council's work is supported by a number of committees and sub-committees and at each of its meetings will receive reports as appropriate from:

- Finance Committee
- Audit, Risk & Compliance Committee
- Estates Strategy Committee ([Capital Projects coming up for approval in blue](#))
- Governance & Nominations Committee
- Academic Board
- Fellowships & Honorary Degrees Committee
- Chairs' Committee
- Remuneration Committee
- Staff & Culture Strategy Committee

Council will receive reports and updates on a range of regulatory, compliance and planning matters including among others:

- Ongoing Conditions for OfS
- National Student Survey Results
- Admissions and student number planning
- Safeguarding
- Prevent
- Health & Safety
- Fundraising

The 2023 governance review resulted in the following items being introduced into the Council Business Plan:

- Student/community story to be scheduled before each Council meeting: schedule to be added to calendar of business and reviewed annually by GNC in June.
- A benchmark KPI report (no more than 12-15 in total) RAG rated, offering trajectory over time, with a named executive lead – at each meeting of Council.

Council Business Plan

Italicised items are those that are expected to return every year.*

	Item	Council Action	Submitted By
9 October 2024 AWAY DAY	Strategic focus meeting – full day	Discuss	Vice-Chancellor & Senior Executive Team
	Business meeting: VWB Decant 152-158 Strand	Approve Approve	AP Campus Futures VP Finance
118 November 2024 <i>(Business focus)</i> Council Room, Strand	Community story – PAIR experience	Discuss	Professor of Marketing, KBS
	<i>Financial Statements*</i>	Approve	Finance Committee
	<i>Update on Five-year Forward Plan for OfS*</i>	Approve	Finance Committee
	<i>Management Accounts</i>	Note	Finance Committee
	<i>Investment Subcommittee Annual Report</i>	Note	Finance Committee
	<i>External Audit Report and Management Letter of Representation*</i>	Approve	Audit, Risk & Compliance Committee
	<i>Annual Statement regarding the Prevent Duty*</i>	Approve	Audit, Risk & Compliance Committee
	<i>Annual College Safeguarding Report*</i>	Approve	Audit, Risk & Compliance Committee
	<i>Annual Report of the ARCC</i>	Note	Audit, Risk & Compliance Committee
	<i>Internal Assurance Update</i>	Note	Audit, Risk & Compliance Committee
	<i>Annual Research Integrity Statement*</i>	Approve	Audit, Risk & Compliance Committee & Academic Board
	<i>Annual OfS Registration Report*</i>	Approve	Academic Board
	<i>Researcher Concordat Action Plan: 2024 Report*</i>	Approve	Academic Board
	Champion Hill	Note	Estates Strategy Committee & Finance Committee
	Bush House Southwest Wing OBC	Approve	Estates Strategy Committee & Finance Committee
	Committee memberships	Approve	Chair of Council/Chair of GNC
	KCLSU Returning Officer Report	Note	KCLSU
	<i>Annual Report of the Remuneration Committee*</i>	Note	Remuneration Committee

20 January 2025 <i>(strategic focus)</i> Council Room, Strand	Student/community story -TBC	discuss	TBC
	Modern Slavery Act Annual Statement*	Approve	Chief Procurement Officer/Audit, Risk & Compliance Committee
31 March 2025 <i>(Business focus)</i> Council Room, Strand	Student/community story -TBC	discuss	TBC
	Annual Health & Safety Report*	Approve	Audit, Risk & Compliance Committee
	Annual report of the Chief Procurement Officer*	Note	Audit, Risk & Compliance Committee
	Enterprise Portfolio Management	Note	Audit, Risk & Compliance Committee
	Fellowships of the College	Approve	Fellowships & Honorary Degree Committee
12 May 2025 <i>(Strategic focus)</i> Council Room, Strand	Student/community story -TBC	discuss	TBC
	Access and Participation Plan Monitoring Report*	Approve	
21 July 2025 <i>(Business focus)</i> Bush House 8 th Floor	Student/community story -TBC	discuss	TBC
	KCL/KCLSU Memorandum of Understanding	Approve	Vice-Chancellor & President
	KCLSU Returning Officer's Election Report	Note	KCLSU President
	Draft Integrated Planning Process 2024-2027 and 2024-2025 Budget Setting	Approve	Finance Committee
	Annual Report of the Fundraising Ethics Review Group	Approve	Audit, Risk & Compliance Committee
	Annual Fundraising Compliance Report	Approve	Audit, Risk & Compliance Committee
	Membership & Searches	Approve	Governance & Nominations Committee
	Report on senior team performance and remuneration	Discuss	Remuneration Committee
	King's Student Protection Plan	Approve	Academic Board
	JEI SUSTech Student Protection Plan	Approve	Academic Board

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Paper reference	KCC-24-11-18-04.3
Status	Final



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	Action	Notes	Owner	Original deadline	Progress
10-07-24	7	Report of the Vice-Chancellor	Student Experience and Satisfaction Surveys Further results had been received that morning and analysis would need to be undertaken and those results brought back to Council.	Presented to Council on 9 October	Vice-Chancellor	9 October	Complete
10-07-24	8.1	Report of the KCLSU President	KCLSU Returning Officer's Election Report (<i>RESERVED</i>) KCLSU Returning Officer's Election report to be circulated to Council members once completed – (<i>RESERVED</i>)	On 18 November Council agenda	KCLSU	Once completed	Complete – on 18 November Council agenda
10-07-24	9.2	Report of the Finance Committee (Student Futures)	Student Futures Academic oversight of Student Futures would be led by Professor Michael Escudier. The Senior Vice President (Operations) also invited a member of Council to jointly Chair the Assurance Board.	Council Member, Vivek Ahuja has joined the Student Futures Board	Senior Vice President (Operations)		Complete
10-07-24	9.2	Report of the Finance Committee (Student Futures)	Student Futures There is an expectation from both the Finance Committee and the Audit, Risk & Compliance Committee to review progress each quarter (and from November 2022 Council meeting, for Council to scrutinize the programme implementation)	Ongoing	Finance Committee & Audit, Risk & Compliance Committee	Ongoing	Ongoing – quarterly reports being submitted
10-07-24	9.4	Report of the ARCC (Cyber Security Update)	Cyber Security Update There had been discussions in relation to standards within cyber security at ARCC. Academic communities were protective of their independence. There was a need to reconcile their independence and the University's mitigation of this risk. A further update would be considered at the Committee's November meeting.	Action to be added to the ARCC Action log	Audit, Risk & Compliance Committee	ARCC November meeting, updated to ARCC March 2025 meeting	Ongoing

Meeting	Minute	Topic	Action	Notes	Owner	Original deadline	Progress
21-11-23	7	Report of the Vice-Chancellor (King's Digital)	When last considered by Council at its 2022 Away Day there had been a very ambitious plan to take all online learning back from Pearson, but it had since transpired the cost would be too high and a modified plan had been adopted. Two tranches of courses had been taken care of and consideration was now being given to the third tranche of courses. This would be brought back to Council for assurance purposes, and in future King's Digital would be part of the usual planning cycle.	Update provided to 9 October Council meeting	Vice-Chancellor	10 July meeting, updated to 9 October 2024	Complete
22.11.22	5.3	Student Success Transformation Programme	Opportunities for Council to scrutinise the programme implementation	Now named "Student Futures"	VP (Education)	Throughout 2023	Replaced by a later action – see above: 10 July 2024/Minute 9.2/Student Futures
23/11/21	7.1 (iii)	LIHE	Review of benefits two to three years post-occupation against what was promised.		SVP (Operations)	2026	In progress

Dr Sinéad Critchley
University Secretary and Director of Assurance
November 2024

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Access	Members and senior executives –note <i>RESERVED</i> items

Vice-Chancellor's Report

Action required

- ☐ For approval
☐ For discussion
☒ To note

Paper Explanation for Members

Why is this paper being presented?	Report from Vice-Chancellor & President highlighting current issues and events and developments since the last meeting of Council.
What are the key points/issues?	Admissions; Welcome success; student acquisition; Government Budget; NSS actions; Student Futures II; HR updates
What is required from members?	To note

Paper Submitted by:

Vice-Chancellor & President

Vice-Chancellor's Report

Section A - Current topics



b) Student Fee Income

The financial effect of this is a very small adverse variance against budget of below £5m. We would expect our income from tuition fees to be around £65m (+10%) higher in 2024/25 than in 2023/24. This is a very strong recovery from the 2023/24 position.

Welcome to King's success

This year's Welcome to King's adopted a dynamic two-week model, blending online resources with vibrant on-campus activities to equip and engage our new students from day one. In the first week, students accessed essential information online, setting a strong foundation. During the second week, they were welcomed and inducted in person across campuses, with over 16,000 attending 188 King's-organized activities, 250 campus tours, and 850 faculty-led induction events. This success was made possible through the collaborative efforts of staff from multiple areas across King's, working together to deliver a seamless and welcoming experience.

Processes ran efficiently and effectively, with suitable flexibility for students arriving late for example where they experienced visa issues. Student satisfaction with the Welcome to King's experience reached 4.18 out of 5, and 88% of students found the Welcome Hubs engaging and relevant, both these figures are a notable improvement on last year.

International Student Recruitment Acquisition Update

Given the importance of international and the challenges and competition in recruitment, I had commissioned two external experts to review our marketing-recruitment-admissions efforts. The review confirmed strong global demand for King's education programs but pointed out that our current efforts were not joined-up enough and agile enough for the tough years ahead. Key recommendations from the review emphasized the importance of deepening market insights, strengthening King's physical presence in

strategic regions, and shifting the focus from broad marketing efforts to specific recruitment and conversion initiatives. This approach includes developing Faculty-specific recruitment plans rather than general ones, and restructuring operations by consolidating recruitment and admissions into a single Directorate to enhance efficiency and alignment.

In the short term, the focus is on key markets including China, India, North America, the Middle East and Southeast Asia—where tailored activities will be deployed to boost recruitment for the 2025 entry cycle. Additionally, a conversion strategy is being developed to enhance the applicant journey and improve enrolment rates, supported by a thorough review of current contracts and processes to optimize applicant engagement. Other critical initiatives include assessing the efficiency of King's overseas offices for potential expansion, evaluating the global agent network to ensure strategic alignment, and building recruitment and conversion teams' capabilities through specialized training.

To lead this strategic shift, Katie Bell has been appointed Interim Director of Global Recruitment and Admissions from 4 November, bringing extensive experience in marketing and change delivery. Supporting her is a project management team led by James Langlands from Nous Consultancy, with additional expertise from international education consultants who will help drive the implementation of the change plan required during 2024-25.

The upcoming months will focus on consulting on, designing and implementing the new structure and recruiting a permanent Executive Director of Global Recruitment and Admissions. Collaborative efforts across Faculties and targeted training for recruitment teams will be essential to deliver this transition so we meet our ambitious growth plans in both home and overseas markets. The new Directorate of Global Recruitment and Admissions is accountable to the SVP Academic, and will work to deliver the IPP targets and to drive the aspirations for growth that will define the size, shape and form of King's.

Government Budget 30 October 2024

King's will be liable for higher employer national insurance contribution rates from April 2025, and this is likely to add £4m to costs in financial year 2024-25 and £13m (and inflated with salary costs) in future full years.

There had been rumours that there would be a sizeable reduction in university research funding. However, the spending allocations announced would suggest that this has been protected and there will be a modest (inflation) increase in 2025-26.

There were no spending announcements related to the teaching funding of UK students or any change in the maintenance funds available to UK students in the 30 October budget. However, the Secretary of State for Education subsequently made a parliamentary statement on 4 November, increasing the maximum cap on UK undergraduate tuition fees and the available maintenance loan to students by 3.1%. The increase in the tuition fee cap from £9,250 to £9,535 is the first since 2017/18. The announcement was accompanied by expectations that universities will work to improve access and reduce attainment gaps for under-represented students - aims which King's certainly shares. The announcement was stated to be a single year increase (ie with no guarantee of further linkage to inflation) although we would hope that there will be further announcements in the Spring 2025 spending reviews on student tuition fees and grants and maintenance support for students. The uplift in the maximum tuition fee cap would apply to all full time UK undergraduate students in English universities from September 2025. We estimate that this will add £4m per annum to King's income given our current UK undergraduate population from 2025-2026.

NSS actions

Based on careful and detailed analysis of the 2024 qualitative and quantitative data, we have set a target of 2% improvement of NSS by the next cycle and identified three key areas that require urgent attention to

positively affect the 2025 results. These are: (i) supporting health-faculty students on placement; (ii) significantly increase academic support in departments so that students have greater access to academic and support staff; and (iii) making sure that assessment and marking schemes are refreshed, consistently used, and communicated effectively with students. How much emphasis we place on each of the three broad issues will depend on particular programmes and NSS data analysis. To achieve our target of 2% we have modelled outcomes based on prior years experiences, degree of change possible and coming year's cohort size.

While Faculties and Departments are responsible for delivering the local changes – this is being coordinated centrally through the Vice Deans and the College Education Committee. We will need to communicate directly with those students who will be completing the survey in the spring, in the departments and programmes that are most critical. Initial meetings with the Vice President (Education) and final-year students are underway (October/November), plus a series of follow-up communications and opportunities for a wider cohort of students to engage. In terms of ensuing academic and professional services compliance with the action plans, the senior team will undertake regular monitoring of faculty strategies and implementation of action plans.

Student Futures II (SFII)

In July 2024, Council approved the Phase 2: Improve Essentials Business Plan and the investment of £12million over 2024-2026. Following Council's approval in July 2024, Student Futures has made significant progress to set-up the programme delivery team and infrastructure required to deliver a programme of this size and complexity. The first Assurance Committee meeting taking place on 31 October, increased faculty and student voice representation across each layer of governance, and commenced monthly reporting to the University Executive. Raising awareness and buy-in for the Programme over 18 sessions with faculties, directorates, student sabbatical officers. Eight business cases have been developed with seven being approved by the Programme Board, allowing project delivery to accelerate. The next quarter is focused on the development of the remaining business cases (for example, Timetabling, and enhancements to Student Acquisition and Conversion), delivery of live projects, and ensuring our community remains supportive and engaged in the change programme.

Please note SFII is not designed to influence the 2025 NSS, as the start of the NSS (Feb 2025) is too soon to accrue the benefits of the changes implemented.

HR updates

Senior Vice President (Operations)/Chief Operating Officer (COO) update

We are reaching the end of the search process to identify a replacement for Steve Large, Senior Vice President Operations/COO. We have shortlisted four candidates and held stakeholder panels on 1 November and an interview panel on 8 November. I will give a verbal update at the Council meeting.

Vice President People & Talent/Chief People Officer

Following Fiona's decision to leave King's and take up another opportunity, we have appointed an interim Chief People Officer, Lisa Adams for the rest of this academic year. Lisa is a highly experienced strategic Chief People Officer, with three decades of senior leadership experience in large, global and complex organisations across the public, private and not-for-profit sectors. Her early career was with Accenture, followed by talent and organisational development roles in two FTSE 100 companies and executive development and transformation for an historic national institution in the Third Sector. More recently, Lisa has held roles as Senior People Director roles in the Civil Service for two large UK Government departments and Interim Executive Chief People Officer for an NHS Integrated Care Board.

Section B – President’s External Visits/Meetings/Visitors

26th Sep – Permanent Secretary Dinner re Shared Growth Initiative
26th Sep – KHP Annual Conference
1st Oct – PVC Education and COO from Nottingham Trent University
2nd Oct – VC University of Sydney
9th Oct – Diwali celebration hosted by High Commission of India
14th Oct – Rachel Statham, Special Advisor to the Prime Minister
21st Oct – Health collaborations dinner with City University
22nd Oct – King’s and Courtauld reception
23rd Oct - Managing Director (Research), and Senior Strategic Leader, EAB
28th Oct – visit by 10 European Presidents and VCs from the Circle U Partnership
28th Oct – visit by SUSTECH University Chair and Dean of Medicine

Section C - Media Coverage

- We welcomed new and returning students and staff during Welcome Week by hosting an [Opening of the Year Ceremony](#) in the Chapel. Celebrating the diversity of King’s, we experienced Hindu song and dance, Islamic scripture, Jewish and Sikh prayer, Christian choral music, as well as speeches by Virajit Singh from KCLSU and our Olympian alum Dina Asher-Smith.
- I was delighted to host the Mayor of London, Sadiq Khan, Deputy Mayor for Culture and the Creative Industries Justine Simons, and Debbie Weekes-Bernard, Deputy Mayor for Communities and Social Justice, to share the power of art and the importance of personal stories of refuge at the launch of Es Devlin’s ‘Congregation’. This is part of King’s Culture’s programme of art and ideas ‘Lost & Found: Stories of sanctuary and belonging’. ‘Congregation’ has been co-authored by 50 Londoners who have reflected upon their lives in London, as well as their journeys from more than 25 countries, including Syria, Sudan, Ukraine and Afghanistan.
- This month, we have also been hosting a series of events to mark Black History Month. This includes a two part event by our Race Equality Network to celebrate and explore this year's theme, ‘Reclaiming Narratives’, and the Harold Moody Lecture to celebrate the legacy of the great Black Briton, Dr Harold Moody.
- Dr John Jumper, one of the winners of the 2024 Nobel Prize for Chemistry, came to King’s the day after the announcement to talk to students. Dr Jumper was awarded the world-famous prize for his work on protein structure understanding.
- King’s research and studies continue to attract national and international media coverage, imputing valuable insight into current debates and issues. This includes a King’s study on assisted dying which found that 63% of people in England and Wales support legalising assisted dying for terminally ill adults, while concerns about potential risks remain, covered in the Independent, Mail Online, Sky News, ITV news, La Croix and L'Express. A study which found a new relationship between lipids and diseases impacting metabolism in children and could serve as an early warning for conditions like liver disease, was covered in The Guardian, The Independent, The Standard, the MailOnline, The Mirror, the Hindustan Times and the Hindu. King’s researchers found that the evolution of bones in primates’ knees could have implications for how humans evolved to walk upright and featured in The Independent, The Standard, the MailOnline, ITV, Sky News, La Vanguardia and Europa Press.
- King’s academics also continue to provide commentary on the Middle East and Ukraine and feature regularly in media outlets across the world, including Dr Ahron Bregman quoted in The Telegraph, Sky News, L'Huffington Post and was a guest on France24's The Debate, Dr Andreas Krieg who was interviewed for BBC News and quoted in Reuters, the MailOnline and The Japan Times. Professor Michael Clarke who wrote a piece for The Times and Dr Marina Miron quoted in The New York Times, The Boston Globe, i News, Al Jazeera and interviewed on BBC News.

Shitij Kapur, Vice-Chancellor & President
November 2024

King's College Council

Meeting date 18 November 2024

Paper reference KCC-24-11-18-10.1

Status Final

Access Members

Report of the KCLSU

Action required

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

Paper Explanation for Members

Why is this paper being presented?	The College Council receives an update from KCLSU at each of its meetings.
What are the key points/issues?	<ul style="list-style-type: none">• Introduction to the 24/25 officer team and an update on developing priorities and emerging areas for collaboration.• KCLSU Strategic Updates October: Building collective power for educational and social change, developing communities for all, and equipping students to lead.• KCLSU's newest draft of 'The Union Agenda'.
What is required from members?	King's colleagues are also invited to get in touch with the relevant KCLSU staff teams to follow up or enhance collaboration regarding the staff-led activities outlined in this paper. KCLSU officers invite staff for information or best-practice examples across faculties that can help them develop their priorities.

Paper History

Action Taken [noted/recommended/discussed/approved]	By [Committee name]	Date of Meeting
N/A	N/A	N/A

Paper Submitted by:

VP Postgraduate; King's College London Students' Union

Executive Summary

This paper summarises our recent activity, framed around three of KCLSU's four strategic objectives.

Building collective power for educational and social change

Activity:

- Student Voice Collaborative Work
- Union Agenda: Our collective vision for change at King's
- KCLSU's Officers for 24/25
- Officer Actions

Developing communities for all

Activity:

- Student Volunteering Projects

Equipping students to lead

Activity:

- Academic Rep Recruitment 24/25
- Rep Fest 2024

Strategic Updates

Building Collective Power for Educational and Social Change

Student Voice Collaborative Work

We have been working closely with the Student Futures team to support student voice on a range of projects. KCLSU's Student Voice Design Consultant is taking the lead on the student evaluation of the Cadmus pilot, working closely with Abbie King and the TASK Student Partners. They also attended the first meeting of the King's Experience Student Co-Governance Group and delivered an introduction to student voice, alongside Virajit Singh, KCLSU's VP Activities & Development. They are working with Steph White and Zak Evans to develop the next session, which will focus on supporting the Group members to engage effectively with a range of student community leaders to ensure they are facilitating a truly representative student voice. Over the coming months, they will also be supporting the NMES Attendance & Engagement Monitoring pilot, and the design and discovery of the Single View of Students project.

With our KCLSU Communications team, we are also working with Transformation Office Communications staff to develop cohesive student-facing messaging and an effective student communications and engagement plan for our partnership work with the Student Futures and Campus Futures programmes.

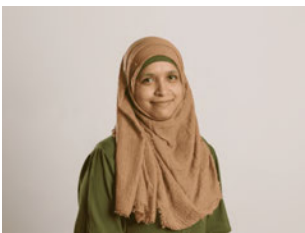



Union Agenda

We continue to develop our work on The Union Agenda: our collective vision for change at King's. This Agenda, while well received by King's Colleagues, is not a partnership document or collaborative framework but acts as the Union's own roadmap for long-term lobbying for student-led change. We have circulated a draft version as an appendix document. Certain aspects are subject to slight change and final approval, like vision statements.

Before we launch in November, we are looking at ways to tailor the message to resonate with student audiences. We welcome any comments on clarity of vision before launch.

KCLSU Officers 24-25

The Officer team is beginning to reflect upon progress made to develop their officer priorities, introduced at the start of their term. Below is a reminder of their roles and a further update on progress and actions taken so far.

	<u>Name & Role</u>	<u>Officer Priorities</u>	<u>Policy Zones</u>
	Sheeba Naaz VP Postgraduate vpp@kclsu.org	Decolonised and diversified curricula Festival-friendly timetables Focused employment guidance	Operation and management of education Student life and support Enhanced teaching and learning
	Julia Kosowska VP Education (Health) vpeh@kclsu.org	Cost of studying in London Transparency towards students System improvements (e.g., MCFs, personal tutors, assessment & feedback)	Operation and management of education Ethics and values Access to education
	Madeeha Saher VP Education (Arts & Sciences) vpeas@kclsu.org	Sensitive timetabling Transformed assessment and feedback Laptop bursaries	Operation and management of education Enhanced teaching and learning Access to education
	Virajit Singh VP Activities & Development vpad@kclsu.org	Bringing back the Cultural Ball Expanding student pantries Participation funds for extra- and co-curricular activity	Student Life & Support Campus Spaces Access to Education



**Haneen Farid
(HF)**

VP Welfare &
Community

vpwc@kclsu.org

Women's gym access

Affordable student housing

Ethical engagement & social impact Campus Spaces

Student life & Support

Ethics & Values

Officer Action Updates

To enhance officer visibility and presence on campus and foster key relationships with students, officers will host fortnightly drop-in sessions at The Shack. These sessions will provide a relaxed space for informal chats over Chai and other hot drinks. Officers will also direct students to a booking calendar where they can schedule one-on-one relational/listening sessions for more in-depth conversations. These one-on-one sessions are crucial for organizing and mobilizing our members towards common goals for change at King's.

Officers will also be supporting KCLSU's wellbeing week in November to ensure consistent touch points with the student population.

KCLSU officers are also participating in regular fortnightly meetings with the Students and Education Directorate (SED) and have received continued support from The Dean of King's. These meetings were informative, allowing officers to gain a deeper understanding of the behind-the-scenes work at King's and to identify allies that can support the priorities outlined in their manifestos.

A few highlights of key areas of engagement and priorities developed this term:

Sheeba thanks colleagues for an engaging Council away day. This month, she also attended the launch of the King's Doctoral College to strengthen KCLSU's support for postgraduate research students. Apart from attending and contributing constructively to the important committees and sub-committees, she has also joined the KCS Education Working Group to support building a community around Education for Sustainability. She will also support KCLSU's Student Voice team's Academic Board training, to help ensure that the Student Members feel well-equipped and confident to attend. Moreover, she has been developing her groundwork for furthering decolonisation and diversifying efforts in the curriculum. She has reached out to several people who could help her to understand what goes into planning and designing curriculum. She invites colleagues to share any existing operational processes and guidance around reading list creation to establish a foundation for further development.

HF would like to thank the variety of colleagues she has been able to meet to explore ethical investments. She is currently contributing to the Endowment Investments Ethical Policy Review and exploring ways to safeguard the political rights of students. She is particularly excited to work with the College Chaplain in planning events to foster a sense of communal harmony, which will bring together students from diverse backgrounds to strengthen understanding and inclusivity. She has met with relevant colleagues from King's Sport to discuss the feasibility of a women's only gym space and to develop practical considerations for privacy.

Virajit has met with the Associate Director of Belonging & Engagement to discuss the possibility of providing a Participation Fund. This month, Virajit and KCLSU's Student Voice Design Manager attended the first meeting of the King's Experience student co-governance group. They are collaborating with the Head of Student Community to develop the next session, which will be a workshop on the Student Voice Design Framework and how to engage meaningfully with student reps across the university. Examples of best practices in faculties would

be greatly appreciated to support this work. He gave a speech at the Kings Opening Year Ceremony on behalf of the Sabbatical Officers and co-hosted the Community Leadership Training.

Julia aims to build stronger relationships between KCLSU and health faculties. Part of this work involves consulting health students to understand any barriers to engagement with the Union. She attended the FoLSM Student experience Sub-committee and delivered an introductory talk at the MSc Neuroscience course (IoPPN) to start building these relationships. Furthermore, she attended the Circle U conference and general assembly on behalf of the officer team and hopes that this involvement will help strengthen interdisciplinary partnerships and knowledge sharing across European institutions.

Madeeha met with the Russell Group Students' Union (RGSU) Ethical Investment Priority Group to discuss KCL's ethical investments. This month, she also met with the family and friends of Dr Maisara, on the day of his vigil, and wrote a memorial article from the Students Union Officer team. She attends the Academic Regulations and Operations Sub-committee and plans to collaborate on sharing and evaluating new faculty grace-period guidance with students, to ensure consistency of approach across King's. She has developed a particular focus on ensuring that student timetables comply with the Equality Act 2010, particularly regarding religious observance and reasonable adjustments for students with disabilities.

Developing Communities for All

Student Volunteering Projects

KCLSU's Volunteering Team is excited to be supporting 17 inspiring volunteer projects through the first round of our Volunteer Project Fund, with a total of £26,350 awarded to bring these student-led initiatives to life.

Standout projects include free BSL classes, impactful health and medicine workshops led by a range of student societies, and a Widening Participation Taekwondo initiative. We're also welcoming the return of successful student-led projects like [Pride Beats Prejudice](#), [Teddy Bear Hospital](#), and [Kurdish language classes](#). In addition, we're proud to be supporting 10 Widening Participation projects, further expanding the reach and impact of our volunteering community.

With £6,320 still available and the second application window open until October 13th, there are plenty of opportunities for students to get involved, make meaningful connections, and contribute to positive change by volunteering this year.

Equipping Students to Lead

Academic Rep Recruitment 2024-25

We are pleased to announce that 1039 Academic Reps have been successfully recruited across all 9 faculties. This means we have seen an increase in 129 reps from the 2022/23 cohort; we suspect that this is in part due to a simplified process for recruitment that combines KCLSU oversight and marketing support with flexibility at faculty level. Furthermore, at least 100 of these representatives have continued in their role from 2023-24, which is a positive indicator that students find their role rewarding.

Timely data sharing continues to improve between Student Experience Teams and KCLSU. This has allowed KCLSU to communicate quickly with representatives shortly after recruitment and to provide targeted messaging to specific academic rep-cohorts when appropriate. For example, over the last few weeks we have run localised recruitment drives to populate the three remaining vacant Student Academic Board members from specific cohorts of eligible PGT students. Should colleagues wish to communicate with specific portions of our

representative cohort to provide exclusive opportunities, they are invited to get in touch at representation@kclsu.org.

However, there is still variety in the number of representatives recruited relative to the size of student population in different faculties. We will encourage faculties to reflect upon their recruitment and identify gaps in demographic representation to rectify appropriately for the 25/26 cohort.

Rep Fest 2024

Following the success of last year's representative training which welcomed over 500 attendees across three days, we are hosting [Rep Fest](#) 2024 again this year on the 30th and 31st of October, with a further catch-up session on the 7th of November. As part of the Student Voice Partnership Agreement, our rep training builds upon faculty training by offering all reps the chance to network with fellow representatives across disciplines, develop their influencing skills to effectively represent their peers in Student-Staff Liaison Committees, and meet the Student Voice team and connect with our likeminded networks of student campaigners, Academic Associations and Officers.

A combined effort from faculties and KCLSU to advertise Rep Fest training has seen 600 tickets sold so far.



UNION AGENDA

OUR COLLECTIVE VISION FOR CHANGE AT KING'S

Our agenda is more than just words on a page—it's our shared declaration of what we believe in, what we're fighting for, and the future we want at King's.

Starting with a common room at King's in 1873 for students to foster community, we are the oldest students' union in the country. We are now over 53,000 members strong, from 96 countries in the world¹. We are undergraduates and postgraduates across five central London campuses.

We believe in a future where every member belongs and has the opportunity to thrive. We know that when we come together, our collective voice has the power to create real educational and social change. That's why our agenda lays out a clear vision for a better university where our rights are protected, our experiences matter, and our voices are heard.

There is no university without us. Our agenda is the result of years of our collective feedback. From students and reps attending department committees, signing campaign petitions, answering surveys, attending forums, voting on Community Leader and Officer manifestos in our elections - now is the time to use that voice to reimagine the future we want to create at King's.

Our agenda is also our commitment to each other and our pledge to hold ourselves accountable. We will remain true to the values we've set forth and focus on the mission we've created. This is our promise, as students and as members of KCLSU, to each other, and to the future university we will build together.

This is our union. This is our agenda.
Together, we will make our vision a reality at King's.

OUR SIX KEY ASKS FOR KING'S

1. ACCESS TO EDUCATION:

We expect to learn and study at a university that values us as learners, where education and access to equitable education are prioritised over profit.

2. OPERATION AND MANAGEMENT OF EDUCATION:

From admission to graduation, we want a smooth-running, efficient and effective operation. We expect well-managed services that enhance and facilitate our learning experience.

3. ENHANCED TEACHING AND LEARNING:

We expect a stimulating educational experience that offers equitable and high-quality learning opportunities that reflect our diverse needs.

4. STUDENT LIFE AND SUPPORT:

We expect supportive, enriching, and inclusive student support services that improve the student experience at King's.

5. ETHICS & VALUES:

As students, we expect to research, study, and have a university experience shaped and driven by ethical principles and values.

6. CAMPUS SPACES:

We expect to learn in well-equipped, purpose-built spaces tailored to our needs, fostering a positive learning environment.

ACCESS TO EDUCATION:

We expect to learn and study at a university that values us as learners, where education and access to equitable education are prioritised over profit.

WHAT ARE STUDENTS SAYING?

- King's students: ²
 - Are concerned about the cost-of-living crisis (99%)
 - Feel like their general student experience has suffered because of the cost-of-living crisis (88%)
 - Believe their academic performance has suffered because of the cost-of-living crisis (69%)
 - Have considered deferring their studies (1 in 4) or dropping out (1 in 5) due to financial worries
 - Who pay international fees report that adding more fee instalments would benefit them³
- Across the UK, students are working more hours in work that is often precarious and poorly paid.⁴

WHAT DO WE KNOW?

Students deserve a university that promotes and protects equality of opportunity for all, where their background or household income should not pose a barrier to access and success. This is especially important considering the ongoing cost-of-living crisis.

However, there are clear patterns as to which groups of young people go to higher education in the UK and which ones do not. For one, pupils eligible for free school meals are much less likely to go to university, while black students are more likely to drop out of higher education and the least likely to attain a first or upper-second-class degree.⁵ Such data indicates which groups need tailored attention and interventions to ensure equality of opportunity in the UK HE sector.

Academic performance may also falter as students are compelled to commit more hours to paid work due to financial pressures. Disabled students, mature students, estranged or care-experienced students, and postgraduate research students report having to take on more paid work than the general student population.⁶

OUR VISION

- As students, we want to enjoy the full experience of King's, without having to worry about finances.
- We need more readily accessible financial support packages and guidance.
- We want lower prices across every campus and all areas of the student experience, from Welcome to Graduation.

- We must ensure that students from disadvantaged backgrounds can get their degrees.

OPERATION AND MANAGEMENT OF EDUCATION:

From admission to graduation, we deserve an efficient and effective operation. We expect well-managed services that enhance and facilitate our learning experience.

WHAT ARE STUDENTS SAYING?

- Of final year undergraduate students at King's: ⁷
 - 66% feel their course is well organised
 - 71% feel changes to their course are well communicated.
 - 65% say they have received their feedback on time, down 6.1% from last year.
- Postgraduate-taught students at King's are more likely to feel like their course is well organised, but only 67% feel encouraged to be involved in decisions about how their course is run.⁸
- Academic reps are saying teaching timetables are too dispersed while exam timetables are too concentrated – with both being released too late.⁹
- Student satisfaction for organisation and management drops by 10% for students with disabilities. The difference is largest for students with cognitive or learning difficulties (53% compared to 70%)¹⁰

WHAT DO WE KNOW?

Operation & Management has been a historically low theme on King's National Student Survey (NSS) results throughout the years. For 2024, Organisation & Management positivity scores went up 2% but remains one of the weakest areas with the second largest gap to national benchmarking.¹¹ In its free-text comments, the word 'timetabling' appeared exclusively in negative comments.

In the Postgraduate Taught Experience Survey (PTES) the trend is similar, with an increase in positivity scores, while the theme itself remains one of the weakest areas¹².

To tackle these challenges, the 2023 Teaching Excellence Framework (TEF) saw King's identifying student success as their top priority for investments for the next few years.¹³ This is happening through their transformation programme now known as Student Futures, aiming to improve professional services and operating systems across the University. This was a win for KCLSU, especially in how Student Futures committed to student-led interventions guided by student experiences.

OUR VISION

- We imagine adequate, timely and effective operation and management of our education that both students and staff have confidence in.

- Confidence that the administration of our course, from teaching to revision and assessments to feedback, respects the competing responsibilities students have and support us to do our best.
- Confidence in a timetabling policy guided by a 'inclusivity-by-design', considering students' non-academic commitments - such as part-time jobs, caring responsibilities, faith, and extra-curricular activities -- as well as the mental and economic costs associated with timetabling issues.

ENHANCED TEACHING AND LEARNING:

We expect to receive an enriched educational experience that offers equitable and high-quality learning opportunities that reflect our diversity and diverse needs.

WHAT ARE STUDENTS SAYING?

- Undergraduate & Postgraduate students at King's note teaching staff as a core strength of their university experience.¹⁴
- On assessments and feedback, however:¹⁵
 - Only 60% of undergraduate students feel the feedback they receive on assessments helps them to improve their work.
 - Only 64% of undergraduate students say the marking criteria used to assess their work was clear.
- For students in the UK, a diverse and inclusive curriculum is associated with the credibility and rigour of their course and institution.¹⁶

WHAT DO WE KNOW?

King's College London provides teaching and learning to a diverse student body, half of whom are international.

King's tends to do well on teaching and learning in students surveys. This is seen across the Teaching and Learning Opportunities themes in the NSS, and the Resources & Services and Teaching & Learning in the PTES – all top scoring themes of KCL. The quality of teaching and learning is also reflected in the 2023 TEF where King's obtained an overall silver, indicating that students' experience at King's are of very high quality.¹⁷

However, assessment and feedback remain an area with room for improvement, evident in the NSS and noted in the TEF. Assessment & Feedback is the lowest scoring theme in the 2024 NSS results, also with the largest gap to national and RG benchmarking. This is largely driven by the operational aspect of assessment, - e.g. timeliness of feedback. Yet, results also show that the extent to which feedback helps students improve their work is inconsistent. Such is corroborated in the TEF student submission which shows that the quality of assessment feedback varies, as does the support students receive in

OUR VISION

- An assessment process that is simplified, fair, and transparent is within reach.
- We want high-quality, tailored feedback implemented cohesively across faculties. It's important as students that we understand our marks and learn from them.
- We don't all learn in the same way; our diverse student population has a range of needs that should be considered when designing teaching.
- Our teaching should be of high quality and reflect the times we live in, drawing on rich and diverse scholarship that also challenge dominant Eurocentric narratives.

STUDENT LIFE AND SUPPORT:

We expect supportive, adequate, and inclusive student support services that improve the student experience at King's.

WHAT ARE STUDENTS SAYING?

- 87% of students in the UK want more affordable accommodation to be built.¹⁹
- 1 in 3 students in the UK have poor mental wellbeing.²⁰
- Disabled students at King's note inconsistent experiences and long wait times for mental health and disability services.²¹
- Among postgraduate taught students at King's, overall satisfaction is low for disabled students, who are also the demographic most likely to consider dropping out of their studies.²²
- Only 60% of postgraduate taught students at King's feel part of a student community.²³

WHAT DO WE KNOW?

In just 5 years, the UK HE sector has seen an increase of 300,000 full time students, with only 85,000 more purpose-built student accommodation built in the same period²⁴. Students are becoming increasingly reliant on the private rental sector where they can more easily be exploited.²⁵ For one, international students face issues when looking to secure private accommodation, paying six months' rent upfront or having to pay an agency £300 to act as their guarantor.²⁶ For the average student across the UK, rent now accounts for almost 100% of the average student maintenance loan in England. There is a clear need for more affordable student accommodation and increased support for students vulnerable to rogue and exploitative private rental practices.

We know that home students in the UK are over seven times more likely to report mental health conditions to their university than a decade ago.²⁷ Further, confidential student survey responses find much higher rates of poor mental health than disclosed to universities. Student Minds have also found

mental health inequalities in part-time, distance learner and commuter students, as well as LGBTQ+ and international students.²⁸ Intervention strategies in form of student support must account for the diverse background of students and the mental health inequalities that may arise from such.

Conversations about belonging have also taken centre-stage across higher education, especially following COVID-19. A 2022 landmark survey and accompanying recommendations from WonkHE and Parsons – with KCLSU being one of 15 partner SU's – found that the facilitating connection is the greatest impact universities can hope to have on students sense of belonging.²⁹ The latest King's specific data available tells us that postgraduate taught students experience low levels of community,³⁰ while undergraduate students, especially non-white students, express the importance of building interpersonal relationships with other students in NSS free-text comments.³¹

OUR VISION

As students at King's, we face new experiences and challenges. To thrive, we need KCL to provide a sense of security, support and community.

We want all students to have:

- Security of accommodation that's affordable and accessible from first year and beyond.
- Access to a network of accessible support systems, taking diverse student needs into account.
- Careers support that provides tangible on-the-job learning experiences, so we feel secure towards our future.
- A feeling we belong as part of a student community through extra-curricular activities that also enhance our student experience and academic performance.

KING'S ETHICS & VALUES

As students, we expect to research, study, and have a university experience that is shaped and driven by ethical principles and values.

WHAT ARE STUDENTS SAYING?

- 98% of students in the UK agree that their institutions should take sustainable development seriously.³²
- Students in the UK value ethical engagement and social impact as part of their educational experience³³
- Over 200 students are calling for King's to cut ties with fossil fuel industries through the 'Fossil Free Careers' KCLSU campaign³⁴. A further 18 Students' Unions across the UK support the Fossil Free Careers campaign.³⁵

WHAT DO WE KNOW?

In its 2029 Strategic Vision, King's puts social responsibility on a par with education and research as a fundamental mission of the institution – saying they will 'not be held back by conventional views of what universities do'.³⁶

A commitment to social responsibility is evident across King's. For one, King's is committed to rapidly scaling up their response to the climate emergency through their Climate & Sustainability Action plan which sets out 14 key impact areas to guide the university's approach to sustainability and climate change.³⁷

As a driver of good equality, diversity and inclusion practice, King's holds a silver Athena Swan Gender Charter award, and a bronze Race Equality Charter award, both led by Advance HE. King's is also a member of Stonewall UK as a Diversity Champion employer, and a member of the Business Disability Forum.³⁸

In 2024 King's introduced a value-based impartiality guidance in responding to geopolitical and social issues, providing a set of guiding principles for individual and University-wide responses.³⁹ Here, King's as an institution say they will not express a view on geopolitical or social issues unless it impacts the safety and security of its staff and students, regardless of whether it has done so in the past. However, such restraint as a corporate body should not encourage silence within the University – quite the opposite, as King's encourages staff and students to engage in 'scholarly discussion of these very complex issues'.

OUR VISION

As students we want to be proud partners of the University. To feel a sense of pride, we need transparency.

- We want to study at a university that considers its position in the world, engages with its legacies, and considers ethical and social impact.
- When humanitarian crises occur, we hope to feel part of a collective voice that can advocate for the support the student community needs.

CAMPUSSPACES:

We expect to learn in well-equipped, purpose-built spaces that are tailored to our needs, fostering a positive learning environment.

WHAT ARE STUDENTS SAYING?

- Disabled students face significant challenges in accessing the King's estate and King's Residences⁴⁰
- A lack of social and study spaces hinders commuter students' sense of belonging⁴¹
- Over 200 students are calling for a Department of Political Economy common room, highlighting the demand for spaces tailored to students' both academic and wellbeing needs⁴²
- Waterloo students are dissatisfied with offerings at their campus⁴³

WHAT DO WE KNOW?

King's College London is a city-university – spread out across the city as opposed to concentrated on one campus. Overall, King's has 5 campuses across London, but even within these campuses building can be spread out and with long walking distances. On-campus offering may vary across locations and faculties, for example in the case of common rooms. The spread-out nature of the university also poses challenges to disabled students.

King's is currently investing millions of pounds into Campus Futures, a long-term project to improve campus spaces. Such plans should be informed by student voice.

OUR VISION

- We need spaces that grow with and adapt to our increasing student population.
- Our campus spaces should be sustainable and fit for purpose: from facilitating teaching excellence to reaching a new personal best at the gym.
- Accessibility and the voice of disabled students are central to improving our campuses.
- We want to work alongside KCL to shape innovative spaces that work for students in generations to come.

DRAFT

CREATING OUR UNION AGENDA

UNITING OUR VOICE

KCLSU is a democratic organisation representing our tens of thousands of members, who are the student body of King's College London. The Union Agenda is the result of recent and historical insights from students at King's, emerging from surveys, elections, minutes, forums and campaigns. Put into conversation with sector research, it's not just a testament to student voice, but students' rights and best practice for universities.

In designing our six asks of King's we turned to the OfS Conditions for Registration (specifically A to C), but also frameworks such as Sparqs' Student Learning Experience Model – a model for student-staff partnership work.⁴⁴ This allowed us to design six key asks informed by the regulatory obligations of universities in England and best practices across the UK.

The primary evidence base for the Union Agenda is made up of various qualitative insights gathered by or on behalf of KCLSU and King's.

This includes data dashboards and reports from the 2024 National Student Survey (n = 5124) and Postgraduate Taught Experience Student Survey (n = 3483). It also draws on the 2023 TEF Student Submission, in large part based on accumulated student insights from 2018 up to 2022. Further, we draw on priorities' students voted on in the 2024 KCLSU Elections as well as surveys conducted by the Student Voice team at KCLSU. This includes a timetabling survey sent out to academic reps in December 2023 completed by 141 reps across all 9 faculties, and a fee instalment survey sent out to international students in April 2024 completed by 237 international students across 8 faculties.

We have also used insights from our various representation practices, including 7 student forums held across the 23/24 academic year as well as consultations on both freedom of speech and access and participation. Finally, we have used insights from the Student Voice team's listening campaign in spring of 2024. The campaign gathered qualitative insight from student members across 121's - usually scheduled - or conversations at a 'listening campaign stall' where multiple students drop by. Whether from a 121 or from a stall session, main points emerging from the conversations were recorded and stored in post-listening records.

We have turned to sector research to inform and support the asks in the agenda. As a member of the National Union of Students, we have looked to the 2024 Manifesto for our Future outlining key priorities for students in the 2024 general election based on consultation with over 10,000 students across the UK. Similarly, we have drawn on resources from the Russell Group Students Union, including the 2023 Cost of Living survey completed by 404 King's students and the 2024 Student Manifesto - one our student officers contributed to. We have also used statistics from Student Minds and their research on mental health across UK universities, and WonkHE for insights on belonging. For student

demographics, we turned to official King's and KCLSU numbers and data from the Higher Education Statistics Agency (HESA).

This work is ultimately a collective expression of the student voice of all our members and would not be possible without their spirit and engagement. Although the Union Agenda is a long-term vision that highlights many complex issues that may feel intractable at times, our members' continued engagement reflects their hope and belief that a better future is possible through student and staff partnership. The Union Agenda belongs to them all and grants us all the responsibility to bring this vision for the King's student experience into reality.

DRAFT

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King's College Council	
Meeting date	18 November 2024
Paper reference	KCC-24-11-18-08.2
Status	Final
Access	Members and senior executives - RESERVED

KCLSU Returning Officer's Report

Action required

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

Paper Explanation for Members

Why is this paper being presented?	The Returning Officer's report is considered annually by Council as an assurance that KCLSU elections (held in the Spring) have been conducted freely and fairly.
What are the key points/issues?	<p>The Returning Officer is jointly appointed by King's and KCLSU and is an experienced Director at the National Union of Students Charity.</p> <p>KCLSU elections in the Spring of 2024 operated appropriately, with only a small number of complaints needing to be dealt with during the process. Processes have been stable and operating well for the past few years.</p> <p>It was known at the time of the election that one of the candidates for President was facing disciplinary charges. These charges were subsequently upheld, and the Returning Officer adjudicated that this breach of the Trustee Code of Conduct made the candidate ineligible to have stood. A recount of votes took place, but this occurred late in the year, and it proved not possible to appoint the candidate with the most votes. Therefore, KCLSU is operating without a President for this year.</p> <p>A governance review of KCLSU has been undertaken and new Articles drafted, with changes to its bye-laws also anticipated. These will need to be considered by Council, alongside potential changes to the Memorandum of Understanding, at the January meeting.</p>
What is required from members?	To note the report.

Paper History

Action Taken [noted/recommended/discussed/approved]	By [Committee name]	Date of Meeting
Confirmed receipt and noted the report	KCLSU Board meeting	18 July

Paper Submitted by:

Darren Wallis
Director of Students & Education

Denis Shukur
Chief Executive, KCLSU

KCLSU Elections 2024

Deputy Returning Officer Report

18 item Returning Officers Report KCLSU Elections 2024: BoT 18-07-2024

Background

KCLSU Elections took place between January and May 2024, with the election of 3,706 places across 3,527 positions. This report is a final report.

Elections being run:

Student Officers	<ul style="list-style-type: none">• President• VP Activities & Development• VP Education (Arts & Sciences)• VP Education (Health)• VP Postgraduate• VP Welfare & Community
Student Trustees	<ul style="list-style-type: none">• Student Trustees x4
Academic Association Committee Members	<ul style="list-style-type: none">• Bioscience Students' Association• Dental Council• King's Doctoral Students' Association• Law Council• Nightingale Council• King's Business School• IoPPN Student Association• Medical Students' Association
Student Group Committee Members	<ul style="list-style-type: none">• 397 Student Groups• 3391 positions
NUS Delegates	<ul style="list-style-type: none">• NUS Delegate 12

Election Timeline

Nominations open	10am, 29 January
Nominations close	10am, 19 February
Candidate briefings	Student Officer & Trustee Candidates: <ul style="list-style-type: none">• 5 – 7 pm, 19 February, Guy's Campus• 12 – 2 pm, 20 February, online• 5 – 7 pm, 20 February, Bush House• 12 – 2 pm, 21 February, online (last chance)
Manifesto deadlines	9pm, 21 February

Candidates Announced	27 February
Voting open	10am, 4 March
Voting closed	4pm, 7 March
Results announced (including President provisional results)	15 March

By-election Timeline

Nominations open	10am, 5 April
Nominations close	10am, 12 April
Manifesto deadlines	12pm, 16 April
Candidates Announced	18 April
Voting open	10am, 23 April
Voting closed	5pm, 24 April
Results announced	1 May

Returning Officer and Project Support

The Returning Officer and Deputy Returning Officer were appointed by King's College London on recommendation from the KCLSU Trustee Board:

Returning Officer	Peter Robertson - NUS
Deputy Returning Officer	Kathryn Sullivan
Elections Disciplinary Support	Thaniyah Miah – Community Development Manager
Elections Project Manager	Sophie Adams – Democracy Development Coordinator

Headline Election Statistics

	Main election	By-Election	Total
Number of elections	3,527	2,273	5,800
Number of elected places	1,481	834	1,515
Total submitted nominations	2,981	1,499	4,480
Incomplete Nominations (didn't attend compulsory briefing)	40	-	40
Candidates withdrawn	360	163	523
Candidates disqualified	0	0	0
Candidates completing the election	1,469 (unique candidates)	892 (unique candidates)	
	2,529 (total candidacies)	1,341 (total candidacies)	3,870 (total candidacies)
Individual Voters	4,839	1,661	5,492
Total votes cast across all elections	58,458	9,105	67,563

Complaints and campaigning misconduct:

12 official complaints were received through the formal elections process.
9 complaints in main election and 3 complaints in by-election.

Main elections complaints

There were only 9 complaints made during the main elections process for Spring 24, which is a significant reduction on previous years.

- 1 complaint was regarding posters in the library - upheld: the posters were removed by the complainant and a reminder issued to all candidates not to utilise this space
- 1 complaint was regarding the offer from a candidate to purchase food for everyone if they were elected - not upheld: the offer of food was a celebratory one, and not connected to the casting of votes
- 1 complaint was regarding a student group encouraging their members to vote RON as second place choice - not upheld: the student groups are free to express their election preferences
- 1 complaint was regarding a candidate using a photograph in their manifesto that was not of them, but of a specific politician, which was felt by the complainant to be disrespectful - partly upheld: Utilising a political figure's image in this way does not breach the elections principles per se, but the candidate was instructed to present a photo of themselves after KCLSU staff were instructed to remove the politician's image. If a photo is to be used in a manifesto, it needs to be of the candidate themselves.
- 1 complaint was regarding a candidate's use of imagery connected to the political conflict in Gaza - not upheld: the candidate is free to express opinions on any topic they deem relevant to the student body
- 1 complaint was regarding what the complainant referred to as "attacks" on two candidates within a student group - not upheld: no evidence was provided to support the allegations
- 2 complaints were identical in body, but submitted by two different students about the fairness of a student group endorsing specific candidates - not upheld: this is allowed under KCLSU rules and not a breach
- 1 complaint was regarding the eligibility of a candidate who would be completing their studies before the end of their term of office if they were elected - not upheld: a candidate is eligible if they are deemed a student at the time of their election. If they cease to be a student during their term, then a process would be implemented at that point.
- There was a question of candidate eligibility in the elections as prior to the close of nominations an internal disciplinary process commenced the outcome of which may have made candidates ineligible to run in the elections. The decision was taken to not declare the results of any election where there was an eligibility question until the disciplinary process was completed. Only the Presidential election was affected by this, so all other elections were declared and closed off. At the conclusion of the process and candidate was deemed ineligible, due to the Union by laws and the Presidential election was counted and declared.

By elections complaints

3 complaints were received during the by-elections process:

- 1 complaint was about the omission of RON in a student group by-election - not upheld: there is no requirement to include RON and the elections had already been opened once before.
- 1 complaint was regarding the endorsement of a candidate from a student group which stated the whole committee were in favour - when their opponent was a member of said committee - not upheld: the committee were asked to consider their wording as clearly that one opponent did not endorse the other candidate, but the endorsement itself was legitimate
- 1 complaint was regarding a candidate using their student group official status to endorse themselves via the group's instagram account - not upheld: the evidence showed the endorsement of the candidate from the student group, but not that the candidate themselves had posted it, or without due process.

Year by year comparison (main election)

	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015
Allegations of Misconduct	9	43	9	14	29	20	47	20	18	3
Allegations investigated	2	38	5	9	23	13	29	-	-	-
Allegations not investigated*	7	5	4	5	6	7	18	-	-	-
Allegations brought to	0	1	2	1	17	5	13	0	4	0

candidate disciplinary										
Candidate Disciplinary	0	0	1	1	6	2	4	0	1	0
Candidate Disqualifications	0	0	0	0	6	0	1	0	0	0

***Allegations weren't investigated because:**

- Complaints made about alleged conduct that isn't prohibited in KCLSU elections.
- No details regarding the alleged breach were included in the complaint
- Complaints were received after the formal complaints' deadline

Year by year comparison (By-election)

	2024	2023
Allegations of Misconduct	3	0
Allegations investigated	2	0
Allegations not investigated*	1	0
Allegations brought to candidate disciplinary	0	0
Candidate Disciplinary	0	0
Candidate Disqualifications	0	0

***Allegations weren't investigated because:**

- Complaints made about alleged conduct that isn't prohibited in KCLSU elections.
- No details regarding the alleged breach were included in the complaint
- Complaints were received after the formal complaints' deadline

Key Findings

1. KCL Confessions endorsement

There was a complaint received before elections were properly opened, regarding the instagram account, KCL Confessions, and whether they were in breach of any rules by declaring that they were open to officially endorsing candidates. The complainant asserted that the account was looking for payment in return for said endorsement.

The DRO met with KCLSU election staff support to ensure consistency of understanding of the issues and to contact KCL Confessions directly for responses. Following clarification from the account that there was to be no financial exchange, and given the unofficial and anonymous nature of the account, it was deemed that there could be no breach in effect and the account was free to endorse whomever they chose.

2. Manifesto accuracy / legitimacy

Staff were concerned regarding the accuracy and/or legitimacy of candidate manifestos prior to the nominations being announced. It was agreed that it is not KCLSU's job to police the truthfulness of any election material and that we should only step in if there is an elections principles breach (which includes any potential libel arising from allegations stated).

3. KCLSU Student Media

As in previous years, the student media groups were keen to work with the DRO and elections staff to maximise their involvement in the democratic processes, conducting a candidate question time event with the Presidential candidates and running relevant articles throughout the elections. Student media officials sought guidance on the best balance between freedom of speech and fair elections processes, and ran a successful programme of journalism to bring the elections to as wide a section of the student electorate as possible. The RO team would officially like to thank the student leaders involved for their cooperation and diligence.

4. Nominations queries

We received several queries regarding the requirements of the nominations process, such as compulsory attendance at one of many briefings. One prospective candidate was disqualified for non-attendance after many alternatives were offered to them. One candidate for a VP role asked, post nominations, to swap the role they were standing for and were denied.

1 complaint was regarding a student group rolling over their committee positions from one year to the next. The group was instructed to open the relevant positions to all candidates.

5. Eligibility to stand

There was some confusion over the requirement of existing student group officers to separately purchase membership of said group in order to stand. In most cases, the officer in question was simply ruled ineligible as notices had been clearly sent on more than one occasion, and groups were reminded not to promise nominations could be taken outside of the KCLSU elections process, as this had compounded misunderstandings. However, in one case, the ineligibility of an existing officer was only established after the election was half way through, making the election no longer free and fair. This election was cancelled and nominations reopened. The officer in question had been able to purchase membership in the intervening time before the by-election, which caused consternation amongst their opponents, but as other by-elections were permitting the purchase of membership, it was deemed a fair compromise.

Areas to address going forward:

Once again, this was, in the main, a well run process, and the work of previous years in tightening up the principles was evident in the significant reduction in the number of complaints. In particular, the work of Sophie, Thaniyah and the supporting team to ensure that the data was accurate, that IT systems could handle spikes in activity, and clear communication regarding the processes made the rest of the elections much smoother sailing! The RO team would like to thank all KCLSU staff involved in the process for their continued hard work and dedication.

That being said, there is always room for improvement and the confusion over student group eligibility was obviously a problematic area. It is **recommended** that this process is reviewed to either automatically make officials members of the group for the subsequent academic year, or that all officials are sent a separate email asking them to check their membership status well in advance of the deadline for purchase. The length of time the disciplinary process took caused some problems for the election which was exacerbated by the publishing of the Presidential election poll data which, as the election had not been returned, was an error.

The rules on endorsement are not universally understood, so **consideration should be given** to how this is explained, not just to student groups themselves, but to candidates and students more widely.

The late recognition of the ineligibility of a student group official to stand due to lack of membership was down to a dual system being in place in the back end of the IT system. Given that this is the second year where this has happened, it is **recommended** that a full sweep of the student groups is conducted over the summer to ensure there is no duplication or other IT issue which would cause a similar issue. It is appreciated that this is a laborious task, but the time invested is better at that stage than having to unravel an election conundrum after voting has opened.

A briefing for staff is given over email each year, but it might be **useful** to consider a live version which covered some general principles that may be not universally shared, as in this year's case with the manifesto check suggestion. This would ensure that the consistent efforts to make elections a KCLSU wide event over the past few years would be enhanced.

The keenness of KCLSU Student Media to support the elections is a really positive thing, and it would be **useful** to involve the relevant student leaders in discussions with the DRO and elections support staff at a very early stage to see how their activities could truly enhance the elections process.

In the opinion of the RO team, the elections at KCLSU were fair and free, and we wish each successful candidate all the very best for their terms of office.

Deputy Returning Officer
Kathryn Sullivan
17 July 2024

Report of the Academic Board

Contents	Meeting at which considered	Consent agenda	Council action
1. Ongoing Conditions of Registration for the Office for Students [Annex 1]	30 October 2024	Yes	Approve
2. Report on the Researcher Concordat Action Plan [Annex 2]	30 October 2024	Yes	Approve
3. Research Integrity Annual Statement	30 October 2024	Yes	Note
4. Research Publications Policy	30 October 2024	Yes	Note
5. Board Assurance Framework and Link to Academic Board	30 October 2024	Yes	Note
6. NSS and PTES and Student Experience	30 October 2024	Yes	Note
7. Revised Emergency Regulations	30 October 2024	Yes	Note
8. Chief External Examiner Overview Report	30 October 2024	Yes	Note
9. Chair's Actions	30 October 2024	Yes	Note
10. Report of the College Education Committee	30 October 2024	Yes	Note
11. Report of the College Research Committee	30 October 2024	Yes	Note
12. Election of Associates of King's College (AKC)	30 October 2024	Yes	Note

To Approve

1. Ongoing Conditions of Registration for the Office for Students [Annex 1]

Motion: That the annual report to the College Council on how King's continues to meet the Office for Students Ongoing Conditions of Registration, be approved.

Background:

The Office for Students (OfS) 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 new conditions introduced since the initial registration process. Assurance can be given that the University continues to meet these conditions of registration. The Academic Board recommends the report to Council approval and submission to OfS.

2. Report on the Researcher Concordat Action Plan – Progress Update to UUK [Annex 2]

Motion: That the progress report on the Researcher Concordat Action be recommended to Council for approval and onward submission to UUK.

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

Background:

King's is a signatory to the Concordat to Support the Career Development of Researchers. Signatories are required to submit an annual report on their approved action plan outlining the progress that has been made at their institution. This action plan is to be reported to Council for approval on an annual basis, and then onto Universities UK for external scrutiny. The College Research Committee welcomed the progress made in the past year and Academic Board approved the presentation of the report to Council.

Discussion points among Academic Board members included: requesting clarity on the process for the promotion of research staff, and for a clear policy regarding managing the transfer to open contracts following four years continuous service. The Vice President (Research & Innovation) pointed towards a recording of the Research staff Forum, which described such a policy, which is about to be launched. The question of research staff promotions is also due to be addressed at the Research staff Forum.

To Note

3. Research Integrity Annual Statement

King's is a signatory to the Concordat to Support Research Integrity. Signatories are required to submit an annual statement summarising the work undertaken to support research integrity at their institution.

In the last year the Research Integrity team have: created training modules; planned and hosted research integrity awareness days; produced guidance on use of generative AI in research; continued to contribute to the UK Reproducibility Network's open research programme. In the next year, the team intend to: launch online training modules; finalise the Code of Good Research Practice.

The College Research Committee had endorsed the Research Integrity annual statement and recommended it to the Audit, Risk & Compliance for approval, and to Academic Board for noting.

4. Research Publications Policy

Academic Board discussed and approved the revised research publications policy.

The Research Publications Policy has been revised and updated following the discussion at the College Research Committee in May 2024. The new policy extends the provision of 'rights retention' to book chapters which will aid funder compliance in light of new open access requirements. The Associate Director (Research & Impact), Libraries and Collections presented a revised version of the Research Publications Policy to the College Research Committee at the meeting on 25 September. The Committee approved the revised policy, though it was noted that books and book chapters will now not need to be made open access until after the next REF submission, and that a note should be added to clarify this.

Board Members sought assurance that the practicalities had been taken into account and that the policy would not reduce academic freedom. The Vice President (Research & Innovation) clarified that the University recognises that there may be situations where it is difficult to follow this policy exactly, and that there is an opt out clause if this were deemed to limit the choice or damage the career of early career academics. The University would monitor and take a pragmatic approach.

5. Board Assurance Framework and Link to Academic Board

Academic Board Members were provided with an update on the development of a Board Assurance Framework (BAF) (as recommended by the Governance Effectiveness Review 2023) and its' implications for the functioning of Academic Board, with the focus on providing Council with strategic advice on matters relating to academic quality. The University Secretary and Director of Assurance presented the draft Assurance Framework and the twelve thematic areas that had been identified as a focus for responsible committees, and which map to King's strategic goals and enablers. Five of the twelve areas related to academic quality and Academic Board had therefore been identified as the assurance committee required to give scrutiny to those areas in an intentional way. The BAF was still draft, and the responsible committees need to be comfortable with the wording and their

understanding of it. Regarding each row in the BAF allocated to Academic Board, Academic Board should be clear which report would contain that information and be content that it is presented in a timely fashion to influence discussion and decision. Feedback was sought.

During discussion, feedback was provided:

- The framework demonstrates accountability clearly.
- It is the responsibility of the Academic Board to have oversight. How much extra groundwork would be expected from the committees that feed into Academic Board in order that Academic Board can be assured that risks had been considered and the right questions asked?
- It was noted that sustainable research and innovation excellence related to regulatory and legal obligations. Strategic discussion of those two items were scheduled for Board discussion at its March meeting.
- Going forwards, the annual agenda plan should align with the BAF table.
- It was noted that Academic Board discussions covered the areas within the BAF framework already, but that planning and timing would be key.
- It was noted that the Staff and Culture Strategy Committee had been born from discussions at Academic Board and that there might be ways of collaborating with other governance committees.
- Further to concerns raised about workload increase, the Board was advised that the idea was rather to look more holistically and transparently at work programmes and understand the rationale of decisions being taken. It is about the principle of subsidiarity.
- It was noted that other subcommittees of Council also address issues that impact on academic outcomes, and that Council receives this oversight. However, was there a way for the individual subcommittees to become aware of each other's agendas?
- Council had the ultimate obligation to ensure that regulators' conditions are being met.
- Academic Board agenda planning to ensure that the cadence of its work programming aligns with decisions that must be made.
- The Vice-Chancellor summarised the discussion as support and endorsement for further aligning the work of the Academic Board to that of the Council. Perhaps the five separate areas could be rationalised into three domains so that they could be succinctly addressed. As for next steps the Vice-Chancellor requested the University Secretary and Director of Assurance and the Senior Vice President (Academic), on behalf of the Academic Board Operations Committee, to rationalise the Council requests into three major domains, agree the precise metrics/indicators/paper that will be brought to Academic Board, and during which meeting, and align this with when these matters are discussed at Council.

6. NSS and PTES and Student Experience

The Vice President (Education & Student Success) provided Academic Board members with an update on the National Student Survey (NSS), and the work being done within the University to address areas of weakness and improve average positivity scores for King's by 2%, including the immediate steps needed to address concerns from the 2024 survey. This will allow King's to draw par with the two other comprehensive Russell Group universities, who have similar and, in some cases, more challenging circumstances. Furthermore, large comprehensive universities like King's have been able to make a change of that magnitude within a year with concerted effort, and King's has shown that increased engagement with survey can bring about a move from the bottom to the top in two years. However, for some faculties this will require a significant improvement in their individual scores. All have submitted detailed action plan which address the priority areas of (i) Assessment and Feedback, (ii) Academic Support, and (iii) Clinical Placements, as well as any other specific issues where satisfaction is low. More in-depth analysis of qualitative data (open comments) was undertaken during the summer, and this has informed both the action plans and the discussions with Executive Deans and faculty leaders. The Vice President (Education & Student Success) reported that there was a real determination from faculties to bring about change.

During discussion, feedback was provided:

- Better communication needed about coursework and placement providers
- Better timetabling needed.

Student feedback:

- Assessment and Feedback: the issue, particularly for international students, is a lack of support in understanding the grading system, as they are used to quite different marking systems. What could be perceived as a low score elsewhere could be one of the best grades obtainable in the UK (e.g., of 80% provided). A student could very possibly work hard, achieve a good grade, but a lack of understanding of the grading systems brings a sense of demoralisation.
- The importance of consistency between those giving advice on assignments, and grading frameworks.
- Personal tutor group sessions: suggestion to consider standardizing the experience.
- The Vice President (Education & Student Success) agreed that more resource for these areas was needed.

Staff feedback:

- How are things going to evolve with AI.
- NSS is a tool that can be used to inform strategic thinking.
- Providing feedback to students is an essential part of university education.
- TASK (Transformation of Assessment of Students at King's) aims to build on good practice to achieve sustainable and effective assessment, as the volume of assessment feedback required is a main challenge.
- Timetabling and room challenges: the percentage of issues was small but the impact significant, making the University seem disorganized where it is not (the timetabling team were commended).
- Academics spend a lot of time dealing with significant problems throughout the year, problems often created by operational matters, for example exam marking, and this had not been recognised in the report. The Executive Director, Students & Education Directorate stated there is a task force trying to address these operational issues.
- Optimism at Executive Dean level that faculty and department alignment on assessment and feedback is attainable. It would require strong support of managerial staff.

The next meeting would receive a report on Student Futures 2, the aim of which was to address marking, timetabling, assessment, and progression, and would provide greater assurance to Academic Board, and therefore to Council.

7. Revised Emergency Regulations

Academic Board approved the revised emergency regulations. Following feedback from its meeting on 26 June 2024, Academic Board received revised emergency regulations for approval. The Board had noted some concerns regarding the initial proposal and the feedback was taken away and reviewed during the summer.

8. Chief External Examiner Overview Report

Academic Board approved the Chief External Examiner Overview Report 2023/2024. The new University Chief External Examiner role provides an external university oversight of King's assessment practices and standards, working with Faculty Chief External Examiners (another new role introduced in 2022/23), and being a member of the Assessment and Regulatory Oversight Sub-Committee. Academic Board received a summary of the Chief University External Examiners views from King's assessment practices during 2023/24, noting some reflections for the University to consider moving forward.

9. Chair's Actions

The Board confirmed the Chair's Actions taken during the summer/autumn 2024:

- (i) Revised Student Terms & Conditions 25/26

- (ii) Mitigating Circumstances Policy amendment
- (iii) Academic Regulations 2024-2025 amendments
- (iv) Postgraduate Taught Dissertation Framework
- (v) Singhasari Terms & Conditions 25/26

Information or papers related to any of the above items are available from the Secretariat.

10. Report of the College Education Committee

The Board also **approved** or noted the following items from the College Education Committee:

- (i) Proposal for a new type of King's award: PG Award (**Approved**)
- (ii) Intercollegiate Policy (**Approved**)
- (iii) Academic Calendars - King's Digital New Model 2025-2026 (**Approved**)
- (iv) Academic Calendars - Proposed six-week cycle calendar for Online Programmes for 2025-26, for those Category B programmes (**Approved**)
- (v) Artificial Intelligence (AI) update
- (vi) Student Survey Management Group – Survey Cycle 2024-25
- (vii) Module Evaluation Summary of Activity 2023-24
- (viii) HESA Graduate Outcome Survey (GOS) Results for 2021/22 Graduating Cohorts
- (ix) Higher Education Academy (HEA) Recognition Scheme: King's Professional Recognition of Teaching and Learning
- (x) Quality Assurance Handbook 2024-25
- (xi) Professional, Statutory and Regulatory Body: BPS and BABCP
- (xii) Periodic Programme Review reports
- (xiii) Admissions and Recruitment update
- (xiv) Academic Quality Assurance Refresh

Information or papers related to any of the above items are available from the Secretariat.

11. Report of the College Research Committee

The Board also noted the following items from the College Research Committee:

- (i) *CRC Subcommittee Updates*
- (ii) *King's Doctoral College*
- (iii) *Research Culture*
- (iv) *Environmental Sustainability Concordat*
- (v) *DSAIS Board - Report from Workshop*

Information or papers related to any of the above items are available from the Secretariat.

12. Election of Associates of King's College

The Board approved the list of students and staff who had most recently completed the AKC programme.

Professor Shitij Kapur, Chair
November 2024

Annual report to Council: ongoing conditions of registration for Office for Students 2023/24

1. Introduction

- 1.1 The Office for Students (OfS) monitors higher education providers using “lead indicators, reportable events and other intelligence such as complaints”². 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.
- 1.2 Governing bodies of universities also have a requirement to receive assurance that the University is meeting the conditions set out by regulatory and funding bodies. The CUC³ Code states: ‘The governing body needs assurance that the institution is meeting the conditions of funding as set by regulatory and funding bodies and other major institutional funders’.
- 1.3 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 2023/24 (see appendix 2). Where applicable updates on previously reported KPI’s⁴ are included in the report.
 - An update on the various consultations OfS have undertaken during 2023/24.
- 1.4 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 from a previous report, there will be no update reported.
- 1.5 Failure to comply with these ongoing conditions of registration will result in the OfS contacting the institution directly, which may then lead to a fuller review being undertaken by the OfS. Additionally, the OfS may also impose a monetary penalty to a provider if it appears to the OfS that they are in breach of the ongoing conditions of registration. Depending on the severity of the breach, the OfS may also determine to suspend or deregister a provider⁵.
- 1.6 The OfS have completed a number of quality assessments at higher education providers during 2023/24. Review reports following these assessments have been published by the OfS⁶ and a summary report was submitted to the College Education Committee at its meeting in January 2024 [CEC-24-01-31-17]. These reports provided providers who had not gone through a review, an opportunity to see what the review methodology entailed, and any themed concerns being raised. The assessments related to:

² Office for Students: Securing Student Success: Regulatory framework for higher education in England

³ Committee of University Chairs: <https://www.universitychairs.ac.uk/wp-content/files/2018/06/CUC-HE-Code-of-Governance-publication-final.pdf>

⁴ Key Performance Indicators

⁵ <https://www.officeforstudents.org.uk/publications/regulatory-advice-19-the-ofs-s-approach-to-determining-the-amount-of-a-monetary-penalty/>

⁶ Example of published report from OfS: <https://www.officeforstudents.org.uk/publications/quality-assessment-report-bsc-computing-courses-at-bradford-college/>

- The academic experience students are receiving: the quality of the learning, teaching and assessment they receive and
- Student outcomes: the rate at which students continue and complete their degrees, and their progression onto employment or further study.

1.7 The reports identified that those providers undertaking assessments had multiple visits to the provider and received multiple requests of information to aid the panel deliberations. Thus, if King's was chosen to have an assessment undertaken, the exercise can be expected to be a heavy burden of work to be completed.

1.8 Most assessments have resulted in agreement that providers are meeting OfS Conditions of Registration, but a couple of providers received areas of concern in their compliance (with most concerns aimed at B2: Resources, support and student engagement condition of registration). Specific concerns raised in these reports that King's should consider as part of the work being undertaken under Student Futures include:

- Providers processes for monitoring and action taken regarding attendance and engagement of their students.
- Staff resources available to ensure appropriate academic support is in place for all students (particularly those students who may require more support than others).
- The lack of consistency in providing timely feedback to students.

1.9 Additionally, in July 2024, the OfS published⁷ 11 case study reports from assessments completed as part of the OfS 2022/23 B3 Student Outcomes assessment cycle. These providers had performance that was below the OfS's numerical thresholds for student's outcomes. While King's was not part of these assessments completed, a summary overview of findings will be discussed in early 2024/25 at the Assessment and Regulatory Oversight Sub-Committee.

1.10 In July 2024 the OfS published new requirements for a new condition of registration that will be coming into existence in 1 August 2025. This condition of registration relates to protecting students from harassment and sexual misconduct. The OfS is giving universities a year to put in place appropriate steps to meet the new condition of registration. Work at King's has already started on this and an action plan has been submitted to the Vice Chancellor's Management Meeting and University Executive.

1.11 To assist the University with ensuring there is effective oversight of the Ongoing Conditions of Registration, particularly for the education area, an Education Governance review was completed during 2023/24, with College Education Committee [[CEC-24-05-22-16](#)] and Academic Board [[AB-24-06-26-03-7.3](#)] approving the revised structure for 2024/25 at its May and June 2024 meetings. The structure clearly lays out where responsibility for the Ongoing Conditions of Registration relating to B: Quality and Standards, and C: Protecting the Interests of Students resides, and this has been reflected in the table below.

2. OfS Oversight Committee

2.1 The University's OfS Oversight Committee continues to have oversight of OfS activity. The Committee has reviewed and where it was deemed appropriate⁸ inputted into the following consultations during the year:

⁷ <https://www.officeforstudents.org.uk/news-blog-and-events/press-and-media/ofs-publishes-assessment-reports-on-student-outcomes/>

⁸ For some consultations, following a review and potential responses to the consultation, agreement was had on responding via the Russell Group response, rather than submit a separate response from King's College London.

- Consultation on proposed new guidance on freedom of speech
- Update on theme measures, benchmarking and response thresholds in the NSS
- Consultation on proposed regulatory advice and other matters relating to freedom of speech
- Consultation on the OfS's new free speech complaints scheme
- Consultation on the OfS's approach to regulating students unions on free speech matters.

2.2 The OfS have also consulted during the year on a number of new names for some higher education providers. It was determined that King's would not participate in these consultations.

3. **Section A: Office for Students Ongoing Conditions of Registration**

3.1 The OfS regulatory framework⁹ 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].

3.2 The general ongoing conditions of registration are as follows, and the table indicates whether updates are required to be reported to Council and potentially OfS (if the updates necessitate a change in the information provided to the OfS as part of the initial registration process):

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
A: Access and participation for students from all backgrounds				
Condition A1: Access and participation plan	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	See appendix 1 to update on 2023/24 monitoring and APP renewal.	Student Experience Sub-Committee
Condition A2: Access and participation statement	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 	n/a	n/a	n/a as the University charges higher fee cap so no

⁹ Securing student success: Regulatory framework for higher education in England:
https://www.officeforstudents.org.uk/media/1406/ofs2018_01.pdf

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
	ii. participation statement. Update and re-publish this statement on an annual basis.			need for statement
B: Quality and Standards				
Condition B1: Academic Experience	<p>The provider must ensure that the students registered on each higher education course receive a high quality experience, ensuring the following:</p> <ul style="list-style-type: none"> • Each higher education course is up to date • Each higher education course provides educational challenge • Each higher education course is coherent • Each higher education course is effectively delivered and • Each higher education course, as appropriate the subject matter of the course, requires students to develop relevant skills. 	Y	See appendix 2 for update on how this was managed during 2023/24	Programme Development and Approval Sub-Committee and Quality Assurance and Enhancement Sub-Committee - reporting to College Education Committee
Condition B2: Resources, support and student engagement	<p>The provider must take all reasonable steps to ensure:</p> <ul style="list-style-type: none"> • Each cohort of students registered on each higher education course receives resources and support which are sufficient for the purpose of ensuring: <ol style="list-style-type: none"> i. A high quality academic experience for those students; and ii. Those students succeed in and beyond higher education; and • Effective engagement with each cohort of students which is sufficient for the purpose of ensuring: <ol style="list-style-type: none"> i. A high quality experience for those students; and ii. Those students succeed in and beyond higher education. 	Y	See appendix 2 for update on how this was managed during 2023/24	Assessment and Regulatory Oversight Sub-Committee, Quality Assurance and Enhancement Sub-Committee, and Student Experience Sub-Committee - reporting to College Education Committee

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
Condition B3: Student Outcome	The provider must deliver positive outcomes for students on its higher education courses.	Y	See appendix 2 for update on how this was managed during 2023/24	Assessment and Regulatory Oversight Sub-Committee - reporting to College Education Committee
Condition B4: Assessment and awards	<p>The provider must ensure that:</p> <ul style="list-style-type: none"> Students are assessed effectively; Each assessment is valid and reliable; Academic regulations are designed to ensure that relevant awards are credible; Academic regulations are designed to ensure the effective assessment of technical proficiency in the English language in a manner which appropriately reflects the level and content of the applicable higher education course¹⁰; and Relevant awards granted to students are credible at the point of being granted and when compared to those granted previously. 	Y	See appendix 2 for update on how this was managed during 2023/24	Assessment and Regulatory Oversight Sub-Committee - reporting to College Education Committee
Condition B5; Sector-recognised standards	<p>The provider must ensure that, in respect of any relevant awards granted to students who complete a higher education course provided by, or on behalf of, the provider (whether or not the provider is the awarding body);</p> <ul style="list-style-type: none"> Any standards set appropriately reflect any applicable sector-recognised standards; and Awards are only granted to students whose knowledge and 	Y	See appendix 2 for update on how this was managed during 2023/24	Programme Development and Approval Sub-Committee, Assessment and Regulatory Oversight Sub-Committee, and Quality Assurance and

¹⁰ Providers do not need to comply with this when a higher education course is assessing a language that is not English, or the provider is able to demonstrate to the OfS that the absence of assessing technical proficiency would amount to a form of discrimination for the purposes of the Equality Act 2010.

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
	skills appropriately reflect any applicable sector-recognised standards.			Enhancement Sub-Committee - reporting to College Education Committee
Condition B6: Teaching Excellence and Student Outcomes Framework participation	The provider must participate in the Teaching Excellence Framework and Student Outcomes Framework.	Y	See appendix 2 for update on how this was managed during 2023/24	College Education Committee
C: Protecting the interests of all students				
Condition C1: Guidance on consumer protection law	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	See appendix 3 for update on how this was managed during 2023/24	Programme Development and Approval Sub-Committee – reporting to College Education Committee
Condition C2: Student complaints scheme	<p>The provider must:</p> <ul style="list-style-type: none"> i. Co-operate with the requirements of the student complaints scheme run by the Office of the Independent Adjudicator for Higher Education, including the subscription requirements. ii. Make students aware of their ability to use the scheme. 	Y	See appendix 3 for update on how this was managed during 2023/24	Assessment Standards Sub-Committee, reporting to College Education Committee
Condition C3: Student protection plan	<p>The provider must:</p> <ul style="list-style-type: none"> 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 	Y	See appendix 3 for update on how this was managed during 2023/24	Programme Development and Approval Sub-Committee – reporting to College Education Committee

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
	<p>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>Inform the OfS of events, except for the closure of an individual course, that require the implementation of the provisions of the plan.</p>			
Condition C4: Student protection directions	<p>Student protection directions¹¹</p> <p>The provider must comply with any Student Protection Direction in circumstances where the OfS reasonably considers that there is a material risk that the provider will, or will be required by the operation of law to, fully or substantially cease the provision of higher education in England ("Market Exit Risk").</p>	Y	n/a	Programme Development and Approval Sub-Committee – reporting to College Education Committee
D: Financial sustainability				
Condition D: Financial viability and sustainability	<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 conditions of its registration.</p>	Y	See appendix 4	Finance Committee
E: Good governance				

¹¹ <https://www.officeforstudents.org.uk/media/2f006cca-162f-48a0-97c2-3e9fe8a4b255/regulatory-notice-6-student-protection-directions.pdf>

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
Condition E1: Public interest governance	The provider's governing documents must uphold the public interest governance principles that are applicable to the provider.	Y	n/a	Council and Academic Board
Condition E2: Management and governance	<p>The provider must have in place adequate and effective management and governance arrangements to:</p> <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. <p>Continue to comply with all conditions of its registration.</p>	Y	See appendix 4	Council, Academic Board and College Education Committee
Condition E3: Accountability	<p>The governing body of a provider must:</p> <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. <p>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.</p>	Y	n/a	Council and Academic Board
Condition E4: Notification of changes to the Register	The governing body of the provider must notify the OfS of any change of which it becomes aware which affects the accuracy of the information in the provider's entry in the Register.	Y	See appendix 4	Council and Academic Board
Condition E5: Facilitation of electoral registration	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	See appendix 4	Council and Academic Board

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
Condition F: Information for students				
Condition F1: Transparency information	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	See appendix 5	Council and Academic Board
Condition F2: Student transfer arrangements	The provider must provide to the OfS, and publish, information about its arrangements for a student to transfer.	Y	n/a	College Education Committee
Condition F3: Provision of information to the OfS	<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 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>The requirements in paragraphs (ii) and (iii) do not affect the generality of the</p>	Y	See appendix 5	Council and Academic Board

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates	Committee responsible for oversight from 2024/25
	requirement in paragraph (i).			
Condition F4: Provision of information to the DDB	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	See appendix 5	Data Governance Board
G: Accountability for fees and funding				
Condition G1: Mandatory fee limit	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/a	Finance Committee
Condition G2: Compliance with terms and conditions of financial support	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/a	Finance Committee
Condition G3: Payment of OfS and designated body fees	The provider must pay: i. It's annual registration fee and other OfS fees in accordance with regulations made by the Secretary of State. The fees charged by the designated bodies.	Y	See appendix 6	Finance Committee

4. Conclusion

- 4.1 Assurance can be given that King's continues to meet the ongoing conditions of registration of the Office for Students.
- 4.2 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.

Annexes to the report

[Annex 1](#) – Condition A update: Access and participation for students from all backgrounds

[Annex 2](#) – Condition B update: Quality and Standards

[Annex 3](#) – Condition C update: Protecting the interests of students

[Annex 4](#) – Condition E update: Good governance

[Annex 5](#) – Condition F update: Information for students

[Annex 6](#) – Condition G update: Accountability for fees and funding

Annex 1 – Condition A update: Access and participation for students from all backgrounds

- 1.1 In 2023/24 King's continued to deliver its current Access & Participation Plan (APP) covering 2020/21-202/25. We achieved the yearly milestones for this plan. The plan is approved and rolled over each year assuming that we meet targets and deliver the expenditure and activity we commit to in the plan. As such, the plan rolled over for the 2023/24 academic year, and was also approved for 2024/25.
- 1.2 We will be reporting back on our APP expenditure versus investment for 2023/24 part of the annual financial return in the autumn of 2024. Expenditure was in keeping with the forecast (~£12M).
- 1.3 Following the 2024/25 admissions cycle, we are on course to meet or exceed all APP targets relating to fair access and reducing the gaps in entry between students from the most and least disadvantaged areas of the country. Should any circumstances change during the academic year and/or subject to the monitoring completed for 2022/23, then the OfS can revisit this automatic renewal. If their view of the risk of meeting commitments has changed then they may be unable to approve the plan for a further year and a new plan would be required. This remains very unlikely.
- 1.4 During the course of the academic year, we were also required to submit a new Access & Participation Plan to the OfS, covering the period 2025/26-2028/29. The deadline for submission was end of May 2024. The APP was reviewed and approved by the OfS, with confirmation received in August 2024.
- 1.5 We will therefore be seeing out the delivery and reporting on the current APP while also laying the groundwork in 2024/25 for the next APP to kick in.
- 1.6 The new APP drafting was overseen by the newly appointed Academic Director, Student Success, with the Associate Director of Social Mobility & Widening Participation setting up working groups to review the requirements of the new APP and coordinate the submission.
- 1.7 As part of the next APP, we refreshed what King's defines as 'widening participation', with associated metrics and targeting criteria focussing on Free School Meals. We revised our approach to contextual admissions and offer-making given a more focused WP target. We reviewed our APP financial support (bursaries and hardship funds) to bring our provision up to date, to tighten targeting and increase the value of awards. We have also laid out a series of ambitious plans to increase the scope regional/national focus of widening participation activity, and how activity joins up to deliver student success from pre-entry, application/enrolment, transition and students' onward progression to the best outcomes. A new investment plan to achieve our stated aims was agreed.
- 1.8 The Associate Director of Social Mobility & Widening Participation has oversight of the APP. Reporting will be to the Academic Director, Student Success and the newly established Student Experience Sub-Committee. Decisions on specific areas will be taken at the appropriate level e.g., changes to contextual admissions will be overseen by the Marketing, Recruitment and Admissions Committee (MRAC) in the first instance.
- 1.9 In line with OfS requirements, the APP is hosted on King's website here:
<https://www.kcl.ac.uk/study/widening-participation/ofs>

Annex 2: Condition B update: Quality and Standards

- 2.1 This part of the ongoing conditions continues to be demonstrated by the OfS conducting desk-based research, using public information such as HESA data, OIA complaints data, and NSS results to assess whether we continue to meet their benchmarks.¹² If the OfS determine we are not meeting their benchmarks, or there is a concern in our meeting the conditions of registration, then there are a series of measures that the OfS may use. While it is assumed that we will not be required to hold a review in the immediate future regarding non-compliance with OfS conditions of registration, we continue to expect to hold a “readiness” check for the University’s Integrated Degree Apprenticeship: MSc Clinical Pharmacology, where the University is due to be the End-Point-Assessment for the apprenticeship, along with an Ofsted monitoring review to be undertaken. We await to hear on the timescales for both of these reviews.
- 2.2 The OfS continues to be the interim Designated Quality Body, following the QAA stepping down after 31st March 2023. During the course of the academic year, the OfS completed a number of quality assessments¹³ at higher education providers, using independent academic assessors to help them form a regulatory decision about a provider’s compliance with the OfS quality and standards conditions of registration. These academic assessors are expert practitioners drawn from a broad range of providers with varied subject specialist expertise.
- 2.3 Assessments were undertaken relating to the subjects Business and Management and Computing. Review reports following these assessments have been published by the OfS and a summary report was submitted to the College Education Committee at its meeting in January 2024 [[CEC-24-01-31-17](#)]. These reports provided providers who had not gone through a review, an opportunity to see what the review methodology entailed, and any themed concerns being raised. The assessments related to:
- The academic experience students are receiving: the quality of the learning, teaching and assessment they receive and
 - Student outcomes: the rate at which students continue and complete their degrees, and their progression onto employment or further study.
- 2.4 The reports identified that those providers undertaking assessments had multiple visits to the provider and received multiple requests of information to aid the panel deliberations. Thus, if King’s was chosen to have an assessment undertaken, the exercise can be expected to be a heavy burden of work to be completed.
- 2.5 Most assessments have resulted in agreement that providers are meeting OfS Conditions of Registration, but a couple of providers received areas of concern in their compliance (with most concerns aimed at B2: Resources, support and student engagement condition of registration). Specific concerns raised in these reports that King’s should consider as part of the work being undertaken under Student Futures include:
- Providers processes for monitoring and action taken regarding attendance and engagement of their students.
 - Staff resources available to ensure appropriate academic support is in place for all students (particularly those students who may require more support than others).

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

¹³ <https://www.officeforstudents.org.uk/for-providers/quality-and-standards/quality-assessments/> Information on the quality assessment completed and <https://www.officeforstudents.org.uk/for-providers/quality-and-standards/how-we-regulate-student-outcomes/assessment-reports/>

- The lack of consistency in providing timely feedback to students.
- 2.6 Additionally, the OfS completed Student Outcomes (B3) assessments with a number of providers who were deemed had performance below OfS numerical thresholds for student outcomes. The outcomes from these assessments was [published](#) in July 2024, and a summary report of these findings will be submitted to the Assessment and Regulatory Oversight Sub-Committee in early 2024/25, but there have been some providers, following this review, that were found to be in breach of condition of registration B3, and the OfS therefore require them to take further action to address these areas of increased risk.
- 2.7 In July 2024, the new Labour government, published a report following their own independent review of the OfS and announced that they will be proposing to not have a separate Designated Quality Body, with the OfS taking on this role permanently. The proposal also recommends that the OfS be given consumer enforcement powers. We await an outcome from these proposals, but these will have implications for all higher education providers.
- 2.8 The Quality Assurance Agency for Higher Education, while no longer the DQB for the OfS, have launched a revised [Quality Code](#) in June 2024. This revised code is being mapped against several regulatory requirements, including the OfS Conditions of Registration. The University will therefore be completing a mapping exercise of the revised Quality Code and identifying any gaps. These gaps will then feed into the Academic Quality Assurance refresh exercise that the new Director of Academic Quality will shortly be undertaking.
- 2.9 Assurance can be given that King's continues to review its quality assurance processes, ensuring compliance with external regulatory developments and the following work completed during 2023/24 demonstrates this commitment to continue to meet the conditions of Condition B: Quality and Standards for all students:

Condition B1: high academic experience

- 2.10 King's procedures, policies and regulations, alongside our services available to students, provide this high-quality academic experience for all our students, regardless of which level of study they undertake. For our validated provision, annual monitoring meetings and periodic programme reviews are held to review and confirm the quality and standards of the programme being managed by our partners, and we receive external examiners reports for all provision (including validated provision) providing us with additional assurance that our programmes continue to be up-to-date, provide an educational challenge, are coherent, effectively delivered and develop students in their chosen subject.
- 2.11 The following aids the University in meeting this condition:
- King's Academy provide training to staff to enable them to design module and programmes that are of a high quality and that the achievement can be reliably assessed. As part of the Academic Quality Assurance Refresh exercise discussions are being had with King's Academy on making a programme design workshop part of the approval procedures.
 - Our comprehensive procedures, policies and regulations provide a checking mechanism that our taught programmes (including apprenticeships) have this high-quality academic experience e.g. programme approval process with external input, annual monitoring, periodic programme review (with external input), external examiners. Programmes that are accredited by PSRBs will also have this checked via their re-accreditation visits/submissions, which have been reported to College Education Committee, but following an education governance review, will now report to the Quality Assurance and Enhancement Sub-Committee¹⁴.
 - When programmes are developed, they have to develop their programmes in accordance to:
 - Framework for Higher Education Qualifications (FHEQ)

¹⁴ Which is a sub-committee of College Education Committee

- Subject Benchmark Statements
- PSRB requirements (where applicable)
- QAA Characteristic Statements
- New research programmes are approved via Postgraduate Research Students Sub-Committee, with relevant academic expertise approving the programme.
- For PGR students: research skills courses are available to students throughout their study: <https://www.kcl.ac.uk/research/support/professional-development> thus assurance can be given that “coherence” section for PGR students is appropriate.
- Our University Marking Framework includes marking criteria that covers “technical proficiency in the English language” and our expectations, noting *Generic/Transferable Skills including Professional Competencies Employs a range of enabling skills and competencies, including: effective communication in a range of multi-media formats (including structure, accuracy of grammar and awareness of audience/genre within discipline-specific outputs)*. Additionally, we have high admission requirements for English language for our programmes.
- There is also a system in place to identify students with certain learning disabilities that may be impacted by this condition. Where students have self-declared with these learning disabilities, markers will then take this into consideration when they mark.

2.12 During 2023/24 the following work around education, to help provide our students with a high-academic experience and enable a student’s achievement to be reliably assessed in future year, were reported to College Education Committee and Academic Board (where appropriate):

- Updates were provided to the College Education Committee on the work King’s Academy have been doing regarding AI and its impact on teaching, assessment and feedback. [Guidance](#) has been provided to staff to support them adopt and integrate generative AI in their teaching, assessment and feedback. [Guidance](#) has also been provided to students. Additionally, a MOOC has been developed and launched. King’s has been at the cutting edge on the use of AI in education, and a teaching fund was set up earlier in the year for research projects that engages staff with student partners in exploring AI.
- A new framework for assessment and framework was developed, consulted and approved during the academic year. Transforming Assessment for Students at King’s (TASK) aims to reduce the overall workload (for students and staff) in response to clear and consistent feedback, to diversity assessment types so that students are not being repeatedly assessed on the same skills, to give students a clear sense of ‘fairness’ in the approach to assessment and feedback and to strengthen student voice and agency, as far as it is appropriate. The implementation of the framework was launched at the Education Conference in June 2024.
- The Mitigating Circumstances working group, established in 2022/23, continued its work and submitted a substantially revised Mitigating Circumstances policy to the May 2024 meeting of College Education Committee [\[CEC-24-05-22-18\]](#), and June meeting of Academic Board [\[AB-24-06-26-03iii\]](#). Student and staff guidance to accompany the revised policy has been written for 2024/25.
- Discussion was held on Education for Sustainability [\[CEC-24-03-20-10\]](#) where the aim is to equip all students with a basic level of sustainability literacy and the confidence to act as sustainability changemakers, which is increasingly expected by employers. The key education objective is that all King’s undergraduate students should have sustainability built into their core learning experience by 2026/27.
- An update was provided on the work underway to address the recommendations from the Higher Education Mental Health Implementation Taskforce. Part of this work included an institution-wide project to embed a student attendance system to support King’s to identify students who may be vulnerable.
- Updates were provided on the work being completed under TASKFORCE, specifically the Assessment Stabilisation Project, and the Progression and Award automation project, following revisions to the undergraduate progression and award regulations, introduced in 2022/23.
- Updates to the Core Code of Practice for Postgraduate Taught Research Governance and Dissertation Framework, Non-Academic Misconduct Policy, Suicide Safer University Policy, Library

and Collections Policy, Student Athlete Support Policy, Support for Students in the UK Armed Forces Policy, and a new Student Disability and Inclusion Policy were approved during the year.

2.13 For PGR programmes, to offer flexibility we continue to utilise the online viva examinations that was introduced due to the pandemic. Face-to-face examinations are on the rise while fully remote examinations have decreased. Hybrid examinations are used in emergencies. To ensure compliance supervisors are still required to complete the oral examination consent form before online or hybrid viva can take place.

Student's Academic Experience

2.14 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. The following outlines the response we had with these student surveys that ran during 2024:

Module Evaluations

2.15 College Education Committee received an overview report on how module evaluations had been run during 2023/24 [[CEC-24-07-03-14.1](#)]. Part of that report included a summary of results by theme, comparing 2022/23 vs 2023/24. The report highlighted that Teaching was the highest scoring theme across faculties for the past two academic years, whilst Assessment and Feedback has been the lowest (these findings are reflected in NSS and PTES results too). A year-over-year comparison shows that most faculties experienced an increase in scores for all themes in 2023/24 and for most faculties, satisfaction rates for each theme improved from 2022/23 to 2023/24. A full review of how the university undertakes module evaluations is being completed during 2024/25.

	Teaching			Assessment & Feedback			Academic Support			Organisation & Management			Learning Community			Learning Resources			Overall		
	22/23	23/24		22/23	23/24		22/23	23/24		22/23	23/24		22/23	23/24		22/23	23/24		22/23	23/24	
A&H	86%	87%	▲	77%	80%	▲	83%	86%	▲	83%	85%	▲	81%	84%	▲	84%	85%	▲	81%	84%	▲
CIEL	91%	96%	▲	87%	92%	▲	92%	95%	▲	88%	93%	▲	87%	92%	▲	81%	91%	▲	89%	93%	▲
NMPC	78%	82%	▲	68%	71%	▲	72%	79%	▲	76%	78%	▲	73%	77%	▲	72%	74%	▲	71%	75%	▲
FoDOCS	79%	82%	▲	63%	65%	▲	55%	61%	▲	82%	86%	▲	77%	84%	▲	60%	68%	▲	66%	73%	▲
FoLSM	79%	77%	▼	66%	62%	▼	70%	65%	▼	71%	69%	▼	66%	64%	▼	70%	67%	▼	72%	68%	▼
IoPPN	82%	84%	▲	72%	72%	▲	75%	78%	▲	76%	78%	▲	71%	75%	▲	76%	75%	▼	77%	79%	▲
KBS	85%	83%	▼	79%	78%	▼	83%	82%	▼	84%	83%	▼	81%	81%	▲	82%	81%	▼	82%	81%	▼
Law	84%	83%	▼	77%	76%	▼	80%	80%	▲	80%	78%	▼	79%	78%	▼	80%	78%	▼	83%	80%	▼
NMES	75%	78%	▲	70%	73%	▲	73%	75%	▲	73%	75%	▲	68%	71%	▲	72%	74%	▲	72%	75%	▲
SSPP	84%	85%	▲	78%	78%	▲	82%	82%	▲	81%	82%	▲	78%	79%	▲	80%	81%	▲	80%	81%	▲

National Student Survey (NSS) 2024

2.16 2024 was the second year running of the newly revised NSS. This allows the University to make comparisons with 2023 results, where it has been noted that our results are stable across the two years. However, other universities in the sector have increased (by just under a percentage point) which causes King's a comparative decrease. The majority of this year's NSS respondents are from the 2021/22 intake cohort, which due to the increase in top A level grades seen across the sector, King's very significantly overrecruited. However, some of the areas most affected by that over recruitment have seen the best results (King's Business School and Institute of Psychiatry, Psychology and Neuroscience). Therefore, despite the challenges created by large-scale unplanned over recruitment, student satisfaction has not been adversely affected, and in some areas has actually improved (Management Studies and Psychology).

2.17 From the results, the following is noted:

- Our position in the Russell Group has moved and we are ranked 22 out of 24 institutions (having been 19 out of 23¹⁵ in 2023).
- Our average positivity score has remained static at 75.5%.
- Organisation and Management theme saw the largest increase of 1.8% points to 68.5%. This increase was higher than the Sector or Russell Group improvements.
- Assessment and Feedback continues to be our lowest theme score, and 2024 saw the biggest drop of -1.8% points to 66.2%. This is -11.9% points below the sector, and has been largely driven by the Q13, *How often have you received assessment feedback on time?*, which had the largest negative year on year change for any question (-6.1% points). The new assessment framework (TASK, referenced in paragraph 2.12) aims to tackle this area and make improvements moving forward; however, it is doubtful results will be seen in 2025 as the framework will be phased in.
- Teaching and Learning, and Learning Resources continue to be areas of strength for King's. Teaching on my course scored 83.2%, while Learning Resources scored 84.8%. However, both areas are marginally down to both the Russell Group and the sector, with Teaching being -0.1 difference and Learning Resources being -0.3.
- Academic Support received 80.5%, however, the Russell Group scored 85.7% and the Sector 85.6%.
- This is the second year of having a question concerning Freedom of Expression, and we dropped 2.3% points from 2023, with 81% of our students feeling free to express their ideas, opinions, and beliefs during their studies. This was the lowest score in comparison with the Russell Group.
- King's Business School and the Institute of Psychiatry, Psychology and Neuroscience scored above the King's average in every section and were the highest scoring faculties in average score. Arts and Humanities, Life Science and Medicine, Institute of Psychiatry, Psychology and Neuroscience, and Natural, Mathematical and Engineering Sciences all saw an improvement in their average question score compared to last year.
- Arts and Humanities, Dickson Poon School of Law and Institute of Psychiatry, Psychology and Neuroscience scored above the Sector and Russell Group average for Teaching on my Course.
- Life Science and Medicine saw the biggest year on year increase in any one theme, with 7.1% points increase in Organisation and Management.
- The Faculty of Dental and Oral Craniofacial Sciences continue to be the faculty with the lowest results, and in relation to the average question score, saw a decrease of -4.1% points to 48.9%; however, the Dickson Poon School of Law saw the largest drop year on year, of -5.6% points to 75.1%.
- A new question, independent to King's, on the module information provided to students enabled them to make an informed decision when choosing their optional modules was added for 2024. Only 33% of students responded to this question, with Dickson Poon School of Law and Institute of Psychiatry, Psychology and Neuroscience scoring the highest results (86% and 85% respectively), with the Faculty of Dental and Oral Craniofacial Sciences scoring the lowest (38%). This question was put forward to help with the Curriculum Management project that is running under Student Futures.

2.18 In relation to how the OfS views the NSS results, institutions are given benchmarks to be assessed against. The following section indicates how King's data relates to the OfS benchmarks set.

2.19 The data provided by the OfS introduced summary of results by theme, with each theme given an overall positivity measure, a benchmark and whether we were above, inline or below that benchmark, as follows¹⁶:

¹⁵ Cambridge had no institutional data in 2023

¹⁶ None of our results meant we were above the benchmark

- Theme 1 Teaching on my course: 83.2% overall positivity result against a benchmark of 84.6%, resulting in us being broadly in-line with the benchmark. This is no change from the 2023 results.
- Theme 2 Learning Opportunities: 78.5% overall positivity result against a benchmark of 81.2%, resulting in us being in-line with the benchmark. While this theme saw a marginal increase in overall positivity (77.7% in 2023), the benchmark also had a marginal increase (80.5% in 2023).
- Theme 3 Assessment and Feedback: 66.2% overall positivity result against a benchmark of 74.5%. This results in not only the university being significantly below the benchmark, but the university also saw a decline in overall positivity (68% in 2023).
- Theme 4 Academic Support: 80.5% overall positivity result against a benchmark of 84.9%, resulting in us being slightly below the benchmark. While the university result isn't significantly different to 2023 (80.6%), the benchmark has increased by 2.2% points, thus suggesting the university is shifting downwards in terms of meeting the benchmark.
- Theme 5 Organisation and Management: 68.5% overall positivity result against a benchmark of 74.7%. While the university has seen an improvement in this result (66.7% in 2023), the benchmark has also increased (72.7%), thus we continue to be significantly below the benchmark.
- Theme 6 Learning Resources: 84.8% overall positivity result against a benchmark of 86.9%, resulting in the university being broadly in-line with the benchmark. This overall positivity result has seen a slight decrease from 2023 (85.1%), against the benchmark which saw a marginal increase (86.7% in 2023). This should therefore be kept under review, to ensure there is no further slippage.
- Theme 7 Student Voice: 67.9% overall positivity result against a benchmark of 73.6%, thus the university is below the benchmark. While the university saw an increase in its overall positivity from 2023 (66.5%), the benchmark has also increased (71.6%).

2.20 These results demonstrate that while the university has seen changes in its overall positivity results, due to the benchmarks also moving, the university has seen no change from 2023 in how the OfS perceives the university (in terms of NSS results). While we are therefore not any worse from 2023, we also haven't seen any improvements, but this is to be expected as the projects under Student Futures are likely not to see any benefits for another 2 – 3 years. Faculties have now produced action plans relating to the feedback received from students, and these plans are being discussed with the Senior Vice-President Academic and Vice-President Education and Student Success at their quarterly meetings with faculty staff.

2.21 The highest scores received in individual questions were:

- Q1: How good are teaching staff at explaining things? 89% (similar result to 2023, 89.7%)
- Q20: How well have the library resources (e.g., books, online services and learning spaces) supported your learning? 89.1% (similar result to 2023, 89.2%) and
- Q3: How often is the course intellectually stimulating? 86.8% (slight decrease from 2023, 87.3%).

2.22 The lowest scores received in individual questions were:

- Q24: How clear is it that students' feedback on the course is acted on? 52.8% (slight increase from 2023, 51.1%)
- Q14: How often does your feedback help you to improve your work? 60.1% (similar result to 2023, 60.7%)
- Q10: How clear were the marking criteria used to assess your work? 64.1% (slight decrease from 2023, 65.5%)
- Q17: How well organised is your course? 66.2% (improvement from 2023 by 2.2% points, 64.6%)

2.23 This is demonstrating, for another year, how poor our students experience is relating to assessment and feedback and organisation and management. Projects under Student Futures (Assessment and Feedback,

Curriculum Management etc) will aim to resolve these frustrations our students are experiencing but results from this work will not be realised for another few years.

2.24 There were a few questions where the university saw an improvement¹⁷ from 2023. There were:

- Q4: How often does your course challenge you to achieve the best work? 80.7% in 2024, compared to 79% in 2023.
- Q5: To what extent have you had the chance to explore ideas and concepts in depth? 81.9% in 2024, compared to 79.5% in 2023.
- Q7: To what extent have you had the chance to bring together information and ideas from different topics? 83.7% in 2024, compared to 81.9% in 2023.
- Q17: How well organised is your course? 66.2% in 2024, compared to 64.6% in 2023.
- Q18: How well were any changes to teaching on your course communicated? 70.9% in 2024, compared to 69.3% in 2023.
- Q23: To what extent are students' opinions about the course valued by staff? 70.3% in 2024, compared to 67.4% in 2023.
- Q24: How clear is it that students' feedback on the course is acted on? 52.8% in 2024, compared to 51.1% in 2023.
- Q26: How well communicated was information about your university/college's mental wellbeing support services? 72.9 in 2024, compared to 70% in 2023.

Postgraduate Taught Students Survey (PTES) 2024

Indicator	Result	Benchmark (average across Russell Group)	Benchmark against sector	RAG ratingⁱ
PTES 2021 overall satisfaction	71%	72%	78%	
PTES 2022 overall satisfaction	81%	81%	82%	
PTES 2023 overall satisfaction	83%	82%	87%	
PTES 2024 overall satisfaction	82%	82%	83%	

2.25 The 2024 PTES results show a slight decrease in satisfaction from 2023, however we are still above the satisfaction received in 2021 and 2022, and we have improved our satisfaction results in comparison to the sector, reducing the gap that we saw in 2023. The latest results show satisfaction increasing further for the majority of faculties and across significant sections of the survey including Teaching and Learning, and Resources and Services.

2.26 Relating to the survey themes:

- 7 out of 11 themes saw an increase in their % agree score between 2023 and 2024, with the largest increases being seen in Organisation and Management (+2.3% points), Students' Union (+2.0% points), and Dissertation or Major Project (+1.9% points). The Community theme, new for 2023, also saw an increase (+1.4% points).
- Student's Union and Community remain the university's lowest scoring themes, scoring 48% and 60% respectively.
- With the exception of Overall Satisfaction, the only decrease by theme were in Engagement (-0.2%) and Skills and Development (-0.4%).

¹⁷ Of more than 1% points

- The sections where King's achieves the highest levels of satisfaction continue to be Teaching and Learning, and Resources and Services.

2.27 Results by faculty and survey section continue to show some significant variance, none more so than the sections on Assessment and Feedback, and the section on Community. However, greater uniformity is seen in the faculty results for Teaching and Learning, Resources and Services, and Dissertation or Major Project. King's Business School and Life Science and Medicine both scored higher than or equal to the King's total score for very survey theme.

2.27 This year, the overall satisfaction score was the same for both on-campus students and distance learners (82%). However, the university has seen a year-on-year decrease for distance learners (-3% points), whereas Overall Satisfaction for on-campus students has remained level. When reviewing this split in faculties, 6 out of the 7 faculties with more than 25 distance learner responses have a higher % agree score from on-campus students. The work being completed in King's Digital to structure online programmes to a more balanced 3-term model (thus aiming to balance study and other commitments students may have), and the Student Futures projects, may resolve some of these frustrations our students are experiencing, but this should be kept under review as outcomes from this work will not be realised for a few years yet.

2.29 Following the trend over the past 5-years, non-UK students scored Overall Satisfaction higher than UK students, the score for both groups remain unchanged since 2023 at 83% and 81% respectively, with students from China & Hong Kong continuing to have the highest & agree score in terms of Overall Satisfaction, as they have since the domicile information was captured in 2021. Over time, the gaps between domiciles have closed.

2.30 There is no clear pattern in Overall Satisfaction over time when comparing the % agree scores for BME students and white students, when compared at the two-way split. BME students have given the Community theme a higher score than white students for the past two years that the question has been included and have also given a higher score to the Dissertation or Major Project, Organisation and Management, and Skills Development themes for all years between 2018 and 2024. Asian-Bangladeshi students have been the least satisfied ethnic group when looking at Overall Satisfaction between 2022 and 2023, but for 2024, Arab students have the lowest score (65%), with Asian-Indian students giving the highest Overall Satisfaction score of 88% - 9% points higher than last year.

2.31 The individual questions with the highest satisfaction rate continue to come from the Teaching and Learning and Resources and Services sections, with the top 5 scoring questions including:

- "Staff are enthusiastic about what they are teaching" with 92% (increase of 1% point from 2023).
- "There is appropriate access to online library resources" with 92% (decrease by 1% point from 2023).
- "Staff are good at explaining things" with 90% (same as 2023).
- "There is appropriate access to library resources" with 90% (increase of 1.1% points from 2023).
- "I have been able to access subject specific resources necessary for my studies when I am learning remotely" with 90% (increase of 1% point).

2.32 The questions with the lowest satisfaction related to the Students' Union, though all bar one question (which received same result as 2023) increased their positivity score by minimum of 2% points. The Community themed questions were next with lowest satisfaction, though they also saw an increase in positivity scores of minimum of 1% point (bar one question that received the same score as 2023).

Postgraduate Research Experience Survey (PRES)

2.33 The Postgraduate Research Experience Survey takes place every two years and is the only national survey. Due to the survey running in 2023, the next time the survey will run is 2025.

2.34 The Centre for Doctoral Studies (CDS) has been working with the key stakeholders this year to address issues raised by Doctoral students. Progress made today on key actions identified at the last report:

- Doctoral Student Development and Environment team have made significant changes to programme of induction and Welcome to make sure that it covers what students feel they need (based on feedback from a student focus group on induction). The induction's revised version will run in September 2024 and will have a follow-on series of webinars on key areas and support services that students, especially those from non-traditional backgrounds will benefit from hearing from and being able to engage and ask questions. These will be supported by a series of regular community events run in co-ordination with the King's Doctoral Student Association.
- Training and Development team added several workshops focused on data science and have recently reviewed those sessions after their first year of being run (details here: [A short report on the new Quantitative Methods courses - August 2024.docx](#)). All were broadly successful and will be repeated again in the coming academic year with some tweaks based on feedback from students who attended them.
- A series of focus groups was held across June 24 involving more than 90 students across eight individual sessions covering topics selected from key areas of interest pinpointed in the analysis of the PRES2023 results including on PGR community, creating an inclusive doctoral experience, induction and progression, supervision, what is/isn't part of being a PhD student and the international student experience

2.35 The Centre for Doctoral Studies required all faculties to submit action plans to address the feedback in PRES 2023 and highlight which specific areas they were going to focus on. CDS will review progress with faculties over the Autumn term to ensure that they are making progress ahead of announcing this as part of the PRES 2025 campaign.

Validated partners

2.36 When considering survey responses from our validated partners, we can report the following summary of results by theme, with each theme given an overall positivity measure, a benchmark and whether we were above, inline or below that benchmark, for RADA¹⁸:

- Theme 1 Teaching on my course: 96.3% overall positivity result against a benchmark of 89%, resulting in RADA being above the benchmark, and increased their positivity score from 2023 by 3.9% points, in comparison to the benchmark increasing by 0.3% points.
- Theme 2 Learning Opportunities: 92.4% overall positivity result against a benchmark of 85.5%, again resulting in RADA being above the benchmark, and increasing their positivity score from 2023 by 3% points, in comparison to the benchmark increasing by 0.5% points.
- Theme 3 Assessment and Feedback: 89% overall positivity result against a benchmark of 82.5%, resulting in RADA being above the benchmark, and increasing their positivity score by 7.9% points, in comparison to the benchmark increase of 0.1% point.
- Theme 4 Academic Support: 92.7% overall positivity result against a benchmark of 89.3%, resulting in RADA being above the benchmark, marginally increasing their positivity score by 1% point, in comparison to benchmark increase of 1.9% points.
- Theme 5 Organisation and Management: 57.3% overall positivity result against a benchmark of 69.9%. RADA continue to be below the benchmark for this theme; however, they have substantially increased their positivity score by 11.5% points, against the benchmark decrease of 1.9% points.
- Theme 6 Learning Resources: 65.9% overall positivity result against a benchmark of 79.4%. RADA continue to be below the benchmark for this theme; however, they have marginally increased their positivity score by 1.1% points, in line with the benchmark increase of 1.1%.

¹⁸ None of our results meant we were above the benchmark

- Theme 7 Student Voice: 75.6% overall positivity result against a benchmark of 74.4%, resulting in RADA being just above the benchmark. They have increased their positivity score by 5.2% point, in comparison to the benchmark increase of 2% points.

2.37 The highest score questions were:

- Q01: How good are teaching staff at explaining things? 100% (same as 2023)
- Q09: How well has your course developed your knowledge and skills that you think you will need for your future? 100% (increase of 5.6% points from 2023).
- Q02: How often do teaching staff make subject engaging? 97.6% (increase of 3.2% points from 2023)
- Q06: How well does your course introduce subjects and skills in a way that builds on what you have already learned? 97.6% (increase of 5.9% points)
- Q13: How often have you received assessment feedback on time? 97.4% (increase of 0.3% points)
- Q04: How often does your course challenge you to achieve your best work? 95.1% (increase of 6.2% points from 2023)

2.38 The lowest score questions were:

- Q19: How well have the IT resources and facilities supported your learning? 39% (an increase of 1.9% points from 2023)
- Q26: How well communicated was information about your university/college's mental wellbeing support services? 53.8% (significant decrease of -23.3% points)
- Q24: How clear is it that students' feedback on the course is acted on? 55% (increase of 3.6% points from 2023).
- Q17: How well organised is your course? 53.7% (substantial increase of 9.3% points from 2023)

2.39 2024 has seen substantial improvements in RADA's results, with the most substantial increase seen in Q18: How well were any changes to teaching on your course communicated, which in 2024 received a positivity score of 62.5%, which is a 15.3% point increase from 2023. However, care must be taken when considering these results, as RADA is a small institution with small cohorts of students, and therefore you would expect more targeted support to be given.

2.40 ICCA do not have any undergraduate programmes that King's validates so do not participate in the NSS.

PTES 2024

2.41 PTES is currently a voluntary survey so not all institutions participate in the survey, and this is the case for our validated partners: ICCA haven't as yet participated due to the timings of the surveys would have meant a small cohort would have been surveyed so the data would have been meaningless for them; and RADA have such small cohorts in their Masters programmes that they deem the data would be too small to be meaningful so do not participate in the survey.

2.42 At the annual meetings with both validated partners student feedback is an area discussed, and where the partner may not be participating in sector surveys, then other mechanisms for getting feedback are reviewed.

Condition B2: Resources, support and student engagement

2.43 Assurance can be given that King's adheres to this condition for all its programmes (taught and research), via the following mechanisms¹⁹:

¹⁹ The OfS notes that counselling and well-being are not included in this condition as these account for non-academic support.

- Personal tutors
- Supervisors
- Learning support via the library, disability team, including consideration of personalized examination arrangements
- Pre-sessional courses to aid with improving academic English language
- Careers and Employability
- Mitigating circumstances process
- Feedback policy
- For international students a student support service is available to them
- The widening participation team provides support to potential students who face barriers to enter higher education by equipping them with relevant skills
- IT resources
- Study spaces
- Centre for Doctoral Studies (PGR support)
- Research Skills Development team (PGR)
- Processes for managing student misconduct cases.

2.44 For those programmes with validated provision, resources and support available to students is considered as part of the approval of the validation, and then checked via annual meetings with the partner and via periodic programme review. At RADA's periodic programme review during 2023/24 the review panel praised RADA for its support to its students, noting the mechanisms are "exemplary" [\[CEC-24-03-20-19.1\]](#). The ICCA periodic programme review was also held in 2023/24, but the final report has yet to be submitted to the university.

2.45 For those programmes delivered with other partners e.g. joint/dual awards, the resource and support available are considered during the approval process of the partner and checked via periodic programme review, and the process for renewal of Memorandum of Agreement with the partner (every 5-years). During the course of some new programme approvals this academic year with partners in South Asia, specific questions were raised regarding the resources available to students, including the buildings being built to host the programmes [\[PDASC-23-12-06-03.1\]](#), [PDASC 24-07-10-3.1](#), and [PDASC-24-07-10](#)], thus demonstrating our due diligence with these collaborations.

2.46 Staff recruitment ensures that staff hold the appropriate qualifications to be academic staff, while also having a stringent promotions process considering experience and qualifications of staff too. Additionally, King's Academy run a [Learning and Teaching programme](#) for staff new to King's or who would like to develop their practice, as well as a [GTA Development programme](#) for graduate teaching assistants to become more skilled, knowledgeable, and confident in their teaching roles and responsibilities within King's. [CPD workshops](#) are also run throughout the academic year to improve staff knowledge and skills of research-enhanced pedagogic practices. For 2024-25 a [new induction programme](#) for new colleagues who will be involved in teaching has been developed, with two induction sessions being run in September 2024.

2.47 The revised OfS condition of registration has expanded its references on resources and support available to students and assurance can be given that King's covers the following examples cited by OfS:

- "Academic misconduct" includes presenting work for assessment that is not work of the student being assessed and includes but is not limited to the use of services offered by an essay mill. This is covered by the [Academic Misconduct Policy](#) and by the [Community Charter](#) that considered the [QAA Academic Integrity Charter](#), which King's signed up to in November 2020.
- Staff are appropriately qualified – which forms part of the job descriptions and is discussed during PDR's (see 2.46 above).
- Appropriate physical and digital learning spaces e.g. laboratory space, technical resources for subjects such as engineering, and performance space for subjects such as music. Included in this is the appropriate hardware and software for students to undertake and complete their studies, and reliable access to the internet, with a "robust technical infrastructure". As the University grows, its

estates is growing too and part of the [Campus Futures project](#) discussions are being had on appropriate physical learning spaces for students.

- Academic support for students including providing advice on future study choices on and providing support on placements.
- Support for students to avoid academic misconduct, along with advice about the consequences of academic misconduct. This is covered by the [Academic Misconduct Policy](#) and by the [Community Charter](#) that considered the [QAA Academic Integrity Charter](#), which King's signed up to in November 2020.
- Careers support for student including advice and guidance to help students identify their capabilities and the way in which these may be suited to particular careers.
- Research students have [training opportunities](#) to help develop their skills.

2.48 This condition also covers “engagement” and assurance can be given this is met via:

- Student reps are members of Faculty committees and they are representatives on Academic Board and its sub-committees. KCLSU sabbatical officers represent all students on those sub-committees stemming off of Academic Board and sit on Council too.
- Student's feedback is collated via: SSLC meetings, student forums, Students 100 panel (and Faculty equivalent), module evaluations, and national student surveys (NSS, PTES and PRES).

Condition B3: Student Outcomes

2.49 As part of the revised condition of registration for Student Outcomes, the OfS produces a set of indicators that providers are required to meet to demonstrate them meeting this specific condition of registration (the indicators relate to continuation, completion, and progression (that is students going into managerial and professional employment or higher-level study)). The OfS make a judgement that a provider has achieved positive outcomes for its students, if the provider's outcome data for each of the indicators and split indicators are at or above the relevant numerical thresholds set by the OfS. If a provider's outcome data is not at or above the numerical thresholds, the OfS will consider whether the context in which the provide is operating nevertheless justifies the provider's outcomes, in that they nevertheless represent positive outcomes for its students.

2.50 Currently this condition of registration excludes transnational education (TNE) programmes, so our programmes with international partners are currently outside this condition, however OfS are working towards including these programmes and a consultation is currently being undertaken, via HESA. The intended outcomes from the consultation are expected to be implemented for 2025/26.

Link to periodic programme reviews

2.51 In 2022/23 the University introduced a revised process for periodic programme reviews, allowing for early intervention if it is determined a programme/subject area is raising concerns regarding its data reported by the OfS via the B3 Student Outcomes dashboard and NSS/PTES results. However, at the October 2023 meeting of College Education Committee, a discussion was held on NSS/PTES strategy and further deliberations on how to manage early interventions are to be held during the Academic Quality Assurance refresh, as it is deemed that the University would unlikely fall foul of the OfS B3 Student Outcomes metrics, so how we should manage NSS/PTES results needs further consideration.

2.52 For 2023/24, analysis was undertaken following the publication of the Student Outcomes dashboard and was shared with Education Executive in January 2024 [EE-24-01-24-10], noting the following:

- King's is above or in line with OfS thresholds and weighted benchmarks for all student outcome measures across all full-time levels of study.
- For part-time students, King's is above or inline with OfS thresholds and weighted benchmark for most of the outcomes. PT Other UG students are below the threshold and weighted benchmark for continuation and completion – this is due to the HESA reporting mechanism for these programmes

rather than being a concern.²⁰ First Degree students are below the weighted benchmark (a shift from 2022).

2.53 In July 2024, the OfS published a revised set of B3 Student Outcomes. The analysis from this dashboard went to the September meeting of Education Executive for review [EE-24-09-17-10], including breaking the data down further by subject area, but assurance can be given that:

Full-time study

- Continuation: above the threshold for all categories.
- Completion: above the threshold for all categories.
- Progression: above the threshold for all categories.

Part-time study

- Continuation: above the threshold in all categories bar First Degree, where the university is within the threshold. This is an improvement from 2023 results.
- Completion: above the threshold for all categories, bar other UG where the university is below the threshold (as with previous years).
- Progression: above the threshold for all categories, where it is relevant.

Validated partners

2.54 Regarding King's validated partners, the dashboard²¹ notes the following:

Royal Academy of Dramatic Art (RADA)

- Continuation data is 100% above the threshold where able to be reported (some levels have too low denominator for there to be a threshold to meet).
- Completion data is above the threshold for Other UG and PG taught masters; but both have seen a dip (Other PG has seen a dip to 88.1% above threshold (in 2022 this was 100% and 2023 this was 99.1%), while PG taught master has dipped to 99.9%, from 100%).
- Progression data for Other UG is 100% above the threshold (an increase from last year where it was 96.7%), but for First degrees there is a split of 77.7% above the threshold (improved from last year's 59.7%) with 22.4% are below the threshold (again improved from last year's 40.3%) and this is due to the specialist nature of the programmes.

Inns of Court College of Advocacy (ICCA)

2.55 Due to the ICCA being fairly new in running their programmes the only data available for them on the dashboard relates to continuation and they are 100% above the threshold.

Graduate outcomes survey

2.56 The results for the Graduate Outcomes Survey (GOS) for the 2021/22 leavers are:

- 37.5% response rate, which is a 6% fall from the previous year, when it was 43.5%, placing us 9th in the Russell Group for responses. This reflects the broader downward trend in national response rates since the new format survey launched but is also a fall year-on-year in King's response. Part of the reason for this is that HESA/JISC, who run the survey nationally, have withdrawn from calling non-EU international graduates from the 20/21 cohort, which has led to a significant fall in response rates and has important implications for the accuracy and relevance of this data in a highly-internationally focused institution. This concern has been shared by numerous universities with

²⁰ These are free standing modules that due to how they are reported means we are below thresholds

²¹ Published 25th July 2024

HESA/JISC, however, the decision was ultimately made for cost-saving purposes. King's have recently become a signatory to an open letter to JISC regarding this concern.

2.57 Graduate Activities: Of the approx. 5,433 student who completed the survey:

- 88% of respondents are in a form of work or further study (including part-time), which is the same as the previous year's results.
- 61% are in full-time employment – up 1%, with 9% in full-time study (down 1%).
- 80% are in some form of paid or unpaid employment (up 1%).
- Unemployment is the same as the previous cohort at 5%, which is the same as the national average.
- There is an increase of 2% in responders undertaking both employment and further study simultaneously.

2.58 Skilled Work: Of all the GOS insights, highly-skilled employment (and particularly UG highly-skilled employment) data is the main metric taken forward into TEF, APP, and league table considerations:

- 90.08% of all respondents are in highly skilled work according to HESA SOC classifications, a decrease of 0.79% from the 20/21 graduating class, placing us 7th in the Russell Group.
- 85.77% of UG respondents are in highly skilled work, which is a decrease of 1.94% from the previous year.

2.59 Graduate Voice: Whilst graduate level employment can feel like an arbitrary classification, the Graduate Voice questions provide a deeper insight into graduates' own perspectives on their graduate situations:

- 87% of all respondents agreed or strongly agreed that their current activity is meaningful to them, which is the same as the previous year, down from an initial high of 89% in 17-18/18-19. However, this is up 2% on national average and places us =3rd in the Russell Group.
- 81% of respondents agree that their activity fits with future plans, which is down 1% from the previous year and altogether a 4% decrease from the initial 17/18 release. However, this remains 3% above the national average and places us =5th in the Russell Group.
- 69% of respondents have articulated that they are using what they learned during their studies. This is the same as the previous year, but a 3% fall from the initial 17/18 cohort, and remains 1% above the national average, placing us =8 in the Russell Group. In relation to this question, many universities, such as UCL, are taking an institutional approach to supporting academic teams to design and deliver curricula that supports employability development and potential careers pathways. UCL are joint 3rd in the RG for this, therefore, this may be something that King's would benefit from when exploring educational priorities.

Condition B4: Assessment and awards

2.60 Based on the examples provided by the OfS (that are not exhaustive), assurance can be given that King's meets the condition of registration as follows:

- "Academic misconduct" includes presenting work for assessment that is not the work of the student being assessed and includes, but not limited to, essay mills": student conduct and appeals have [processes and regulations](#) to cover this.
- "Assessed effectively": a course that is accredited by an PSRB and does not meet the requirements for assessment set by that body – PSRB accreditation reports provide this assurance, as do our External Examiner reports for all our taught programmes, including our validated partners – all of which are reported to College Education Committee²².

²² As evidenced by the reports available on the [College Education Committee SharePoint site](#)

- “Assessed effectively”: the standardised [marking criteria](#) ensures that all students are marked according to the same criteria, and External Examiners are utilised to check that there is no differentiation in how students work is assessed²³.
- Assessments are not designed in a way that allows students to gain marks for work that is not their own.
- Our selection of External Examiners for research degrees preserves our academic rigour.
- Assessments cover the things it is meant to assess e.g., they assess the modules learning aims and outcomes and do not concentrate on just the material covered at the end of the module. The [Transforming Assessment for Student’s at King’s \(TASK\) framework](#) will further enhance this condition.
- Our marking practices do not differentiate students work where the same achievement is evidenced.
- [Academic regulations](#) are in place to ensure our awards are fair and equitable for all students. Rarely are the regulations radically changed that would result in students being awarded a higher classification. Where a major change to the regulations is proposed, most notably the degree algorithm, then a mapping exercise is undertaken to confirm that the change will not result in advantaging or disadvantaging students (either past/current/future), and the new algorithm is kept under review to ensure there is no unseen consequence of the change – this is monitored via the Assessment and Regulatory Sub-Committee²⁴. A recent example of this monitoring is the recent report to the Academic Standards Sub-Committee on the implementation of compensation in year one of undergraduate degrees, and the change in condonement regulations in years 2 and 3 [[ASSC-2024-05-01-41](#)]. It was agreed that once the 2022/23 cohort has completed their full 3-year study a further review will be undertaken to understand whether the new regulations have resulted in a change of our awards profile.
- Our [marking framework](#) note how to take into consideration when marking students’ English language proficiency.

2.61 The OfS finally published in March 2024, [guidance](#) on retention of assessed work. The sector has been waiting for this guidance while the OfS’s Task and Finish Group reviewed the requirement and produced this guidance to the sector. In receiving the guidance a check was completed to ensure compliance, and it was confirmed that the existing [retention schedule](#) for the university was updated in 2022 and covered the period now required by the OfS. At the time the change was made, Faculties were communicated the change (as this was a substantial change to the previous retention schedule) and the records team continues to liaise with Faculties to help them implement the new rule. Central storage holds exam scripts, and digital assessments are held on KEATS. However, with the new guidance, it was determined that the retention schedule on exam attendance sheets and exam mark sheets will need to be increased to 5-years, and inclusion of assignment briefs or examination question papers needed to be added to the retention schedule – this has been completed.

2.62 To assist faculty staff who chair Assessment Board and Assessment Sub-Board a pilot was run early 2023/24 for training on all assessment matters, delivered by colleagues in King’s Academy and Academic Regulations, Quality and Standards. This training was also made available to external examiners. Resources were also made available to staff on the Academic Regulations, Quality and Standards SharePoint site, and work will continue in this area during 2024/25.

²³ Reported to relevant committees, including Academic Board

²⁴ Pre 2024/25 this was the Academic Standards Sub-Committee.

Awards review

2.63 King's keeps an overview of degree outcomes via its Assessment and Regulatory Oversight²⁵ Sub-Committee and an annual report on good honours degrees, and PGT awards, is submitted to the Committee for consideration.

UG:

2.64 The following table demonstrates how King's compares against the Russell Group:

Indicator	Result	Benchmark (average across Russell Group)	RAG rating ⁱⁱ
Percentage of good degrees 2019/20	91%	89.8%	
Percentage of good degrees 2020/21	90.9%	91.0%	
Percentage of good degrees 2021/22	88.9%	88.2%	
Percentage of good degrees 2022/23	86.2%	85.9%	

2.65 The table shows a continued downward trajectory of awarding good honours following the covid mitigations put in place, and a return to pre-pandemic levels of award (in 2018/19 86% of good honours was awarded). Some External Examiners have equated this to a return to in-person examinations.

2.66 During this academic year Faculty Assessment Boards have received data pertinent to their faculty to review and discuss²⁶, and an overall discussion was held at the Academic Standards Sub-Committee at its meeting in June 2024 [[ASSC-2024-06-12-56](#)], with the following noted:

- The proportion of first-class degrees awarded in 2022/23 decreased by 7.6% points when compared to the previous year (41.1% to 33.5%). This is a departure from the elevated rate of first-class degrees that began in 2019/20 during the pandemic and continued through the 2021/22 academic year. This year's awards of first-class degrees is more consistent with proportions seen in the years preceding the pandemic.
- The proportion of upper-second class degrees increased by 5.3% points from 2021/22 to 2022/23 (47.4% to 52.7%). This is more in-line with pre-pandemic levels.
- The combined proportion of first and upper-second class degrees (good honours) decreased by 2.3% points from 2021/22 to 2022/23, trending towards pre-pandemic levels.
- BME students were awarded 16% fewer firsts and 11% fewer good honours than white students. This is an increase in the university's attainment gap.

2.67 in light of the comments received by Academic Standards Sub-Committee in 2022/23, a working group was established this academic year to review the data sets currently available and identify any gaps in that data. Additionally, the group are reviewing potential KPI's to aid the monitoring of these awards and enable Faculty Assessment Boards to have fuller discussions on the data and identify any areas of risk. The findings from this working group will be reporting into the Assessment and Regulatory Oversight Sub-Committee²⁷ in early 2024/25.

²⁵ Previously Academic Standards Sub-Committee

²⁶ Receipt of this data was later than previous years however, due to some complications with the data being correct following changes to data gathering with Data Futures

²⁷ Previously titled Academic Standards Sub-Committee

Committee work relating to assessment

2.68 During 2023/24 the following assessment related work has been discussed at College Education Committee and Academic Board (where appropriate):

- Approved a revised Degree Outcome Statement, where the awards data was updated²⁸ in May 2024 [[CEC-24-05-22-26.3](#)].
- Discussed and approved the new assessment framework for the university: Transforming Assessment for Students' at King's (TASK) [[ASSC-2024-05-01-40](#) and [CEC-24-05-22-26.3](#)]
- Approved revised mitigating circumstances policy [[ASSC-2024-05-01-49](#)].
- Reviewed the first year of implementation of the compensation regulation for first year undergraduate students [[ASSC-2024-05-01-41](#)]. It was agreed that a full review of the new regulations implemented in 2022/23 should be completed in 2025/26.
- Approved revisions to the Academic Regulations [[ASSC-2024-05-01-43](#)], including the emergency regulations following a working group reviewing the current emergency regulations, deliberating how well they worked during the recent pandemic and industrial action and making suggestions where more transparency was felt was required [[ASSC-2024-05-01-47](#)] and [[AROSC-2024-09-11-08](#)].
- Updates were provided on the review of the University Marking Framework, following its revised implementation in 2023/24. The review is still being completed and will be reported to an early meeting of the Assessment and Regulatory Oversight Sub-Committee in 2024/25.

Assessment Working Group

2.69 During 2023/24 the Assessment Strategy Implementation Board continued to meet, under the leadership of Dr Jayne Pearson, Academic Lead for Assessment, and Senior Lecturer in Education (King's Academy). The work discussed during 2023/24 included:

- Demonstration of a new assessment platform (CADMUS) that is to be piloted during 2023/24.
- Received updates on the process for Personalised Assessment Arrangements (PAA) and King's Inclusion Plan (KIP).
- Discussion of the new assessment framework: Transforming Assessment for Students' at King's (TASK).
- Update on the Examenia pilot (online examination platform).
- Update on implementation on Rubric Champions in faculties.
- Reflected on the Continuous Enhancement Review process in relation to reporting against assessments.

PGT:

2.70 The following table demonstrates PGT awards²⁹:

Indicator	Merit and Distinction Awards ³⁰
Percentage of awards 2022/23	86.9%
Percentage of awards 2021/22	90.3%
Percentage of awards 2020/21	89.5%

²⁸ The more substantial review was completed during 2022/23

²⁹ Previous reports have noted live award data. The table this year has been updated to reflect HESA data, as this is more stable award data to note

2.71 The awards for 2022/23 demonstrate, as with undergraduate awards, a return to pre-pandemic levels. Some of this is likely to be linked to the return of practice where postgraduate taught programmes do not have a 2% borderline rule (which was used in recent years to mitigate against the pandemic), thus demonstrating how much this borderline result increased the university's awarding of merits and distinctions during the pandemic.

PGR

2.72 For 2020/21 -2023/24 the following table demonstrates PGR awards:

	2020/21	Presented as % of overall awards	2021/22	Presented as % of overall awards	2022/23	Presented as % of overall awards	2023/24	Presented as % of overall awards
Final Awards	568		627		704		732	
First Time Passes	129	23%	167	27%	144	20%	110	15%
One Month Corrections	13	2%	10	2%	18	3%	21	3%
Minor Corrections (3 months)	337	59%	405	65%	484	69%	490	67%
Major Corrections (6 months)	70	12%	81	13%	95	13%	114	16%
Re-examination (18 months)	17	3%	12	2%	14	2%	18	2%
MPhil Recommended	1	0%	6	1%	4	1%	5	1%
Academic Fails	1	0%	2	0%	1	0%	0	

2.73 Although we do not have a benchmark comparison with the Russell Group, we are pleased to report that the rate of first-time passes and minor corrections (which we consider positive outcomes) remains high. The number of awards processed has also increased, partly due to COVID-related extensions for final-year students, but also due to increased recruitment in this area.

Validated partners

2.74 The following outlines the awards King's has granted under our validated provision (noting that both validated partners have their own set of regulations, including degree algorithms, that King's approves on an annual basis, but are therefore a different set of regulations to King's so there can be no comparison to King's own programmes):

RADA

CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/22	2022/3	2023/4	Grand total
Theatre Costume	2018/9	PD	3							3

CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/22	2022/3	2023/4	Grand total
		PM	1							1
	2020/1	PD		4	3					7
		PM			1					1
	2021-2	PD				1				1
		PM				1				1
	2022-3	PD					2			2
		PM					1			1
	2023-4	PD						0		0
		PM						4		4
Theatre Costume Total			4	4	4	2	3	4		21
Theatre LAB	2018/9	P	15							15
	2019/0	P		17						17
	2020/1	P	1		16					17
	2021/2	P			1	17				18
	2022/3	P					18			18
	2023/24	P						18		18
Theatre LAB Total			16	17	17	17	18	18		103
ACTING³¹	2018/9	P								0
	2019/0	P	25							25
	2020/1		1	27						28
	2021/2		2		23					25
	2022/3			1	3	15				19
	2023/4				2		25			27
ACTING Total			28	28	28	15	25			124
FdA Technical Theatre and Stage	2018/9	P	5							5

³¹ This is the only UG award of RADA and is only Pass/Fail – no classifications are awarded

CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/22	2022/3	2023/4	Grand total
Management										
		PD	10							10
		PM	17							17
	2019/0	P		4						4
		PD		13						13
		PM		16						16
	2020/1	P		1	3					4
		PD			1					1
		PM			23					23
	2021/2	P			2	4				6
		PD				3				3
		PM		1		9				10
	2022-3	P				2	8			10
		PD					5			5
		PM			1	1	14			16
	2023-4	P						3		3
		PD						3		3
		PM					1	17		18
Technical Theatre and Stage Management Total			32	35	30	19	28	23		167
BA Technical Theatre and Stage Management	2018/9	P		1						1
		PD		10						10
		PM		7						7
	2019/0	P								0
		PD		1	14					15
		PM			10					10
	2020/1	P				1				1
		PD				13				13

CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/22	2022/3	2023/4	Grand total
		PM				12				12
	2021/2	P				1	5			6
		PD					6			6
		PM					13			13
	2022-3	P						1		1
		PD						6		6
		PM					1	12		13
	2023-4	P							1	1
		PD							2	2
		PM							15	15
BA Technical Theatre and Stage Management Total			17	19	24	27	26	19	18	133
Grand total			97	103	103	80	100	64	18	548

2.75 From the above you can see, where the awards are available, the majority of students are awarded a Pass with Merit or Pass with Distinction, with a smattering of students receiving just a Pass. Bearing in mind these are specialists programmes, with small cohorts of students, the awards are as expected, and External Examiner reports provide this assurance as well.

2.76 In explaining some of the differences found in recent years awards the following is noted:

- In 2018/19 RADA updated their marking scheme for the Foundation Degree in Technical Theatre and Stage Management, BA in Technical Theatre and Stage Management and the PgDip in Theatre Costume.
- 2018-2019 was also the first year the 2-point discretionary uplift was removed for the BA Technical Theatre Stage Management programme, this was returned for the Covid Years, and returned to no uplift allowed from 2021-2022.

ICCA

2.77 This validated provision only commenced in 2020/21 and therefore there is only three years of awards we can note:

	March 2021 (awarded September 2021)	September 2021 (awarded March 2022)	March 2022 (awarded September 2022)	September 2022 (awarded March 2023)	March 2023 (awarded September 2023) ³²	September 2023 (awarded March 2024)
Part Two Enrolment	37	21	52	23	81	34
Interrupted Studies	2	0	0	0	2	2
Complete - Distinction	2	5	8	3	8	3
Complete - Merit	29	13	35	8	55	23
Complete - Pass	4	1	8	11	12	5
Complete - Fail	0	2	0	0	0	0
NA - Resits Pending	0	0	1	1	N/A	N/A

2.78 A similar picture can be found with these awards, with the majority of students receiving a Pass with Merit or Pass with Distinction. This programme is also a specialist programmes, with currently small cohorts of students, so the awards are as expected. With the increase in student numbers (which is expected to continue), the award profile will be kept under review.

External examiners

2.79 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 2022/23		RAG rating
Undergraduate		
Percentage of External Examiner reports received ⁱⁱⁱ	98% ³³	
Percentage of External Examiners who had received an induction ^{iv}	72% ³⁴	
Confirmation of assurance that academic standards are met ^v	83%	
Percentage of external examiner reports which include a concern on academic	17% ³⁵	

³² For March 2023 and September 2023, we have counted number of students that enrolled onto Part Two teaching. Not all of these students received their award after the subsequent assessment period (as they were required to complete resits) and some resitting students received their awards alongside these cohorts. This accounts for the difference between the number of students enrolled and the number of students listed as 'Complete'.

³³ This is an improved response rate to the previous year, where we had 92% reports submitted

³⁴ In checking with faculties those External Examiners who noted they had not received an induction, faculties confirmed this had in fact occurred, so this is a misunderstanding of External Examiners of what is their induction. Clearer communication to our External Examiners on induction is therefore required.

standards ^{vi}		
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC ^{vii}	74% ³⁶	
Postgraduate		
Percentage of external examiner reports received ^{viii}	89% ³⁷	
Percentage of external examiners who had received an induction ^{ix}	79% ³⁸	
Confirmation of assurance that academic standards are met ^x	94%	
Percentage of external examiner reports which include a concern on academic standards ^{xi}	6% ³⁹	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC ^{xii}	33% ⁴⁰	

2.80 There have been some significant drops in RAG ratings relating to External Examiners raising concerns on academic standards and in faculties not responding to these critical comments (particularly for PGT reports). Those concerns regarding academic standards largely came from those External Examiners whose programmes were involved in the Marking and Assessment Boycott in the summer of 2023. However, assurance can still be given though that 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*.

2.81 Of those external examiners whose 2022/23 reports noted comments impacting academic standards, no one required a separate letter to the external examiner from the Chair of Academic Standards Sub-Committee⁴¹ (ASSC).

2.82 General themes across 2022/23 external examiner reports were:

- Volume of marking (recurring theme).
- Increased workload due to the increase in student numbers.
- Timely provision of paperwork for Assessment Sub-Boards (recurring theme).

³⁵ Those concerns raised are noted below via the general themes summarised in overall reports submitted to the University during 2022/23.

³⁶ This is lower than previous years. The ARQS team will be working on improving this response rate during 2024/25

³⁷ This is an improved response rate from the previous year, but more can be done to get all reports submitted

³⁸ In checking with faculties those External Examiners who noted they had not received an induction, faculties confirmed this had in fact occurred, so this is a misunderstanding of External Examiners of what is their induction. Clearer communication to our External Examiners on induction is therefore required.

³⁹ Those concerns raised are noted below via the general themes summarised in overall reports submitted to the University during 2022/23. This is improved from the previous year.

⁴⁰ This is significantly lower than previous years. The ARQS team will be working on improving this response rate during 2024/25

⁴¹ Now the Assessment and Regulatory Oversight Sub-Committee

- Quality and consistency of feedback (recurring theme).
- Standardised method to demonstrate how marking is agreed (recurring theme).
- Emphasis to ensure timely reminders are sent to external examiners and faculties regarding submission of annual reports.
- Limitations of KEATS.

2.83 A number of these themes regularly occur in external examiner reports and the new assessment framework (TASK) should resolve some of those concerns (volume of marking, increasing workload, standardised moderation process), while the recent Assessment Stabilisation project, under Taskforce⁴², should resolve the concerns raised on timely provision of paperwork for Assessment Sub-Boards.

2.84 The Academic Regulations, Quality and Standards team are working on the following recommendations that were agreed as part of aiming to resolve those concerns raised, with an update to be presented to the Assessment and Regulatory Oversight Sub-Committee in early 2024/25:

- Review the external scrutiny requirements for 1st year assessments that no longer contribute to the C Score. The objective is to reduce the workload burden internally and externally whilst retaining a level of oversight.
- Review the scrutiny process of External Examiner reports to make it more streamline and establish an agreed timeline of when to engage External Examiners to allow sufficient time for them to carry out their duties.

2.85 Meetings have been held with the University Chief and all Faculty Chief External Examiners during the year, and reports have also been submitted to the Academic Regulations, Quality and Standards team, where an overview report went to the first meeting of the 2024/25 academic year of the Assessment and Regulatory Oversight Sub-Committee [[AROSC-2024-09-11-07.1](#)] and [[AROSC-2024-09-11-07.2](#)]. The annual report received from the University Chief External Examiner in July 2024 noted:

- There have been opportunities to extend involvement beyond attending Academic Standards Sub-Committee meetings, including attending the new Assessment Workshop for examiners and Faculty Chairs, and reviewing the emergency regulations proposals.
- As these Faculty Chief External Examiner roles become more established (this was their 2nd year of being in post), there is much more contact with Faculty Assessment Boards, and all Chief External Examiners were positive about the conduct of these Boards, reporting them to be running efficiently and effectively.
- A common issue raised in Faculty Chief External Examiner reports relate to the challenges experienced this year with getting data to look at key issues such as the degree awarding gap and potential grade inflation. This issue is known and is due to the changes in the way the HESA data is being recorded now, and getting corrected data to faculties is being addressed by the Academic Regulations, Quality and Standards team.
- A SharePoint site has been established to share information, including these annual reports, with all Faculty Chief External Examiners. This has been welcomed by all involved.
- Evidence in the Faculty Chief External Examiner reports and own observations through attending meetings and working with staff suggests that King's is very effective in its processes to monitor, maintain and reflect on academic standards and is compliant with the legislative framework.
- King's continues to be proactive in the way that it trains and develops external examiners in order to ensure that standards are consistent with the sector and externally validated.

⁴² Part of Student Success Transformation Programme

- General concern on the reporting rate of programme external examiners, which while is improving, when programmes do not receive a report from an external examiner this leads to some uncertainty in the external validation of standards for this programme. This concern is reflected in the annual summary reports that were discussed at the Academic Standards Sub-Committee during the year, and which 2.85 illustrates the action being taken to address this.
- All of the Faculty Chief External Examiners reported that the standards in each Faculty were consistent with the sector and with QAA benchmark discipline statements or Professional, Statutory and Regulatory Body (PSRB), where these applied.
- Faculty Chief External Examiners reported that they considered that Faculties had good marking practices and worked hard to maintain standards. Stepped marking was reported to being embedded across most Faculties and there was no evidence that this was leading to grade inflation.
- It is evident from the policy documents that have been brought before Academic Standards Sub-Committee that processes to ensure consistency, rigour and fairness are constantly reviewed and developed. There is clear guidance around marking and the training needed to support GTA markers; mitigating circumstances are clearly monitored at University and Faculty level; there are developments taking place around assessment rubrics that are specific to the assignments set for each module; processes around the administration of formal examinations are monitored and reviewed; and consideration is being made to alternative assessment arrangements. There are clear attempts to reach out to colleagues across the sector and this has been facilitated in part through the Faculty Chief External Examiner network. In all there is a lot of energy and commitment from staff at King's to constantly reflect and improve on processes.
- Faculty Chief External Examiner reports indicate that grades in each Faculty are starting to return to pre-pandemic levels. The overall pattern for King's follows the sector changes, however, the number of good degrees awarded at King's is higher than the sector. There is also variation between Faculties at undergraduate level within King's ranging from 25% (Faculty of Dentistry, Oral and Craniofacial) to 46% (Institute of Psychiatry, Psychology and Neuroscience). Recommendations have been put forward for King's to review in light of this e.g., is the difference because of programme design, quality of teaching, support for students etc? can the variation in the number of Firsts awarded by different Faculties be explained? Etc. These will be discussed at the Assessment and Regulatory Oversight Sub-Committee during 2024/25.
- The number of Mitigating Circumstances reduced during 2022/23 compared to the previous year, both in terms of the number of mitigation circumstance requests and the number of students making these requests. More than half of the requests come from just two Faculties. The number of Mitigating Circumstances was commented on in Faculty Chief External Examiner annual reports and during the Chief External Examiners meeting. There were concerns raised about the implications of this on staff workloads.

Condition B5: Sector-recognised standards

2.86 All King's programmes adhere to the *Framework for Higher Education Qualifications* (FHEQ), QAA Subject Benchmark statements etc, and this adherence is checked by Faculties via the use of external subject experts at the time the programme is given final approval, and via programme review. Guidance on this can be found in the Quality Assurance Handbook⁴³. Additionally, external examiners (programmes and Chiefs) confirm in their annual reports that the programme under review adheres to these sector-recognised standard (see paragraph 2.85).

⁴³ <https://www.kcl.ac.uk/governancezone/governancelegal/quality-assurance-handbook>

2.87 For research students, approval of new research degrees goes through Postgraduate Research Students Sub-Committee and again takes into account sector-recognised standards such as the FHEQ. External Examiners are appointed at the point of the thesis submission and viva, providing assurance to the University that the award being granted is of an appropriate standard.

2.88 Periodic programme reviews provide us with continued assurance that our programmes meet sector-recognised standards. External Peers (and External Specialists on some reviews), sit on our programme review panels to give us this assurance. Programme review reports are submitted to Faculty Education Committee and College Education Committee for review.

Condition B6: Participation in the Teaching Excellence Framework (TEF)

2.89 In September 2022 the OfS launched the 2023 revised Teaching Excellence Framework (TEF)⁴⁴. The TEF data dashboard was published September 2022, with the guidance document (including the student guidance document) released October 2022.

2.90 King's was advised of its final results on 19th September 2023, as follows:

- Overall award: Silver
- Student experience award: Silver
- Student outcomes award: Gold

2.91 For the overall award, the panel noted that for the majority of our provision the evidence identified Very High quality and Outstanding quality features, even with the indicators contributing no more than half of the evidence of excellence. The panel considered the ratings for the Student Experience and Student Outcomes and considered all the evidence across all features and across all our student groups, subjects and programmes, to come to a "best fit" decision as overall Silver.

2.92 For Student Experience, the panel found the majority of features to be Very High quality, and one feature (learning resources) as Outstanding feature. The panel note that we are on a transition to better embed and tailor our approaches to improving the student experience, but we have yet to demonstrate that improvement.

2.93 For Student Outcomes, the panel found the majority of the features are Outstanding quality for most of our students and programmes, and therefore felt that "Silver" was not the "best fit" because the evidence demonstrates that only one Student Outcome feature is of Very High quality (progression rates).

2.94 These awards will remain for the next 4 years, which is when the next TEF exercise is due. In the meantime, the work being completed under Student Futures,⁴⁵ including the TASK framework, will aim to improve our student experience, thus aiming to improve our NSS scores in assessment and feedback, organisation and management, and academic support in preparation for the next iteration of the TEF.

⁴⁴ Previously called the Teaching Excellence and Student Outcomes Framework

⁴⁵ Previously Student Success Transformation Programme

Annex 3: Condition C update: Protecting the interests of students

- 3.1 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

- 3.2 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.
- 3.3 **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.
- 3.4 The General Terms and Conditions are reviewed annually with the General Counsel. The revised Terms and Conditions were approved by Academic Board at its meeting in June 2024 [AB-24-06-26-05.3], and take account of the revised consumer law guidance issued by the UK's Competition and Markets Authority and the Chair of Academic Board approved these revisions in October 2023.⁴⁶
- 3.5 General information about the experience and status of staff is publicly available on the King's website.
- 3.6 Student Ambassadors are recruited annually for Open Days. This process is centralised and coordinated by the central Marketing team. For both on-campus and virtual events, training is provided to ensure everyone is 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.
- 3.7 **Fees:** King's is fully compliant with regard to fee publication. For prospective students, fees are published on course webpages. Students are notified on how to access information on fees three months before they are due to enrol for their next year of study. A Fees and Studentship Committee has been established with the aim to provide greater consistency and clarify on fees too.
- 3.8 **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 Student Consumer and Protection Board by the Associate Director (Student Conduct and Appeals). All timeframes, practices and principles recommended by the OIA are embedded within King's procedures and detailed in the academic regulations.
- 3.9 Any issues falling within the remit of the Advertising Standards Authority are routed through the Marketing team, but the Student Consumer and Protection Board have oversight of any formal complaints.

⁴⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1159885/Consumer_law_advice_for_higher_education_providers_.pdf

Student Consumer and Protection Board

- 3.10 The Student Consumer and Protection Board has continued to meet during 2023/24, reporting into the Programme Development and Approval Sub-Committee. The Board has met twice and reported updates to the Programme Development and Approval Sub-Committee [[PDASC-23-10-18-17](#) and [PDASC-23-06-05-07](#)].
- 3.11 At its meeting in October 2023, the Board were advised that the Student Conduct and Appeals team had identified a training need to ensure staff understood what constitutes a CMA-related issue. The Academic Regulations, Quality and Standards team developed during the academic year a CMA training workshop for staff to attend. The first workshop was held on 13th June 2024 with Faculty Quality Assurance Managers.
- 3.12 At its meeting in May 2024, the Board were advised that the admissions team were reviewing the information held on King's website to ensure that information is clearer to students in relation to timelines for application processes for specific faculties, as well as an admissions journey video. The Board were also advised of a number of complaints received relating to the Marking and Assessment Boycott, but these complaints had a hint of CMA risks. An update on these complaints will be going to the October 2024 meeting of the Board.

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

<i>Complaints and Appeals 2022/23</i>	<i>RAG rating</i>
Compliance with the OIA's good practice framework: handling student complaints and academic appeals	
Average time taken to turnaround complaints and appeals ^{xiii}	47
Number of complaints escalated to the OIA	48
Number of complaints escalated to OIA that were not justified (benchmarked against the sector)	49

Academic Appeals

- 3.13 The numbers of Stage 1 Appeals slightly decreased to 2574 cases compared to 2794 in the previous year. It is believed the slight decrease may be due to no industrial action during this academic year. It is recommended that the numbers are reviewed in light of the work that has been undertaken by the

⁴⁷ Academic Appeals. Regulatory timeframe for Stage 1: 42 days, average case turnaround time for Stage 1 (2574 cases): 42 days. Regulatory turnaround time for Stage 2: 42 days, average case turnaround time for Stage 2 (22 cases): 52 days. Complaints. Regulatory timeframe for Stage 2: 35 days, average case turnaround time for Stage 2 (523 cases including MAB related complaints and 100 other complaints): 201 days. Regulatory timeframe for Stage 3: 28 days, average case turnaround time for Stage 3 (21 cases): 37 days

⁴⁸ 40 cases were reported to the OIA in 2023/24. This is above the median for the number of complaints expected for universities within the same band as King's which is 31.

⁴⁹ The benchmark for the sector is 22 Not Justified and Kings is 22 Not Justified, with 2 withdrawn and 11 to be concluded. King's had no justified complaints and 1 Partially justified and 2 Settled.

Taskforce and is continuing to take place under Student Futures to make improvements to assessment systems and processes.

- 3.14 The changes to the Stage 1 Academic Appeals process with the introduction of a Teams Channel to share appeal submissions, an Outcomes Tracker tool for the whole process and a process flow within Teams has been successfully implemented and has helped make improvements to the process. An automated workflow system similar to the one used by the mitigating circumstances process has now been developed and is currently being tested in small groups of stakeholders with plans to pilot it for Assessment Period One in 2024/25.

Complaints

- 3.15 The delays in turnaround times for complaints are likely to be due to of the complex Marking & Assessment Boycott complaints which we have received (with 423 outcomes sent) as well as the number of complex sensitive bullying and harassment related cases which require a lengthier investigation. For Stage 3 Complaints the delays are again due to the complexity of the cases which has resulted in lengthier investigations as well as due to overall number and complexity of cases for the team in all processes.

Office of the Independent Adjudicator (OIA)

- 3.16 There has been an increase in the number of cases sent to the OIA this year compared to last year (40 compared to 24) and it is now above the median for universities of a similar size (which is 31). However, the number of complaints that were not justified was the same as the median for the sector, and there were no cases in which the OIA found complaints were justified which is a testament to Student Conduct & Appeals work to ensure the good practice framework principles are followed in cases as well as according to University regulations.

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

- 3.17 During 2023/24 a review was undertaken of the Student Protection Plan, as it hadn't been reviewed for a while. The Student Consumer and Protection Board approved the proposed revisions at its meeting in May 2024, and the revised Student Protection Plan was approved by the Academic Board at its meeting on 26th June 2024 [[AB-24-06-26-05.4](#)], and then subsequently Council at its meeting on 10th July 2024. The revised plan was submitted to the OfS in July 2024, along with the separate Student Protection Plan for the Joint Education Institute (JEI) established as part of the partnership King's has with SUSTech.
- 3.18 In line with OfS requirements, the Student Protection Plan is available online at: <https://www.kcl.ac.uk/governancezone/students/student-protection-plan>

Annex 4: Condition D: Financial viability and sustainability and

Condition E update: Good governance

Condition D: Financial viability and sustainability

- 4.1 While there are no changes to report on the university's financial viability and sustainability, Council has received during the course of this academic year the OfS Five Year Forecast at its November 2023 meeting, and an updated Five-Year Forecast was included in the Integrated Planning document that Council approved at its meeting in July 2024.

Condition E: Good governance

- 4.2 Throughout 2023/24 there have been no updates to provide in relation to E1 and E3.
- 4.3 In relation to E2, the university completed an external governance effectiveness review of Council with AdvanceHE. The report from this review can be found [here](#). The reviewers found the overall governance at King's to be effective, but there is an opportunity to continue its trajectory of improvement. A number of recommendations from the review are now being worked on, with the aim to further improve the governance at King's. These recommendations will ensure that King's keeps pace with the changes being made elsewhere in the higher education landscape, while also moving to a more agile approach to governance.
- 4.4 In relation to E4, the University revised its Student Protection Plan during the course of 2023/24, with Academic Board granting its approval at its meeting on 26th June 2024 [[AB-24-06-26-05.4](#)] (and subsequently Council). In addition, the university wrote a separate Student Protection Plan for the Joint Education Institute (JEI) established as part of the partnership King's has with SUSTech. Academic Board approved this plan at its meeting on 26th June 2024 [[AB-24-06-26-05.5](#)] (and subsequently Council). Both Student Protection Plans were then submitted to the Office of Students on 29th July 2024.
- 4.5 In relation to E5, a review was undertaken during 2023/24 of the University's compliance with this condition of registration. While it was found that the university meets the basic requirements more could be done to bring together workstreams and to evidence actions taken. Recommended actions have been put forward for the University to action, with Students and Education Directorate identified as the lead contact for Electoral Registration Officers.
- 4.6 July 2024 also saw a general election held. Students were informed how to register to vote and to obtain free voter ID, with notices placed in digital posters, student newsletters, [student news](#) on the web, and an article placed on [Student Services Online](#). All actions taken have been documented to meet the E5 requirement to provide evidence of compliance with the Ongoing Condition of Registration.

Annex 5: Condition F update: Information for students

Condition F1: Transparency information

5.1 As of 18th September 2024, the deadline for publishing our transparency information has not been advised. This may be due to the delay by OfS in releasing data to the sector. Last year's transparency information related to the number of students who attained a particular degree or other academic award, or a particular level of such an award, on completion of their course with us and was published on the 13th October 2023 and can be found here: <https://www.kcl.ac.uk/aboutkings/quality/transparency-return>

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

5.2 Throughout the year there are numerous occasions where the University is required to submit information to the OfS (e.g annual financial information, Graduate Outcomes Survey contact details for students etc). Assurance can be given that we meet these timescales:

- Annual registration fee to the OfS was paid 31st July 2024 (deadline was 1st August 2024)
- The OfS Annual Financial Return (which includes the annual financial accounts) were all made before the deadline, as per the following file issued by the OfS:

King's College London (UKPRN: 10003645)

Log of all activities for the Annual Financial Return 2023 (AFR23)

Date and time of activity	Outcome
Friday 19 January 2024 09:44	The sign off form has successfully been submitted. The processed file 'AFR23_SignOff_10003645_1_19JAN2024_0944.xlsx' is now available in the latest successfully submitted files download package.
Thursday 18 January 2024 14:10	The OfS currently has no further queries regarding your return.
Wednesday 17 January 2024 11:37	The workbook has successfully been submitted. The processed file 'AFR23_Workbook_10003645_4_17JAN2024_1137.xlsx' is now available in the latest successfully submitted files download package.
Monday 15 January 2024 15:54	The workbook has successfully been submitted. The processed file 'AFR23_Workbook_10003645_3_15JAN2024_1554.xlsx' is now available in the latest successfully submitted files download package.
Friday 15 December 2023 09:13	The OfS currently has no further queries regarding your return.
Wednesday 13 December 2023 09:26	The return verification query responses have successfully been submitted. The OfS will review these as soon as possible. The submitted responses 'RESPONSES_AFR23_Queries_10003645_13DEC2023_0926.xlsx' are now available in the return verification queries download package.
Wednesday 13 December 2023 09:16	The workbook has successfully been submitted. The processed file 'AFR23_Workbook_10003645_2_13DEC2023_0916.xlsx' is now available in the latest successfully submitted files download package.

Date and time of activity	Outcome
Friday 8 December 2023 17:02	The financial statements have successfully been submitted. The processed file 'AFR23_FinancialStatements_10003645_1_08DEC2023_1702.pdf' is now available in the latest successfully submitted files download package.
Friday 8 December 2023 17:00	The external auditor's management letter has successfully been submitted. The processed file 'AFR23_ExternalAuditorsLetter_10003645_1_08DEC2023_1700.pdf' is now available in the latest successfully submitted files download package.
Tuesday 5 December 2023 09:55	The return verification query responses have successfully been submitted. The OfS will review these as soon as possible. The submitted responses 'RESPONSES_AFR23_Queries_10003645_05DEC2023_0955.xlsx' are now available in the return verification queries download package.
Wednesday 29 November 2023 11:43	The commentary has successfully been submitted. The processed file 'AFR23_Commentary_10003645_1_29NOV2023_1143.docx' is now available in the latest successfully submitted files download package.
Wednesday 29 November 2023 11:38	The workbook has successfully been submitted. The processed file 'AFR23_Workbook_10003645_1_29NOV2023_1138.xlsx' is now available in the latest successfully submitted files download package.

Annex 6: Condition G update: Accountability for fees and funding

- 6.1 Assurance can be given that King's does not charge its students above the fee limit determined by the University'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

- 6.2 The annual registration fees for OfS was paid 31st July 2024 (the deadline was 1st August 2024). The annual registration fee for HESA (Designated Data Body) was received 29th April 2024 and a PO raised 9th May 2024. Following submission of an invoice by HESA in August, the fee was paid 18th September 2024.
- 6.3 Following QAA stepping down from the Designated Quality Body (DQB) role, and the OfS taking this on in the interim, their annual fee included this DQB fee too.

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

Annual Report for the Concordat to Support the Career Development of Researchers

Universities and Research Institutes

Name of Institution	King's College London
Reporting period	June 2023-May 2024
Date approved by governing body	
Date published online	
Web address of annual report	https://www.kcl.ac.uk/research/research-environment/professional-development/centre-for-research-staff-development
Web address of institutional Researcher Development Concordat webpage	https://www.kcl.ac.uk/research/research-environment/professional-development/centre-for-research-staff-development
Contact for questions/concerns on researcher career development	Kathy Barrett, Associate Director (Research Staff Development) kathy.barrett@kcl.ac.uk
Date statement sent to Researcher Development Concordat secretariat via CDRsecretariat@universitiesuk.ac.uk	

Statement on how the organisation creates, maintains and embeds a research culture that upholds a positive and inclusive environment for researchers at all stages of their careers (max 500 words)

In our most recent strategy, Strategy 2026, we have outlined in the Thriving Staff Community section how “Our people are at the heart of King’s strategic ambitions”. This entails us actively cultivating an inclusive and welcoming community that respects individual differences and values collaboration. As part of this strategy, King’s has set up a high level Staff and Culture Strategy Committee whose members include research staff and students and that contributes to governance by monitoring progress on achieving agreed objectives.

We now have an established central department and multiple faculty-based posts addressing research culture. A key project that will start this year is to enhance equality and inclusion and increase the numbers of minorities in more senior roles at King’s. Each faculty also has its own local plan addressing research culture, one example of which is to support the experience and career development of research staff. We also work within the sector more widely, contributing to research culture communities and policy and practice, for example the current People, Culture and Environment aspect of the REF.

We regularly review our policies and procedures in line with current good practice, delivered with input from the unions and relevant staff. Current examples include how we manage requests for transfer to an open contract after 4 years of continuous employment. Our investment into “Report + Support”, a mechanism for managing all aspects of bullying, harassment and victimisation, is enabling us to improve our responses to this important issue. Using “Our Principles in Action”, a set of behavioural competencies that support positive interactions between our staff and students, also demonstrates our aspirations with regard to the culture we espouse.

In 2016 we established the Centre for Research Staff Development (CRSD) to provide professional development and to engage in policy and best practice for research staff. This centre is now well established and is seen as an important hub for research staff issues and information. In tandem with the CRSD we also have a team of careers consultants dedicated to support research staff in their career planning and development.

King’s is a signatory to a number of initiatives that support a positive research culture, including The Concordats to Support the Career Development of Researchers and Research Integrity, The Technician Commitment and the San

Francisco Declaration on Research Assessment. We hold Athena SWAN Silver Awards at Institutional and Faculty level, a Bronze Race Equality Charter Mark and the HR Excellence in Research Award.

We routinely carry out surveys of research staff, the last one being in 2023 alongside an All Staff Survey that demonstrated we are focusing on required initiatives. These surveys also enable us to monitor long-term trends in our efforts to uphold the principles espoused by the Researcher Development Concordat.

In the last four years we have increased our resources to support wellbeing, including courses for staff and their managers and online information for all. There are also significant workload evaluation and management projects being carried out to minimise poor practice in this area.

Provide a short summary of the institution's strategic objectives and implementation plans for delivering each of the three pillars of the Concordat (environment and culture, employment, and professional development of researchers) for your key stakeholder groups together with your measures for evaluating progress and success (*max 600 words*)

Strategic Objectives and monitoring

King's College London is now in its 12th year of receipt of the HR Excellence in Research Award, demonstrating our commitment to upholding the principles described in the Concordat to Support the Career Development of Researchers. We have described a variety of actions, with more detail available in the [action plan for this award](#). Critically, much of the work that we do is now considered business-as-usual as our implementation of a large number of the principles is longstanding. We are now focussing on projects that will bring new and substantial change.

King's has made a commitment in [Strategy 2026](#) to "Enhance our research culture, focusing on research careers in academia and beyond, supporting ethical, open research and research-enhanced education."

Opinions and viewpoints held by our research staff are gathered biennially through a college-wide survey of Research Staff (last run in 2023) and via the Research Staff Representative Committee (RSRC). In 2023 we also had an All Staff Survey. Faculties also carry out local evaluations. These enable monitoring of trends in how staff experience their time at King's and the success of the action plan.

Environment and culture

Our Positive Workplace Initiatives is a central programme to address leadership, Training & Awareness Raising, Reporting, Monitoring & Support and Reward, Retention & Recognition. Embedded within this is "Active Bystander Training", designed to enable staff to understand what is meant by Bullying and Harassment (B&H) and how to address it.

We have also invested in a new central system, “Report + Support”, to guide those seeking information and wishing to record incidents. This has been running since October 2022 and has proved popular. Locally, faculties are appointing “Confidential Advisors” as first responders to incidents and to address governance and monitoring.

Faculty-led and central training programmes addressing environment and culture included in the action plan cover Mental Health First Aid Training and specifically “Diversity THRIVE” for those from racial or other minority backgrounds being piloted in one faculty. This will be rolled out across the university as part of the INKLUDE Project run by the central Research Culture team.

Employment

Our priority employment project has been to review the use of fixed-term contracts (FTCs). Progress in this project has been evaluated by completion of key stages, e.g. research goals, internal processes reviewed.

There is new central training for Managers of research staff incorporating the “Managers Toolkit” and local training for line managers offered within specific faculties, along with data gathering on attendance and uptake.

The process for promotion of research staff remains opaque and inaccessible to research staff. Our future approach will focus on providing insight into what options are available.

Professional Development of Researchers

Professional development opportunities for managers around their obligations to researchers is generally increasing across the university. Specifically included in this action plan is a new course developed by the CRSD in collaboration with managers that also touches on the use of the Managers Toolkit, with increasing attendances from the first to second year.

Our dedicated Researcher Careers Team have established new courses and resources in this action plan addressing careers both within and outside of the academic environment.

To encourage research staff to gain new skills one faculty has created an award scheme recognising contributions to wider agendas, e.g. committees and project leadership, now copied by other faculties. We have also set up an award to recognise contributions to postgraduate research project supervision by research staff. These projects are monitored and evaluated by participation. In addition, we have reestablished funding to cover the cost of professional registration through the Science Council to encourage engagement with professional development among our technical community.

Summary of actions taken, and evaluation of progress made, in the current reporting period to implement your plan to support the three pillars in respect of each of your key stakeholder groups [Institution; Academic Managers of Researchers (Deans, Heads of Schools/Departments/PIs); Researchers]	
Environment and Culture (<i>max 600 words</i>)	<p>Institution</p> <p>Positive Workplace Initiatives</p> <p>Establishment of a central “Strategic Programme Manager – Preventing and Addressing B&H” post to take forward actions and interventions to support staff and students enabled improved management of cases</p> <p>Report and Support launched in October 2022. This is now fully integrated into King’s systems and the number of reports is increasing, with many where individuals are named now resulting in investigations and resolutions. Unnamed reporting is also providing information about repeated patterns by individuals and within specific locations, which will enable increased opportunities to address issues.</p> <p>Active Bystander training continues to be popular and now includes guidance and scripts for managers dealing with B&H. A B&H toolkit is under development, to be launched in September 2024.</p> <p>One faculty has been carrying out qualitative research with their staff on their perception of research culture in their faculty and have incorporated findings into an action plan based on the results.</p> <p>One faculty is also working towards raising awareness of what B&H is and how King’s deals with it. The role of their Research Integrity Advisors is being made more visible and all the Advisors are fully aware of resources such as “Report + Support”. The appointment of a new Research Integrity Facilitator will enable evaluation of how effective these roles are.</p> <p>Academic Managers of Researchers</p> <p>One faculty has initiated a “Catalyst Project” that saw an event held in early 2024 at which inclusivity of job roles was encouraged, rated 4.19/5, additional research staff events, and an improved induction process. Initial stages of the project are now concluded with new roles created for the next phase.</p>

	<p>Within one faculty Confidential Advisors were appointed in May 2023. Over the last year they have been shown to have a positive impact on B&H. Their appointment is following on from the success of similar posts in a separate faculty.</p> <p>One faculty is working on an EDI action plan with a specific strategic group to address workload, flexible working and long working hours. Initially delayed this work has now recommenced following appointment of a new Associate Dean, resulting in enhanced training availability.</p> <p>One faculty has set up an EDI hub that includes details of all training and awareness courses available online, now also linked to dedicated people and culture pages, impact to be addressed in the next year.</p> <p>One faculty hosted a mindfulness, wellbeing and time management event with inclusivity at its heart. This included speed talks by colleagues at all levels and backgrounds to encourage inclusivity. The event exceeded attendance expectations.</p> <p>Researchers</p> <p>Two faculties have created dedicated Sharepoint hubs to be a central portal for all relevant information their Research Staff need. One includes links to induction materials with views steadily increasing, currently 500, the other is used regularly for signposting. One other faculty now holds regular annual events to raise awareness of available resources, the most recent one having received 25/26 rating for attending again.</p> <p>Mental Health First Aid Training has been so successful that courses are now provided centrally, improving access to all across the university.</p> <p>Diversity THRIVE, a training programme for researchers from racial or other minority backgrounds, has been successfully developed in one faculty. The programme is now being rolled out across the university as part of a Wellcome funded project to improve recruitment and retention of minorities.</p>
Employment (max 600 words)	Institution

We have carried out an extensive review of the use of FTCs at our own and other universities. When open contracts have been offered with a limited by funding clause research staff have viewed them as disingenuous. Consequently we have moved to a new approach of ensuring that our processes around the use of FTCs are transparent, equitable and applied fairly. The first stages of this project are almost complete with extensive revisions being made to existing processes. Following implementation of phase 1 that addresses changes to requirements at 4 years of employment we will move to a second phase exploring improvement in contract length.

HR are also addressing the use of FTCs by raising awareness among managers of the appropriate process for contract termination. A new tool created for redeployment has been rolled out in autumn 2023.

Inductions are variable across the university and many staff tell us that they are not aware of what is available to them. The CRSD and RSRC have been working together to generate new resources, which will be available towards the end of 2024. One faculty has been piloting a researcher-supervisor agreement signed during induction. Awareness of this document is now rising with 7/11 of the latest recruits having signed it and other faculties considering adopting it

Other faculties have been updating or enhancing their induction programme, creating induction packs and buddy schemes and focusing on specific topics relating to research staff.

Mentoring and buddying continues to be on the agenda but uptake is lower than anticipated. This may have an impact on the willingness of faculties to devote time to running such programmes, although they remain a popular concept.

One faculty has created an App for use in monitoring uptake of PDRs now into the 3rd year of use. This has provided accurate data, e.g. % take up, enabling the faculty to target areas where improvements are required. Use of the app will be reviewed annually.

Academic Managers of Researchers

	<p>Uptake of the <u>Managers Toolkit</u> is still low and evaluation has yet to be carried out, although there appears to be greater awareness of its existence.</p> <p>Researchers</p> <p>Promotion processes for academic and research staff vary. One faculty has merged local processes to create a consistent faculty policy. Research staff continue to request clarity and opportunities in this area, making it something that King's should address.</p> <p>In early 2023 we initiated the Mentoring and Support Awards for those who have given support to PGR students beyond their official role. The first round resulted in 4 nominations and 2 winners from the research staff community and the award will be continued annually.</p> <p>Research staff and those who manage them continue to have mixed levels of awareness of their right to 10 days per year to devote to professional development. Between surveys in 2021 and 2023 there was an increase from 6 to 8 out of 10 considering that they spend at least 1 day a month on professional development. Although King's is going in the right direction we intend to initiate a new campaign to highlight this right.</p> <p>For one faculty, appointing a Learning & Development Champion was expected to address this issue. After an initial delay the Champion has been appointed and we expect progress to be made.</p> <p>One faculty has set up funding for professional development beyond the internal programme. This has proved popular and are now widely applied for, with research staff being more aware of CPD options.</p>
Professional development (max 600 words)	<p>Institution</p> <p>Institutional funding for professional registration with the Science Council (RSci, RSciTech, CSci) has now been reinstated indefinitely. Initial registrations are slow, but this is in part because our technical colleagues are also awaiting changes in the application process for this important accreditation. We anticipate there will be many more applications in the coming year.</p>

One faculty has posted clear statements regarding their support of a range of careers on their webpages and at the top of their dedicated SharePoint hub. It has also been circulated via emails. In hindsight, it is difficult to evaluate this measure, other than to note that the statements have been posted, but the faculty reports that it helps to facilitate conversations around research staff career development. Data from our biannual surveys also hint at greater confidence that there is support for a wider range of career options.

Academic Managers of Researchers

The CRSD's Challenge & Support Course, designed in collaboration with managers to support them specifically in managing research staff, ran 3 times in 2022-3 and 2023-4. Booking numbers increased with each iteration resulting in more than 60 attendances in year 1 and 80 in year 2. Course participants continue to report a learning gain immediately after the course and 3 months after the course in the first year 100% of respondents reported a direct change to their working practice due to attending the course. We plan to continue running this course in the forthcoming academic year.

Since the original action plan was written, UKRI and other funders have requested that grant applicants include how they will support their staff during their projects. The CRSD have piloted extending the above training to cover this topic, starting with a one faculty and a large meeting. In both instances the reception was sufficiently favourable that we will seek out other opportunities to roll out such training more widely.

Researchers

One faculty piloted an award scheme to recognise contributions of research staff to a wider agenda, e.g. committee contributions and project leadership. The intention is that research staff will be encouraged to broaden their skills and experience by this award. Overall the scheme was considered so successful that other faculties are following the example. We have yet to evaluate if it has had the desired effect on research staff.

	<p>Following on from the success of our suite of 20 case studies of King's Postdocs who have moved on to careers outside of the academic environment we are extending this project to examine hidden careers within HEIs. This project is supported by funds for Research Culture from Research England. Initial steps include obtaining ethical approval with future publication in mind and scoping of potential candidates.</p> <p>King's Careers & Employability's courses addressing academic progression that are targeted to specific groups, e.g. Advancing in Academia for Natural & Mathematical Sciences, What's up Doc for research assistants considering a PhD and a generic online version of Advancing in Academia have all been delivered and received good feedback. They are now in a process of review and updating to ensure they remain relevant and accessible.</p> <p>Mental Health First Aid training has proved sufficiently popular that King's has now established and filled posts to deliver this in house. The first sessions will be rolled out over the next reporting period. The effect of trauma encountered during some research projects is now more widely recognised, prompting pilot projects on support for affected researchers in the forthcoming year.</p> <p>We have reestablished our apprenticeship scheme for technicians. This is expected to provide a large cohort of our established technical colleagues with the opportunity to gain management and organisational skills.</p>
<p>Comment on any lessons learned from the activities undertaken over this period and any modifications you propose to make to your action plan and measures of success as a result. (max 500 words)</p>	
<p>We continue to see growing enthusiasm from senior management and the faculties to engage with the principles of the Researcher Development Concordat as the Research Culture agenda takes root. This is enabling us to drive through relevant initiatives as they are included in an increasing number of strategic plans.</p> <p>Most of our projects were new at the beginning of this action plan and many on a larger scale than previous projects. We are confident that the majority of them are making good progress and we anticipate seeing more impact in the next reporting period. Early signs of success are that we are seeing a number of projects being copied from one faculty to the next. We ran our biennial survey last year and identified an increase in the amount of professional development undertaken since the previous survey.</p>	

We continue to be enthusiastic about having ceased reporting on what has become business-as-usual and focusing on ambitious projects that we anticipate will result in substantial benefits. We have already noticed this with our courses for the managers of research staff and our approach to B&H.

We anticipate that our project to address the use of FTCs will similarly yield positive results. We have reviewed our processes and found ways in which we can improve those addressing requests for transitions to open contracts following 4 years of continuous employment. While the legal requirement is for those who have had 2 or more FTCs we have agreed to extend this to those on 1 FTC. In carrying out the project we have also uncovered approaches to maintain the connection between contract and cost allocation, thereby making open contracts more feasible for all our research staff. We anticipate making changes to the existing processes later in 2024. Once this is delivered we intend to focus our attention on the length of contracts for research staff supported by external funding.

The implementation of “Report + Support” in its early days appears to be having an impact on the perception of how King’s responds to B&H. While we anticipate that reporting may increase we would like to think that this is because our colleagues are more willing to come forward. Early indications from the King’s Research Staff Survey are that there is an increase in reporting and knowing how to report. We continue to watch the outcomes from this initiative with enthusiasm, including data on the number of cases dealt with, the time it takes to deal with them and the kinds of resolutions reached.

Supporting managers in their ability to serve their research staff is an area that we continue to see needs more attention, as does improving knowledge about the entitlement to professional development time. We will continue to broaden our offering for the managers and understanding of professional development over the final year of the action plan, tapping into the requirement for professional development to be written into grant applications. The CRSD will measure this by the numbers of staff we discuss these issues with and the success of grant applications containing this information.

**Outline your key objectives in delivering your plan in the coming reporting period
(max 500 words)**

Key objectives around our three priority projects are outlined here. There are other projects not listed here that can be found in our HR Excellence in Research Action Plan, some of which are described above.

Fixed-term contracts

1. Clear policy regarding how we manage transfer to open contracts following 4 years continuous service
2. Increase in transfers from fixed-term to open contracts following 4 years continuous service or reasons why applications are not made or granted
3. Functioning redeployment process that provides continued employment for those whose contracts come to an end. We anticipate that not all staff will want to take advantage of this so will be monitoring those who decline the opportunity as well as those who take it up. Evaluation may include input from those who have been redeployed and their new manager regarding the success of the process and fit of the new role.
4. Initiation of a project to review contract length vs grant length. The initial findings suggest that there are multiple reasons for any discrepancy, some of which are fully valid. We will aim to identify those that can be changed without disruption, e.g. length of time between the grant being awarded and staff being recruited, and make those the focus.
5. Clear communications to help those affected understand how the project is unfolding and what our aims are, monitored by responses to these communications and appreciation of what our aims are.

Bullying and Harassment

1. Continue to monitor the use of “Report + Support”, creating clear data to demonstrate the value of the information within it and the success of resolution of conflict prior to official registration of cases and outcomes of cases that are officially registered.
2. Roll out work on anonymous reporting where trends and multiple reports pinpointing individuals and locations enable action to be taken.
3. Continue “Active Bystander” training, monitoring uptake and feedback from participants to ensure it continues to be of value together with additional advanced courses and similar evaluation.

Training and Resources for Managers

1. Continuation of existing courses and creation of new ones to support good practice in the management of research staff and creation of new courses and resources for those needing to include professional development of their staff into grant applications. Monitoring will be by long term feedback from course participants and research staff employed on such grants, together with success rates of grant applications.

Projects not described in the existing plan

1. Following on from the success of our Career Tracks project we are now focusing on the identification of the career paths taken by those who start as researchers and remain in Higher Education in roles other than becoming an academic. The outcome will be a resource for research staff and their managers to understand the options for those who wish to take alternative paths and the strategies used to do this.
2. There is still a lack of awareness about the entitlement for research staff to 10 days per year to undertake professional development. We are starting a new campaign that addresses this.

Please provide a brief statement describing your institution's approval process of this report prior to sign off by the governing body (*max 200 words*)

The report is compiled by the CRSD. Content is provided by faculties and central departments via individual communications, consultation with the CRSD's Oversight Group and the RSRC. It is then submitted to College Research Committee, the body responsible for research and the research environment at King's. This committee is responsible for delivering on the actions outlined in the plan and includes faculty Vice Deans for Research, the Dean for Research Culture and the Vice President (Research & Innovation).

Following approval at this level the report passes to Academic Board for scrutiny. The Academic Board is the body responsible on behalf of the Council for the academic work of the university in teaching and examining and in research. The Board is established under the Charter and Statutes and its responsibilities are defined in the Ordinances.

The report passes from there for final approval by the university's governing board, College Council.

Current timeframes are for College Council to receive the report for discussion at their November meeting, with the reporting period coinciding with that of the HR Excellence in Research Award submission, typically ending in May. Publication of the action plan aligns with the HR Excellence in Research Award renewal, typically November.

Signature on behalf of governing body:

Contact for queries: Kathy Barrett, Associate Director (Research Staff Development)
kathy.barrett@kcl.ac.uk

This annual report will be analysed by Universities UK, secretariat for the Concordat to Support the Career Development of Researchers, to identify good practices, themes for development and information to improve national research culture policy and practice.

If you have any questions, or suggestions on how the reporting process could be improved, please contact the secretariat at CDRsecretariat@universitiesuk.ac.uk
www.researcherdevelopmentconcordat.ac.uk

Report of the Audit, Risk and Compliance Committee

Contents	Meeting at which considered	Consent agenda	Council action
1. Financial Statements* & External audit report and letter of Representation [Annex 1 & 2] [*See item 9.1 Finance Committee for the Financial Statements]	5 November 2024	No	Approve
2. Annual Statement regarding the Prevent duty [Annex 3]	5 November 2024	Yes	Approve
3. Annual College Safeguarding Report [Annex 4]	5 November 2024	Yes	Approve
4. Annual Research Integrity Statement [Annex 5]	5 November 2024	Yes	Approve
5. Annual Report of the Audit, Risk and Compliance Committee [Annex 6]	5 November 2024	Yes	Note
6. Internal Assurance Update	5 November 2024	Yes	Note
7. Risk presentations and discussions: The Board Assurance Framework (BAF) – Progress to date and next steps	5 November 2024	Yes	Note

For approval

1. Financial Statements and External audit report and letter of Representation

Motion: That the External Auditor's Report to Council for the year ending 31 July 2024, be approved, provided that Outstanding Matters and Appendix 3 – Audit Differences, be updated.

Members of the ARCC considered the draft External Auditors' Report. The External Auditor letter set out that their review of a Natwest loan swap arrangement remains ongoing, and that adjustments required had been shared with management. At the ARCC meeting on 5 November ARCC management challenged this finding and recommended that ARCC not accept that adjustment. There were clear records of the loan, which was a single fixed rate transaction. It was clarified that there were two documents, but it was one loan. The External Auditors undertook to revisit and update that section of the External Auditor's Audit Management letter (Outstanding Matters and Appendix 3 – Audit Differences). It was expected this would be straight forward with an update possible by the time of the Finance Committee meeting on 11 November.

Much work had been undertaken to ensure that members of the ARCC, and the Finance Committee, had the opportunity to understand the accounts fully. This included a "teach-in" session led by Finance staff. At the time of the ARCC meeting, the audit was substantially concluded, and the auditors were not expecting any issues to arise which would prevent them issuing a clean audit opinion at the end of November 2024.

The Audit Report is attached in **Annex 1**, and the Letter of Management Representation to be sent to KPMG is attached in **Annex 2**. Financial Statements are appended to the Finance Committee report to Council.

2. Annual statement regarding the Prevent Duty

Motion: That the Annual Prevent Report for the period ending 31 July 2024, be approved.

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 Office for Students (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. The Annual Prevent Statement is attached at **Annex 3**

3. Annual College Safeguarding Report

Motion: That the Annual College Safeguarding Report for the year ended 31 July 2024, be approved.

The ARCC considered the report of the College Safeguarding Steering Group for the 2023/24 academic year. This report detailed the safeguarding activity across the University for the academic year 2023-24, in relation to Policy and Procedure Updates, under 18s, Bullying and Harassment, Support for Study, Student of Concern Procedure, Training, Widening Participation, Staff/HR, Visitors and Safety, and International. A copy of the Annual College Safeguarding Report is attached at **Annex 4**.

4. Annual Research Integrity Statement

Motion: That the Council approve the Annual Research Integrity Statement for the year ended 31 July 2024.

Members of the ARCC considered the Annual Research Integrity Report and Statement which had been prepared by the Director of Research Governance, Ethics and Integrity. As a signatory to the Universities UK Concordat to Support Research Integrity, the College is required to publish an annual statement which sets out its approach to upholding research integrity, a retrospective report of activity which has been undertaken in the year to promote research integrity and an analysis of the number of cases over the past five years where breaches of research integrity have been reported and formally investigated, along with the outcomes. This statement has been previously approved and referred to ARCC by College Research Committee. The ARCC has considered this statement and recommends it to the College Council for final approval. A copy of the Annual Research Integrity Statement is attached at **Annex 5**.

For note

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

The Audit, Risk and Compliance Committee has prepared a report, reviewing its work in the 2023-24 year. The report includes a commentary on the Committee's management and engagement with the College. In addition to the work reported in this paper, work has continued to prepare for the implementation of a Board Assurance Framework (BAF). The introduction of the BAF was one of the key recommendations made by the Advance HE Governance Review, which was accepted by Council in March 2024, and the ARCC support the view that the whole governance of assurance at King's College London would be improved by the introduction of a BAF. The annual report provides a detailed report on each of the risk topic discussions which have taken place at the meetings of the ARCC. The report also comments on its consideration of compliance matters.

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. The full report is attached at **Annex 6**.

6. Internal Assurance update

The Committee approved the Audit Plan for 2024-2025 and received an update from the Director of Risk Assurance. Four compliance audits had been carried out since the previous ARCC meeting in June. All were amber, with the closest to a red being the Web Accessibility audit but it was mitigated by new recruitment to a Director of Digital Education post. There were four completed audits from the main audit plan, two amber, two green. Follow-up to audit recommendations had improved from 44 outstanding action points in June to 36 outstanding actions in November. The Audit Team are following up with the Vice President (Finance) later in the month. The Internal Assurance Service Annual report included a summary of internal audit reviews carried out in 2023-2024. Overall, internal controls were deemed sound, with management actively engaged in improvements. The new Board Assurance Framework (BAF) is expected to enhance risk monitoring and governance across the university. An update on the Cyber Security Update would be considered by the next meeting of the ARCC.

The Compliance Assurance update report summarised the compliance assurance audits that have been completed since the June 2024 ARCC meeting and highlighted key risk areas, together with a summary of the risk-based approach to identifying issues that require compliance checks. Compliance assurance audits completed since the June 2024 meeting were: web and app accessibility regulations; governance for Subsidiary Trading Companies; OfS Conditions of Registration: E5 Electoral Representation; Education Act 1996: KCLSU Code of Practice.

7. Annual Report on Procurement Activity

The ARCC received a report from the Chief Procurement Officer on the scale of procurement activity and the financial influencing of contract negotiations.

8. Risk discussion: The Board Assurance Framework (BAF)

The ARCC noted progress to date on the development of a Board Assurance Framework and its implementation plan, and noted that the proposal had been tested at the October meeting of the Academic Board. That meeting discussed the principle of subsidiarity and how subcommittees might be able to help in providing more assurance. There were five areas on the BAF list for Academic Board responsibility. Two were around compliance and related to College Education Committee and College Research Committee work. ARCC noted the Academic Board discussion about whether the remaining three areas could become two, focusing on strategic ambition of education and research respectively.

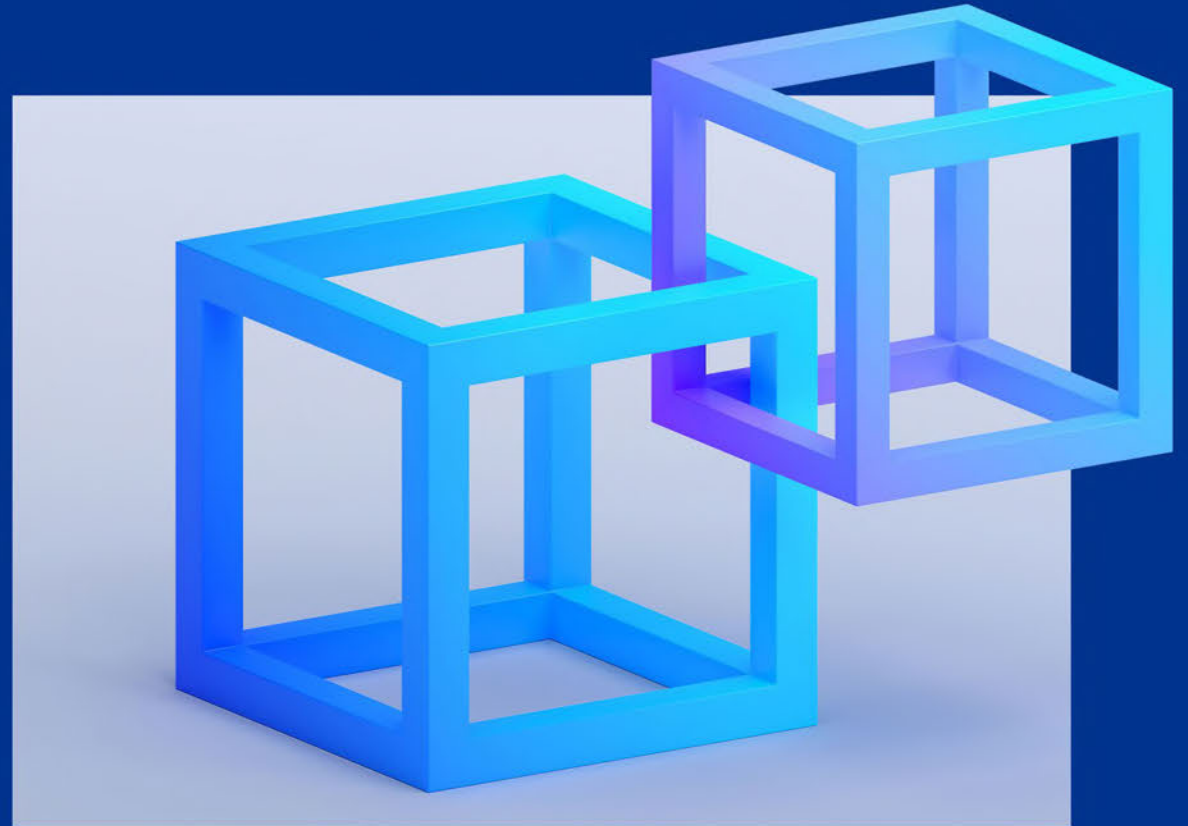


King's College London

Report to the Audit, Risk and Compliance
Committee

**Consolidated financial statements for the year ended 31
July 2024**

—
5 November 2024



Key contacts

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Introduction

To the Audit, Risk and Compliance Committee of King's College London

We are pleased to have the opportunity to meet with you on 5 November 2024 to discuss the results of our audit of the consolidated financial statements of King's College London (the 'University') and its subsidiaries (the 'Group'), as at and for the year ended 31 July 2024.

We are providing this report in advance of our meeting to enable you to consider our findings and hence enhance the quality of our discussions. This report should be read in conjunction with our audit plan and strategy report, presented on 15 May 2024. We will be pleased to elaborate on the matters covered in this report when we meet.

Subject to the Council's approval, we expect to be in a position to sign our audit opinion on the Council's approval of the financial statements and auditor's representation letter, provided that the outstanding matters noted on page 6 of this report are satisfactorily resolved.

There have been no significant changes to our audit plan and strategy.

We expect to issue an unmodified Auditor's Report.

We draw your attention to the important notice on page 4 of this report, which explains:

- The purpose of this report
- Limitations on work performed
- Restrictions on distribution of this report

Yours sincerely,



Rees Batley

5 November 2024

How we deliver audit quality

Audit quality is at the core of everything we do at KPMG and we believe that it is not just about reaching the right opinion, but how we reach that opinion.

We consider risks to the quality of our audit in our engagement risk assessment and planning discussions.

We define 'audit quality' as being the outcome when audits are:

- Executed consistently, in line with the requirements and intent of applicable professional standards within a strong system of quality management and
- All of our related activities are undertaken in an environment of the utmost level of objectivity, independence, ethics and integrity.

Important notice

This report is presented under the terms of our audit engagement letter.

Circulation of this report is restricted.

The content of this report is based solely on the procedures necessary for our audit.

Purpose of this report

This Report has been prepared in connection with our audit of the consolidated financial statements of King's College London (the 'University') and its subsidiaries (the 'Group'), prepared in accordance with FRS 102 the Financial Reporting Standard applicable in the UK and the Republic of Ireland, as at and for the year ended 31 July 2024.

This Report has been prepared for the University's Audit, Risk and Compliance Committee, a sub-group of those charged with governance, in order to communicate matters that are significant to the responsibility of those charged with oversight of the financial reporting process as required by ISAs (UK), and other matters coming to our attention during our audit work that we consider might be of interest, and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone (beyond that which we may have as auditors) for this Report, or for the opinions we have formed in respect of this Report.

This report summarises the key issues identified during our audit but does not repeat matters we have previously communicated to you by written communication on 15 May 2024.

Limitations on work performed

This Report is separate from our audit report and does not provide an additional opinion on the Group's financial statements, nor does it add to or extend or alter our duties and responsibilities as auditors reporting to the University's members in accordance with the Charters and Statutes of the University.

We have not designed or performed procedures outside those required of us as auditors for the purpose of identifying or communicating any of the matters covered by this Report.

The matters reported are based on the knowledge gained as a result of being your auditors. We have not verified the accuracy or completeness of any such information other than in connection with and to the extent required for the purposes of our audit.

Status of our audit

Our audit is not yet complete and matters communicated in this Report may change pending signature of our audit report. We will provide an oral update on the status. Page 6 'Our Audit Findings' outlines the outstanding matters in relation to the audit. Our conclusions will be discussed with you before our audit report is signed.

Restrictions on distribution

The report is provided on the basis that it is only for the information of the Audit, Risk and Compliance Committee of the Group; that it will not be quoted or referred to, in whole or in part, without our prior written consent; and that we accept no responsibility to any third party in relation to it.

Our audit findings

Significant audit risks	Risk change	Our findings (Page 7-10)
Revenue recognition – fraud and error risk related to research income	No change	Our work in this areas is nearing completion. We have not identified any audit adjustments in respect of research income. There is one control recommendation that remains open from the prior year.
Management override of controls	No change	Our work remains ongoing at present. We have not identified issues in the testing to date, but note one control recommendation to bring to your attention on page 23.
Other audit risks	Risk change	Our findings (Page 11-14)
Going Concern	No change	Our work in this area is ongoing. We have performed an initial review of management's assessment of the University's ability to continue as a Going Concern and have not identified any issues to date.
Valuation of land	No change	Whilst our work in this area remains ongoing, we have not identified any issues with the valuation of land to date.
Key accounting estimates		Our findings (Page 15)
Valuation of land	Neutral	Whilst our work in this area remains ongoing, from our initial testing, we consider the assumptions to be reasonable and underlying estimate to be neutral.

Audit Misstatements	(Page 27)
We identified one adjusted audit difference in relation to the recognition of a financial instrument, with corresponding updates made to the relevant disclosures.	
We have not identified any uncorrected audit misstatements.	
Misstatements in respect of Disclosures	Our findings (Page 27)
We note one disclosure adjustment due to one individual in the key management personnel disclosure that had been disclosed at an incorrect band. This has since been corrected in the latest version of the financial statements.	

Number of Control deficiencies	Page 21-26
Significant control deficiencies	0
Other control deficiencies	3
Prior year control deficiencies remaining outstanding	3
Prior year control deficiencies remediated	4

Our audit findings – Outstanding Matters

Whilst we have completed the majority of our audit testing, there remains areas of audit testing ongoing and hence our conclusions are subject to the completion of the matters outlined below. We will provide a verbal update on these items during the Audit, Risk and Compliance Committee. The list below is not exhaustive and further queries may arise through the review of our audit work papers, which is ongoing..

Audit Area	Outstanding Item/ Audit Progress Update	Conclusions Based on Testing Completed to Date
Journals	We are in the process of reviewing the documentation provided by management to support our high risk journals sample.	No issues have been identified to date in this area – see page 10 for further details
Research Income	Our work in this area is well progressed. We await responses on 2 sample items to conclude on this area of testing.	No issues have been identified to date in this area – see page 8 for further details
Going Concern	We have received management's going concern assessment and are currently in the process of finalising our documentation and review of the assessment.	No issues have been identified to date in this area
Other Income	Our work in this area is well progressed. We are in the process of reviewing the debtors and other deferred income balance in order to conclude.	No issues have been identified to date in this area
Operating Expenditure	Our work in this area is well progressed. We are in the process of finalising the output from our utilisation of AI in this balance along with documenting our sample selected for accruals testing.	No issues have been identified to date in this area
Fixed Assets	Our work in this area is well progressed. We have now received the land valuation from Gerald Eve and are in the process of reviewing this along with the associated accounting entries. We are also finalising our fixed asset existence testing with management.	No issues have been identified to date in this area and on initial review of the valuation report, the land value is within KPMG expected range based on alternative external data – see page 15 for further details
Treasury and Debt	Our review of the loan swap arrangement remains ongoing at present, we await the final version of the financial statements with the disclosures included to conclude on this area of work.	Adjustments required have been shared with management and hence we do not anticipate any issues with the revised financial statements.
Financial Statements	We await a final copy of the annual report and financial statements to review. This will include considering compliance of the annual report against the OfS requirements.	No issues have been identified to date in this area

Audit risks and our audit approach (cont.)

1

Revenue recognition: Fraud risk related to revenue recognition – Research Income

Research income does not exist, is not completely recorded in accordance with the SORP and is not accurately recorded under the performance model.



Significant audit risk

The University manages a significant number of projects from a range of public and private sources with a variety of contractual requirements in terms of treatment of direct and overhead costs and other evidence/compliance requirements.

Research grants and contracts income is accounted for under the Performance Model. Unless specifically disallowed, in most cases expenditure on the grant purpose is presumed to be the performance condition and therefore income is generally recognised in line with the related expenditure.

We consider there to be a significant risk of fraud and error in the recognition of research revenue largely due to inappropriate allocation of costs to the research projects.

There is a related risk of fraud and error that non compliance with grant terms and conditions results in income not being recognised in line with the University's accounting policies or relevant accounting standards.



Our response

We performed the following procedures:

- We considered the control framework in place to monitor the research projects ledger, including the approval to set up new projects, the ongoing monitoring of research projects and the expenditure allocated to individual projects throughout the year.
- We performed a reconciliation of both research expenditure to research income, as well as movements in research debtors and creditors (driven by income recognised in year). For a sample of income considered as part of movements in debtors and creditors, we agreed to actual cash receipts.
- For a sample of research projects we tested whether expenditure is in line with the terms and conditions of the relevant contract and overhead rates were set at the level specified in the grant agreement, to assess whether associated income was included in the correct period and accounted for in accordance with the requirements of the relevant accounting standards (and in turn identify any instances of non-compliance).
- We reviewed research activity by funder and specifically considered any grants with non-standard terms and conditions to assess whether the activities met the definition of research for finance reporting purposes and that projects are accounted for in accordance with the requirements of the FEHE SORP.
- We critically assessed research project data to identify projects with movements outside of our expectations in both accrued and deferred income balances. For projects identified outside of our expectations we confirmed that the accounting treatment is appropriate by reference to grant agreements and other supporting documentation.

Audit risks and our audit approach (cont.)

1

Revenue recognition: Fraud risk related to revenue recognition – Research Income

Research income does not exist, is not completely recorded in accordance with the SORP and is not accurately recorded under the performance model.



Significant audit risk

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We consider there to be a significant risk of fraud and error in the recognition of research revenue largely due to inappropriate allocation of costs to the research projects.

There is a related risk of fraud and error that non compliance with grant terms and conditions results in income not being recognised in line with the University's accounting policies or relevant accounting standards.



Our findings

- Our findings from reviewing the controls in place surrounding research project review have resulted in a control recommendation in relation to the review of aged WIP recorded within the Research Project Ledger. Our testing identified 275 research projects with accrued income balances that had not moved since the prior year, with a total value of c. £5.1m. Further detail of this can be found in appendix two.
- Our sample testing included review of both cash received and research expenditure items. Based on the testing complete, no issues have been identified in relation to both the expenditure recorded against the research project or the transactional posting of cash receipts against individual research projects during the year.
- We were able to reconcile research expenditure to research income to confirm that the income was accounted for in accordance with FRS102 and FEHE SORP and in line with the performance conditions of the grant (i.e. the expenditure incurred).

Outstanding Procedures

- Finalisation of research income sample testing, there are two items across our research expenditure testing which require further follow up with management.
- Finalisation of our review of movements of both accrued and deferred income on individual research projects during the year, based on commentary provided by management.

Audit risks and our audit approach (cont.)

2

Management override of controls^(a)

Fraud risk related to unpredictable way management override of controls may occur



Significant audit risk

- Professional standards require us to communicate the fraud risk from management override of controls as significant.
- Management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.
- We have not identified any specific additional risks of management override relating to this audit.



Our response

Our audit methodology incorporates the risk of management override as a default significant risk. We performed the following procedures:

- Assessed accounting estimates for biases by evaluating whether judgements and decisions in making accounting estimates, even if individually reasonable, indicate a possible bias.
- Evaluated the selection and application of accounting policies.
- In line with our methodology, evaluated the design and implementation of controls over journal entries and post closing adjustments.
- Assessed the appropriateness of changes compared to the prior year to the methods and underlying assumptions used to prepare accounting estimates.
- Assessed the business rationale and the appropriateness of the accounting for significant transactions that are outside the component's normal course of business, or are otherwise unusual.
- Made inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments.
- Screened all journal entries for high-risk attributes using KPMG Clara General Ledger Analysis

(a) This is a significant risk that professional standards require us to assess in all cases.

Audit risks and our audit approach (cont.)

2

Management override of controls^(a)

Fraud risk related to unpredictable way management override of controls may occur



Significant audit risk

- Professional standards require us to communicate the fraud risk from management override of controls as significant.
- Management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.
- We have not identified any specific additional risks of management override relating to this audit.



Our findings

Our work in this area remains ongoing at present.

- We have reviewed the relevant disclosures and accounting estimates made by management in the preparation of the financial statements and have not identified indicators of management bias.
- We utilised KPMG Clara General Ledger Analysis to review journals posted throughout the period. We identified 24 journal entries and other adjustments meeting our high-risk criteria, including journals posted to seldom used account codes and cash and research income journals posted with unusual account combinations – our examination did not identify unauthorised, unsupported or inappropriate entries.
- Our procedures did not identify any significant unusual transactions.
- We have raised one control recommendation in relation to the design and implementation of controls in place to address this significant risk, further information can be found on page 23.

Outstanding Procedures

- Receipt of final sample items from management to support journals selected for testing.
- Receipt of final version of the trial balance (inclusive of revaluation of land journals) to support post close journal entry testing.

(a) This is a significant risk that professional standards require us to assess in all cases.

Audit risks and our audit approach (cont.)

3

Going Concern

Risk relating to disclosures related to going concern including the judgement of whether there is material uncertainty



Other audit risk

- Management's assessment of the entity's ability to continue as a going concern involves significant judgment with respect to student recruitment in future years.
- There is currently significant financial challenges across the higher education sector, with a number of Universities noting financial pressure. The University are forecasting to report a operating deficit position of c£10m in the current year, due to pressures on recruitment, and are working to mitigate the risks through restraining discretionary spend.
- The University continues to maintain healthy cash reserves with a cash and cash equivalents balance of c£375m as at 31 July 2023, and strong operating cash flows and continues to monitor their working capital requirements based on their development and organisational needs.
- There is a risk that disclosures in the financial statements and the annual report are not adequate with regard to the effect of the risks on the entity's financial position, performance, business model and strategy.



Our response

- Evaluated how management's risk assessment process identifies business risks relating to events and conditions that may cast significant doubt on the ability to continue as a going concern.
- Evaluated the models management uses in its assessment, including use of the work of specialists, and evaluated how the information system captures events and conditions that may cast significant doubt on ability to continue as a going concern.
- Evaluated whether management's assessment has failed to identify events or conditions that may cast significant doubt on going concern and whether the method used by management is appropriate.
- Assessed the reasonableness of management's budgets/forecasts and evaluate whether they are within a reasonable range, and assess the plausible but severe downside scenario[s] particularly whether those downside scenario reflect plausible impacts on the University.
- Evaluated whether sufficient and appropriate audit evidence has been obtained to conclude whether a material uncertainty exists and the appropriateness of management's use (or otherwise) of the going concern basis of accounting.
- Evaluated whether there is adequate support for the assumptions underlying management's assessment, whether they are realistic and achievable and consistent with the external and/or internal environment and other matters identified in the audit
- Challenged management's plans for future actions, and verified the reliability and relevance of data used. Determined whether the outcome of these plans is likely to improve the situation and whether management's plans are feasible.
- Evaluate whether the disclosures in the annual report describe the principal risks and explain how these are mitigated

Audit risks and our audit approach (cont.)

3

Going Concern

Risk relating to disclosures related to going concern including the judgement of whether there is material uncertainty



Other audit risk

- Management's assessment of the entity's ability to continue as a going concern involves significant judgment with respect to student recruitment in future years.
- There is currently significant financial challenges across the higher education sector, with a number of Universities noting financial pressure. The University are forecasting to report a operating deficit position of c£10m in the current year, due to pressures on recruitment, and are working to mitigate the risks through restraining discretionary spend.
- The University continues to maintain healthy cash reserves with a cash and cash equivalents balance of c£375m as at 31 July 2023, and strong operating cash flows and continues to monitor their working capital requirements based on their development and organisational needs.
- There is a risk that disclosures in the financial statements and the annual report are not adequate with regard to the effect of the risks on the entity's financial position, performance, business model and strategy.



Our findings

Our work in this area remains ongoing at present.

- To date, we have not identified any events or conditions that would cast doubt on the ability of the University to continue as a Going Concern.
- There remains significant challenges across the sector and we note the University has reported a small deficit before other gains and losses of £3.1m after adjusting for the one off USS release. The University continues to generate cash from operating activities in the year. We note the University has significant cash balances, with over £260m in Cash and Cash Equivalents and £60m in current investments as at 31 July 2024.
- Management have performed a going concern assessment, which is provided to both the Audit, Risk and Compliance Committee and Finance Committee. The paper provides a detailed analysis that includes:
 - Consideration of forecast bank covenant compliance, future cashflows and financial forecasts based on submissions to the OfS
 - Reverse stress testing scenarios, to note the conditions required for a breach of covenant or for the University to require an overdraft
 - Modelling of downside scenarios, including a decrease in international fees by £100m and increase in staff costs by 5%.

Our review and documentation of this assessment is ongoing, however, no issues are noted to date.

Audit risks and our audit approach (cont.)

4

Valuation of land

An inappropriate amount is estimated and recorded for the land subject to valuation



Other audit risk

The University adopts a revaluation policy in relation to freehold and long leasehold land.

Buildings are reflected in the financial statements at cost less accumulated depreciation. However, they are included within the valuation report provided by the University valuer, Gerald Eve. For the purpose of the audit, we consider the risk to be associated with the valuation of land as the buildings do not impact the financial statements.

Valuations are inherently judgmental. There is a risk that the methodology, assumptions and underlying data, are not appropriate or correctly applied.

The value of the University's land at 31 July 2023 was £827.9m.



Our response

We will perform the following procedures:

- We critically assessed the independence, objectivity and expertise of the external valuer appointed by the University to develop the valuation of the land as at 31 July 2024;
- We compared the accuracy of the data provided to the valuers for the development of the valuation to underlying information to previous valuations, challenging management where variances are identified;
- We considered the carrying value of the land; including any material movements from the previous revaluations. We will challenge key assumptions within the valuation, including the use of relevant indices and assumptions, as part of our judgement;
- We performed inquiries of the valuers in order to verify the methodology that was used in preparing the valuation and whether it was consistent with the requirements of the RICS Red Book and the SORP;
- We agreed the calculations performed of the movements in value of land and buildings and verify that these have been accurately accounted for in line with the requirements of the SORP; and
- Disclosures: We considered the adequacy of the disclosures concerning the key judgements and degree of estimation involved in arriving at the valuation.

Note – during the course of the audit, the procedures noted above were refined to respond to the risk associated with the valuation of land. The procedures above reflect the final testing performed over the identified risk

Key:

 Prior year  Current year



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Audit risks and our audit approach (cont.)

4

Valuation of land

An inappropriate amount is estimated and recorded for the land subject to valuation



Other audit risk

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Buildings are reflected in the financial statements at cost less accumulated depreciation. However, they are included within the valuation report provided by the University valuer, Gerald Eve. For the purpose of the audit, we consider the risk to be associated with the valuation of land as the buildings do not impact the financial statements.

Valuations are inherently judgmental. There is a risk that the methodology, assumptions and underlying data, are not appropriate or correctly applied.

The value of the University's land at 31 July 2023 was £827.9m.



Our findings

- We held initial meetings with the valuer to consider the qualifications, independence and objectivity of the valuer and did not identify any issues. We noted the approach remains consistent with the prior year and in line with the requirements of the RICS Red Book and SORP.
- We have currently received the draft calculations of the valuation, with the final report outstanding. Based on the information received to date and testing completed, we noted:
 - The data within the valuation is materially consistent with the data from the prior year. This is consistent with our expectation as there have been no significant land acquisitions.
 - The value of the land is consistent with the prior year, with only minor updates to the valuation. Based on review of alternative land indices / external data, we would not anticipate significant movement in the valuation of the land and therefore we consider the assumptions to be reasonable as the valuation falls within our expected range.
- Our testing has identified further queries, which we will follow up with the valuer. We are currently completing our analysis of the data and will follow up on inquiries prior to the Audit, Risk and Compliance Committee. We will provide a verbal update at the meeting.

Outstanding Procedures

- Receipt of the final report from the valuer and final review of the disclosures relating to the valuation.
- Follow up on inquiries based on analysis of the draft valuation calculations.

Key:

Prior year Current year



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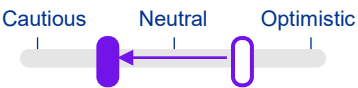
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Key accounting estimates and management judgements – Overview

Our view of management judgement

Our views on management judgments with respect to accounting estimates are based solely on the work performed in the context of our audit of the financial statements as a whole. We express no assurance on individual financial statement captions.



Asset/liability class	Our view of management judgement	Balance (£m)	YoY change (£m)	Our view of disclosure of judgements & estimates	Further comments
Valuation of Freehold Land	<div><div>CautiousNeutralOptimistic</div><div><div></div><div></div><div></div><div></div><div></div></div></div>	527.3	-	<div><div>Needs improvementNeutralBest practice</div><div><div></div><div></div><div></div><div></div><div></div></div></div>	<p>Our work over the valuation of land remains ongoing. The current draft valuation report does not indicate a significant movement to the prior year. We have considered the movement against indices for land values within Central London and consider the movement in valuation to be in line with these indices.</p> <p>We have not identified any issues with the disclosures within the financial statements, although will conclude our review on receipt of the final report.</p>

Key:
 Prior year Current year



Our findings on other matters relevant to the entity

Annual report

We are yet to receive a copy of the Annual Report and therefore not been able to review this ahead of the Audit, Risk and Compliance Committee.

We will provide a verbal update to the Committee on our progress once the document is received.

Prior Year Restatement

King's College London have included a restatement of the prior year comparative information in relation to the emoluments of the Vice Chancellor & President. Whilst the impact of the restatement is not material, management have processed the adjustment to aid comparability.

We have not identified any issues with the restated disclosure

Matters on which we are required to report by exception

Access and Participation

We are required by the Accounts Direction to report to you where the University has an access and participation plan that has been approved by the Office for Students' director of fair access and participation and the results of our audit work indicate that the Group's and the University's expenditure on access and participation activities for the financial year disclosed in Note 9 has been materially misstated.

We have nothing to report in these respects

Grant and Fee income

We are also required by the Accounts Direction to report to you where the results of our audit work indicate that the Group's and the University's grant and fee income, as disclosed in note 5 to the financial statements has been materially misstated.

We have nothing to report in these respects.

Audit Fees

Our fee for the audit for the year ended 31 July 2024 was £320,000 plus VAT (£126,000 in 2022/23).

We have also completed non audit work at the University during the year relating to corporation and other tax advice and have included in appendix 4 confirmation of safeguards that have been put in place to preserve our independence.

Independence and Objectivity

ISA 260 also requires us to make an annual declaration that we are in a position of sufficient independence and objectivity to act as your auditors, which we completed at planning and no further work or matters have arisen since then.

Use of funds

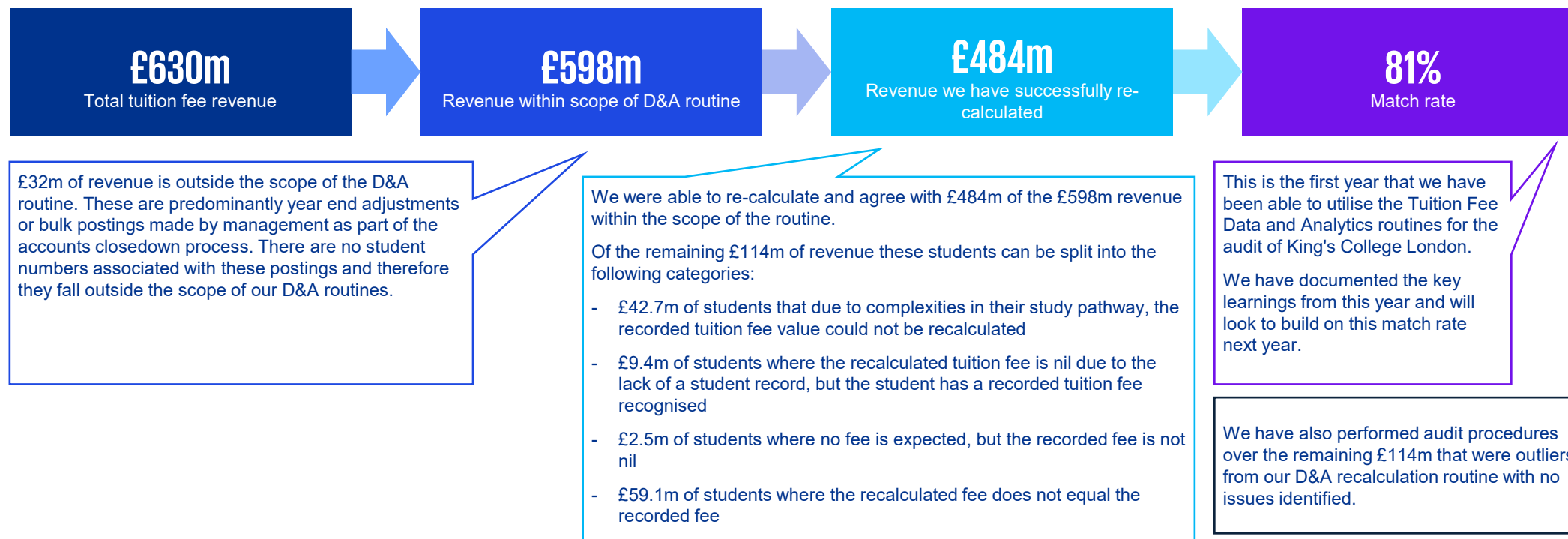
As the University receives funding from the Office for Students and Research England, we are required to provide an opinion as to whether public sector funding received has been utilised in accordance with the associated terms and conditions. We have set out below a summary of the work performed and findings from our work:

Risk assessment	Controls	Substantive procedures
<p>We compared the financial performance for the year to budget and the cause of variances.</p> <p>We inspected the University's correspondence with the Office for Students during the year.</p> <p>We inspected the reports produced by internal audit during the year to consider whether there were any matters raised that may demonstrate funds were not used appropriately.</p> <p>We confirmed that there are appropriate policies and procedures in place, including provision of whistleblowing and anti-fraud and bribery requirements.</p> <p>We considered how the University had assessed its compliance with the requirements of the Committee of University Chairs code of practice for setting the remuneration of the head of provider.</p>	<p>We assessed whether there were appropriate controls in place for the management of expenditure, including findings from our payroll and non-pay expenditure work.</p> <p>We have identified control recommendations in relation to both the new starter and leavers control at the University. WE have assessed these recommendations and findings in relation to our use of funds opinion and do not deem this to have a significant impact on our audit approach.</p> <p>We confirmed that an up-to-date register of interests was in place and whether there had been any transactions with related parties during the year. No risks were identified relating to transactions with related parties.</p>	<p>As part of our substantive audit procedures, we undertook sample testing of research income and expenditure. We confirmed that expenditure incurred against funding received was utilised for appropriate purposes and didn't identify an exceptions as part of this testing.</p> <p>Our work in this area remains ongoing at present, including the finalisation of our journals testing to address the management override of controls risk.</p>

We have not identified any matters that would require us to modify our opinion in respect of use of funds/provide details of exceptions and impact on our opinion.

Tuition Fee D&A – Summary of Findings

We have performed a Data and Analytics (D&A) routine to recalculate a significant portion of the tuition fee revenue. The summary of our findings are set out below.



Key takeaways for Audit, Risk and Compliance Committee members

- We have been able to gain assurance that the vast majority of the University's tuition fee revenue has been correctly recognised, with audit procedures in place over the revenue we have not been able to re-calculate.








Appendix

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Accounting update – amendments to FRS 102	30
2024 AQR Results	32

Required communications with the Audit, Risk and Compliance Committee

Type	Response
Our draft management representation letter	 We have not requested any specific representations in addition to those areas normally covered by our standard representation letter for the year ended 31 July 2024.
Adjusted audit differences	 There was one adjusted audit differences with a profit impact of nil and one disclosure adjustment. See page 27 for further information.
Unadjusted audit differences	 There were no unadjusted audit differences.
Related parties	 There were no significant matters that arose during the audit in connection with the entity's related parties.
Other matters warranting attention by the Audit Committee	 There were no matters to report arising from the audit that, in our professional judgment, are significant to the oversight of the financial reporting process.
Control deficiencies	 We communicated to management in writing all deficiencies in internal control over financial reporting of a lesser magnitude than significant deficiencies identified during the audit that had not previously been communicated in writing.
Actual or suspected fraud, noncompliance with laws or regulations or illegal acts	 No actual or suspected fraud involving group or component management, employees with significant roles in group-wide internal control, or where fraud results in a material misstatement in the financial statements identified during the audit.

Type	Response
Significant difficulties	 No significant difficulties were encountered during the audit.
Modifications to auditor's report	 None.
Disagreements with management or scope limitations	 The engagement team had no disagreements with management and no scope limitations were imposed by management during the audit.
Other information	 We await a copy of the Annual Report from management to conclude whether it is materially consistent. We will provide an update to the Audit, Risk and Assurance Committee in relation to this.
Breaches of independence	 No matters to report. The engagement team have complied with relevant ethical requirements regarding independence.
Accounting practices	 Over the course of our audit, we have evaluated the appropriateness of the Group's accounting policies, accounting estimates and financial statement disclosures. In general, we believe these are appropriate.
Significant matters discussed or subject to correspondence with management	 No significant matters arose from the audit were discussed, or subject to correspondence, with management.

Recommendations raised and followed up

The recommendations raised as a result of our work in the current year are as follows:

Priority rating for recommendations			
1		Priority one: issues that are fundamental and material to your system of internal control. We believe that these issues might mean that you do not meet a system objective or reduce (mitigate) a risk.	
2		Priority two: issues that have an important effect on internal controls but do not need immediate action. You may still meet a system objective in full or in part or reduce (mitigate) a risk adequately, but the weakness remains in the system.	
3		Priority three: issues that would, if corrected, improve the internal control in general but are not vital to the overall system. These are generally issues of best practice that we feel would benefit you if you introduced them.	

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date
1	3	<p>Delay in Starters Checklist</p> <p>During the course of our interim testing, we identified one starter that had commenced employment and work on 1st June, however the information was not provided to payroll in order for the individual to be paid in the June payroll run. The individual in question was subsequently paid in the July 2024 payroll run.</p> <p>Impact</p> <p>Late notification of starters to payroll may lead to additional or faster payments being required in the months following, or spikes in payroll runs where a significant number of individuals miss the payroll cut off.</p> <p>Recommendation</p> <p>We recommend that management ensure information is provided on a timely basis to allow new starters to be paid in the appropriate payroll run.</p>	<p>The HR/Payroll teams will review the process for new starters to ensure the information is provided on a timely basis. A lot of the time it is down to the new starter to update their information in the Payroll system, so line managers need to ensure this is done in a timely manner</p>

Recommendations raised and followed up (cont.)

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date
2	3	<p>Error in Contract Leave Date</p> <p>During the course of our interim testing, we identified one leaver where an incorrect end date (a previous contract extension had been added into the system. This resulted in an overpayment being made to the employee.</p> <p>Impact</p> <p>Incorrect contract end dates could lead to additional overpayments being made to employees once their contract of employment has ended, resulting in additional costs to the University and potential issues with the recoverability of overpayments.</p> <p>Recommendation</p> <p>We recommend that end dates are checked when being input into the system to ensure an accurate calculation of final salary is made.</p>	The HR/Payroll teams will review the process for leavers to ensure the accuracy of the information and that it is provided on a timely basis.
3	2	<p>Update Documentation in Relation to Hedge Accounting</p> <p>The University prepared hedge accounting documentation in 2011-12 to demonstrate compliance with US GAAP accounting standards. Whilst the core documentation remains appropriate for the FRS102 financial statements, there are differences which should be updated and addressed, with the updated hedge documentation approved at an appropriate committee. Ensuring appropriate documentation is maintained is a requirement of FRS102 to enable hedge accounting.</p> <p>Impact</p> <p>Ensuring appropriate documentation is maintained is a requirement of FRS102 for hedge accounting, which allows the movement in the derivative fair value to be recognised through Other Comprehensive Income.</p> <p>Recommendation</p> <p>We recommend that the University updates the documentation and obtains approval from a relevant Committee.</p>	We will update the hedge documentation to be presented at the Finance Committee and Audit, Risk & Compliance Committee in June 2025 for approval.

Recommendations raised and followed up (cont.)

We have also followed up the recommendations from the previous year's audit, in summary:

Total number of recommendations	Number of recommendations implemented	Number outstanding (repeated below):
7	4	3

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date	Current Status (November 2024)
1	2	<p>Management review of journals</p> <p>There continues to be no evidenced formal process to review journals as staff are allowed to post journals without them being approved. We recognised that the current general ledger does not allow for efficient automated journal authorisation controls.</p> <p>We recommend a monthly control document is used to evidence management's approach to reviewing journals on a monthly basis e.g. all journals over a set level.</p> <p><u>December 2023 update</u></p> <p>Management made a decision not to include the requirement for journals to require approval as posting is restricted to specific staff. We recommend that a formal month end review process is undertaken to review postings made. This could include postings to unusual accounts, round sum amounts, or staff who process relatively few journals.</p>	<p>There is a formal policy in Financial Accounts to review journals on a monthly basis which are >£100k, posted outside of working days and by infrequent posters. We will ensure this policy is reviewed, updated where necessary, and documented each month.</p>	<p>Whilst management have a formal policy in place to retrospectively review journals posted on a monthly basis, we have been unable to rely on this for audit purposes as the review takes place following the journals being recorded in the general ledger. The control in place also only covers a sub-set of journals over a set monetary threshold.</p>

Recommendations raised and followed up (cont.)

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date	Current Status (November 2024)
2	2	<p>Research Income – work in progress</p> <p>The research work in progress (WIP) balance included 178 projects with no movement in the year, totalling £2.3m. There is a risk that the WIP is related to old projects with no prospect of future income or receipts, so is not recoverable.</p> <p>The University hold monthly meetings to provide updates on ongoing projects, which would include projects with long term outstanding WIP. We recommend the University perform a documented exercise to review these older balances for recoverability, alongside the research team, and make appropriate closures or adjustments to older projects.</p>	<p>The RMID team have implemented a tracker highlighting non-moving balances since July 2021 with a RAG rating. The Research Grants Manager and Administrator are listed, and notes/comments are made against each non-moving balance with explanations for the non-movement or actions to clear. The report is in the early stages, but it is to be updated each month and reviewed regularly. We also reviewed the top 5 WIP balances against available funding left on grants and in all cases there was sufficient balance to fund the WIP.</p>	<p>The audit team have performed a review of aged WIP during the period. There were 275 research projects with accrued income balances that hadn't moved since the prior year, with a total value of c. £5.1m. Of the sample selected all accrued income balances on research projects that had not moved during the year were found to be errors (3 x research projects selected). Whilst these were identified as errors, their total value falls below the reporting threshold for reporting to the Audit, Risk and Compliance Committee.</p> <p>Due to the presence of these errors, we deem this recommendation to remain open.</p> <p>Recommendation remains open</p>
3	2	<p>Research Income – strengthening of control documentation</p> <p>We considered the design and implementation of controls for monitoring research income, and specifically for allocating and monitoring overhead costs to research projects.</p> <p>Project monitoring happens at various levels in the University, and includes one to one meetings between the Faculty based Research Management teams and Project Leads (Principle Investigators). Meeting records are not centrally maintained. Therefore we have been unable to rely on the controls in place.</p> <p>We recommend that the University introduce a monitoring system to confirm financial reviews monitoring actual income and expenditure compared to budgeted income and expenditure have been performed for each research project at appropriate intervals, and identify projects where reconciliations have been missed.</p>	<p>RMID & Faculty Research Management staff will look to implement a monitoring system to confirm financial reviews monitoring actual income and expenditure compared to budgeted income and expenditure are performed for each research project at appropriate intervals for that project.</p>	<p>The audit team have met with the Research Finance team throughout the year to identify any additional controls in place in regards to the monitoring of research projects. Whilst movement against the recommendation can be evidenced, these controls fall under "Management Review Controls", which require a significant amount of user subjectivity, and therefore cannot be relied upon for audit purposes.</p> <p>We can evidence that the University has a process and reports available to it to monitor research projects however audit reliance cannot be placed on such controls.</p> <p>Recommendation closed</p>

Recommendations raised and followed up (cont.)

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date	Current Status (November 2024)
4	2	<p>Staff costs – unsigned contracts</p> <p>We performed sample testing of staff costs in year. As part of this test we request signed contracts to support confirmation that the employee exists and is in employment with King's.</p> <p>When testing the sample there were instances where the University were unable to provide a signed contract.</p> <p>The requirement for a new member of staff to upload their signed contract to the People XD system is mandated for all staff and is given in the terms and conditions of employment. We recommend that a control to confirm this has been done by the HR/Payroll department within one week of joining King's is introduced.</p>	HR/Payroll department will review the process that is currently in place for signed contracts and look to tighten the controls around this.	<p>As part of the interim audit, a sample of new starters during the year was selected for the purpose of controls testing.</p> <p>No issues were identified with contracts not being signed. We therefore deem this control recommendation to be closed.</p> <p>Recommendation closed</p>
5	2	<p>Property, Plant & Equipment (PPE) – additions</p> <p>For one item in our sample of additions to tangible and intangible fixed assets, the information to support the addition was not retained on Business World. The addition related to an MRI scanner and of value £276,030. There is a risk that documentation for capitalisation of assets is lost when there is turnover in staff within the finance and estates teams.</p> <p>We recommend a policy is introduced to attach supporting documents for capitalisation of assets to Business World alongside the fixed asset register and general ledger transactions. This could include evidence of purchase such as invoices and related correspondence.</p>	<p>The Financial Accounts team will be reviewing the current process for capitalising additions to tangible and intangible assets going forward. For this particular item there was backing documentation attached to the journal in Business World in the form of an email chain, however we will explore a way of retaining more meaningful documentation in the system.</p> <p>The Financial Accounts team will look into the fixed asset process to determine whether physical verification is possible. It is deemed difficult due to the multiple locations across the campus and shared spaces.</p>	<p>As part of our fixed assets existence testing, we selected a sample of five assets from the equipment ledger in order to trace back for physical verification purposes. The level of detail and granularity within the Fixed Asset Register meant that this could not be completed.</p> <p><u>Additional recommendation</u></p> <p>As a result of this, we also recommend management complete an asset verification exercise in 2024/25.</p> <p>Recommendation remains open</p>

Recommendations raised and followed up (cont.)

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date	Current Status (November 2024)
6	2	IT – Disaster Recovery Plan/Cloud Backup Policy When completing audit procedures to understand IT processes in place at the University it was identified that the IT Disaster Recovery Plan/Cloud Backup Policy was out of date. The outdated policy may present a risk to internal control. This was mitigated in year by the policy not requiring use, We recommend that the policy is reviewed and updated to reflect current processes at the University.	IT will review and update the policy where necessary.	No further issues have been identified through our review of IT related policies in place at the University. We therefore deem this recommendation to be closed. Recommendation Closed
7	3	Related Parties Disclosures The University applies a de minimis threshold to disclosed related party transactions. We recommend that this threshold is removed, so that all related party transactions are disclosed in the financial statements.	We will ensure there is no de minimis threshold applied in 2023/24.	Management during the year have responded to the recommendation and not applied a de minimis threshold to the related party disclosure in the 2023-24 financial statements. Recommendation Closed

Audit Differences

Under UK auditing standards (ISA (UK) 260) we are required to provide the Audit, Risk and Compliance Committee with a summary of unadjusted audit differences (including disclosure misstatements) identified during the course of our audit, other than those which are 'clearly trivial', which are not reflected in the financial statements. In line with ISA (UK) 450 we request that you correct uncorrected misstatements. However, they will have no effect on the opinion in our auditor's report, individually or in aggregate. As communicated previously with the Audit, Risk and Compliance Committee, details of all adjustments greater than £1,250K. We have no unadjusted audit differences to report.

Under UK auditing standards (ISA (UK) 260) we are required to provide the Audit, Risk and Compliance Committee with a summary of adjusted audit differences (including disclosures) identified during the course of our audit. The adjustments below have been included in the financial statements.

Adjusted audit differences (£'000s)				
No.	Detail	SOCI Dr/(cr)	SOFP Dr/(cr)	Comments
1	Dr Other Comprehensive Income	7.1		- Through the review of the loan balances held by the University, it was identified that a hedging arrangement was in place on the Natwest £60m unsecured loan facility, although no corresponding derivative was recorded within the financial statements. The purpose of this adjustment is to record the fair value of the derivative as at 31 July 2024. Note – as part of the adjustment, a number of corresponding disclosure adjustments, including updates to the accounting policy, financial instrument note and long term creditors note were also required.
	Cr Interest Rate Swap Derivative	-	(7.1)	
Total		£7.1	(£7.1)	

Disclosure adjustments (corrected):

- Remuneration Disclosures (Key Management Personnel). We identified one individual in the key management personnel disclosure that had been disclosed at an incorrect band. This has since been corrected in the latest version of the financial statements.

Confirmation of independence

We confirm that, in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and that the objectivity of the Partner and audit staff is not impaired.

To the Audit, Risk and Compliance Committee members

Assessment of our objectivity and independence as auditor of King's College London (the University)

Professional ethical standards require us to provide to you at the completion stage of the audit a written disclosure of relationships (including the provision of non-audit services) that bear on KPMG LLP's objectivity and independence, the potential threats to KPMG LLP's independence that these create, any safeguards that have been put in place and why they address such threats, together with any other information necessary to enable KPMG LLP's objectivity and independence to be assessed.

This letter is intended to comply with this requirement and facilitate a subsequent discussion with you on audit independence and addresses:

- General procedures to safeguard independence and objectivity;
- Independence and objectivity considerations relating to the provision of non-audit services; and
- Independence and objectivity considerations relating to other matters.

General procedures to safeguard independence and objectivity

KPMG LLP is committed to being and being seen to be independent. As part of our ethics and independence policies, all KPMG LLP partners and staff annually confirm their compliance with our ethics and independence policies and procedures including in particular that they have no prohibited shareholdings. Our ethics and independence policies and procedures are fully consistent with the requirements of the FRC Ethical Standard.

As a result, we have underlying safeguards in place to maintain independence through:

- Instilling professional values
- Communications
- Internal accountability
- Risk management
- Independent reviews

We are satisfied that our general procedures support our independence and objectivity

Independence and objectivity considerations relating to the provision of non-audit services

Summary of non-audit services

We have reviewed all non-audit services provided to the University and its connected parties in the financial period to date and identified those that may have a bearing on our independence. Facts and matters related to the provision of non-audit services that may bear upon our independence, are set out in the following table.

Description of scope	Threats to independence	Safeguards applied	Value of service and basis of fee
Corporation Tax	Self-Review threats would arise where our corporation tax work is relied upon during our audit procedures.	The service will be provided by KPMG professionals who are not members of the audit team.	£25,000
		Management are to provide any inputs into calculations and will provided significant oversight during the performance of the service.	The fee includes the preparation of corporation tax returns and the statutory iXBRL return. The fees have not changed significantly from the prior year.
US Loans reporting	None identified	Work is completed following the signing of the financial statements and fee is low compared to the audit fee	£15,000



Confirmation of independence (cont.)

We have considered the fees charged by us to the Group and its affiliates for professional services provided by us during the reporting period. Total fees charged by us can be analysed as follows:

	2023/24 (to date)	2022/23
	£'000	£'000
Audit of King's College London	296	111
Audit of subsidiaries	24	15
Total audit	320	126
US Loans and other certifications	15	17
Taxation Services	25	25
Total non-audit services	40	42
Total Fees	360	168

Fee ratio

The ratio of non-audit fees to audit fees for the year was 0.1: 1.

Contingent fees

We confirm that we have complied with the FRC Ethical Standard's prohibition on charging contingent fees for non-audit services to or in respect of an audited entity.

Independence and objectivity considerations relating to other matters

There are no other matters that, in our professional judgment, bear on our independence which need to be disclosed to the Audit, Risk and Compliance Committee.

Other Considerations

Fee level

We do not consider that the objective, reasonable and informed third party would conclude that it is probable that our independence would be compromised by the level of the audit fee.

Confirmation of audit independence

We confirm that as of the date of this letter, in our professional judgment, KPMG LLP, each member of the audit engagement team, and anyone else within the Firm who can influence the conduct or outcome of this audit engagement is independent within the meaning of regulatory and professional requirements.

This report is intended solely for the information of the Audit, Risk and Compliance Committee and should not be used for any other purposes.

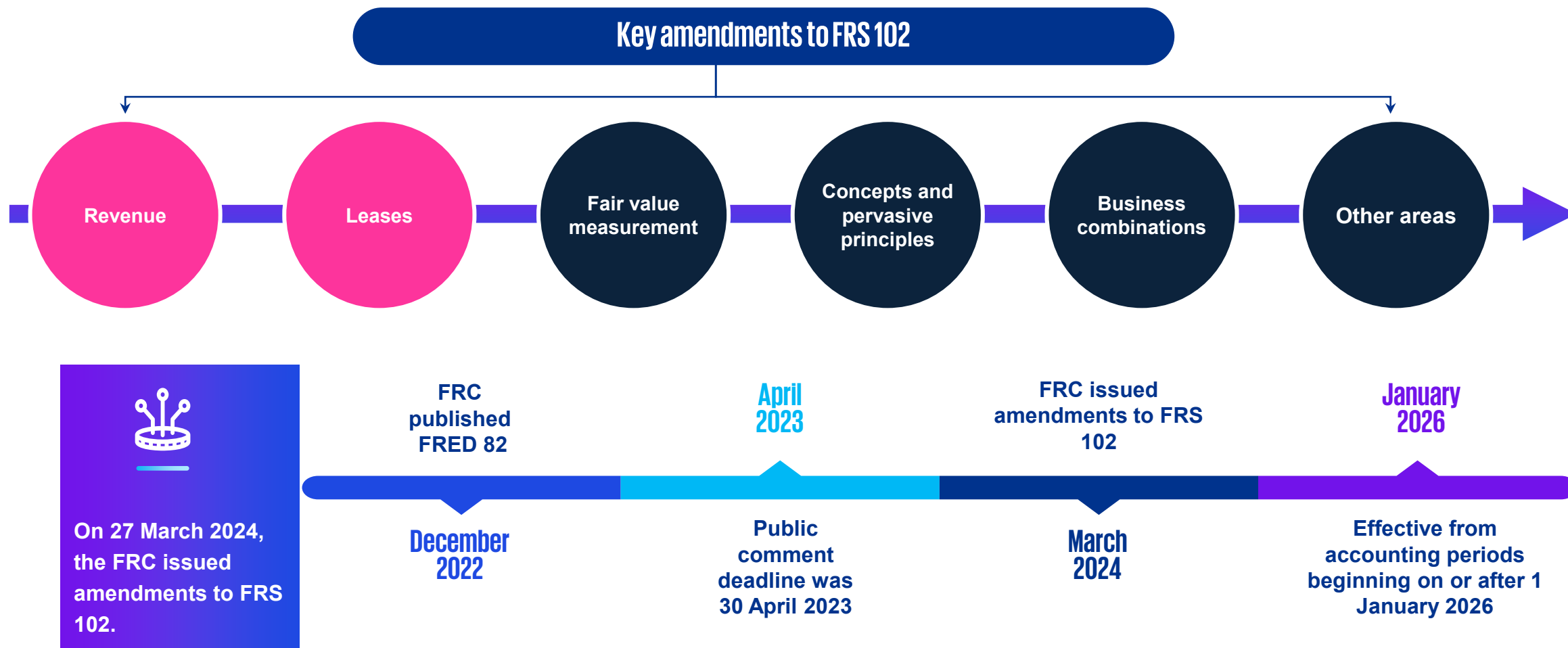
We would be very happy to discuss the matters identified above (or any other matters relating to our objectivity and independence) should you wish to do so.

Yours faithfully

KPMG LLP



Accounting update – amendments to FRS 102



Accounting update – amendments to FRS 102 (cont.)

Changes may have a significant impact on your statement of comprehensive income and balance sheet.



Leases

- Alignment to IFRS 16 Leases.
- On-balance sheet lease accounting for lessees (right-of-use asset and lease liability).
- Exemptions for short-term and low-value leases (additional guidance on 'low-value' compared to IFRS).
- Optional simplifications for discount rates (e.g. obtainable borrowing rate rather than incremental borrowing rate), multiple components and variable payments.



Revenue

- Alignment to IFRS 15 *Revenue from Contracts with Customers*.
- Accounting policy choice for costs to obtain a contract.
- Simplified decision tree for license revenue recognition.



Certain simplifications made to IFRS



Non-retrospective transition approach only (unlike IFRS)

Other amendments to consider:

01

Fair value measurement



02

Intangible assets



04

Non-exchange transactions for public benefit entities



05

Borrowing costs



03

Heritage assets

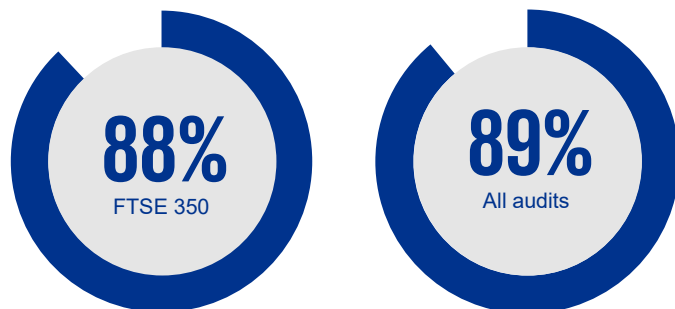


06

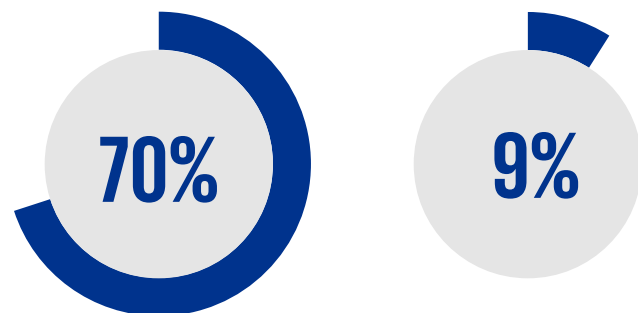
Related party disclosures



2024 AQR results



Percentage of our audits rated 'good' or 'limited improvements required' by AQR



KPMG audits rated 'good' or 'limited improvements required' by QAD

Proportion of AQR scope audit engagements reviewed

Key findings	Our response	Good practice identified
Estimates "Improve the quality and consistency of the audit of estimates, particularly for impairment assessments and expected credit loss provisions."	Increased specialist support and a dedicated impairment triage process, together with additional training and guidance and improvements to our work papers are reducing the findings we have in this complex topic and leading to areas of good practice.	At an engagement level areas of good practices were identified including: <ul style="list-style-type: none"> • Risk assessment and planning including lease accounting and inventory; • Challenge of management; • Use of specialists; • Group audit oversight; • Testing of controls; and • Challenge by the Engagement Quality Control Reviewer. Good practices were identified in various areas at the firm level including independence monitoring, training and methodology and the single quality plan and quality initiatives.
Risk Assessment "Improve the quality and consistency of risk assessment and response to internal control deficiencies."	We've enhanced our risk assessment procedure library and issued a standard work paper for teams to use when they identify findings related to GITCs and take a substantive approach to the audit as a result to make sure the impact on of these findings on the audit approach is well documents. Risk assessment has been a core part of our audit university for 2024 to respond to these findings.	

The Audit Quality Review (AQR) team of the Financial Reporting Council (FRC) undertakes independent inspections of the overall quality of the audit work of those UK audit firms that audit listed and other major public interest entities. The AQR inspections involve a number of file reviews at each firm visited. The result of these file reviews are summarised into three main categories as follows:

- Good or limited improvements required;
- Improvements required;
- Significant improvements required





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(Letterhead of the Entity we audit)

KPMG LLP
15 Canada Square
London
E14 5GL

[Date]

Dear Rees

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 31 July 2024, for the purpose of expressing an opinion:

- i. as to whether these financial statements give a true and fair view of the state of the Group's and of the University's affairs as at 31 July 2024 and of the Group's and of the University's income and expenditure, gains and losses, changes in reserves and of the Group's cash flows for the financial year then ended;
- ii. whether these 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* ("FRS 102").

These financial statements comprise the Group and University Balance Sheets, the Group and University's Statement of Comprehensive Income and Expenditure, the Group and University's Statements of Changes in Reserves, the Group Cash Flow Statement 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 that, 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 26 January 2024, for the preparation of financial statements that:
 - i. give a true and fair view of the state of the Group's and of the University's affairs as at the end of its financial year and of the Group's and of the University's income and expenditure, gains and losses and changes in reserves, and of the Group's cash flows, for that financial year then ended;
 - ii. have been properly prepared in accordance with UK Accounting Standards, including FRS 102.

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

2. The methods, the data and the significant assumptions used in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in the context of the applicable financial reporting framework.

3. All events subsequent to the date of the financial statements and for which section 32 of FRS 102 requires adjustment or disclosure have been adjusted or disclosed.
4. In respect of the restatement of the emoluments of the Vice-Chancellor and President, made to correct a material misstatement in the prior period financial statements relating to the disclosure of benefits associated with accommodation and tax on accommodation, the Council confirms that the restatement is appropriate.

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.
8. 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, and we believe we have appropriately fulfilled those responsibilities.
9. 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.

10. The Council has disclosed to you and has appropriately accounted for and/or disclosed in the financial statements, in accordance with section 21 of FRS 102 all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.
11. 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 section 33 of FRS 102.

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.

12. The Council confirms that:

- a) The financial statements disclose all of the matters that are relevant to the University's and Group's ability to continue as a going concern, including key risk factors, assumptions made and uncertainties surrounding the University's and the 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 uncertainties related to events or conditions exist that may cast significant doubt on the ability of the University and the Group to continue as a going concern.

13. 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 defined benefit obligations are consistent with its knowledge of the business and in accordance with the requirements of section 28 of FRS 102.

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, curtailments and settlements have been identified and properly accounted for. [S](#)

14. To the best of our knowledge and belief the Group and 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.
15. The Council are not aware of any issues relating to the Group and University's other Office For Students or Research England funding streams which may lead to a clawback in funding.
16. To the best of our knowledge and belief the Group and 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.

17. To the best of our knowledge and belief the Group and University has complied with the terms and conditions of any revenue grant 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.
18. 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 2024.
19. The Council further confirms:
 - to the best of our knowledge and belief the Group and University has complied with the Office for Students (OfS) guidance for access and participation spend and any spend classified as access and participation spend is in accordance with this guidance.
 - the Council confirms that costs or credits attributable to the agreement of a deficit recovery plan for the Universities Superannuation Scheme (USS) and/or Superannuation Arrangements of the University of London (SAUL) 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 and/or SAUL membership changes during the life of the plan are consistent with the Group and 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 Group and University's estate.
 - there are no issues arising from the finalisation of student data for the year ending 31 July 2024 which has been used to produce the University's 2024 HESA return/re-creation of HESES24 which would have a material impact on teaching funding from the Office for Students or English undergraduate fee income recognised in the financial statements.
 - 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 2023 to 31 July 2024.
 - to the best of its knowledge and belief the Group and University has disclosed details of all heritage assets in accordance with Section 34 of FRS 102. It confirms that all donated heritage assets have been valued appropriately in accordance with the requirements of Section 34.

- 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 2024 other than as disclosed to you.
- All trades in complex financial instruments are in accordance with our risk management policies, have been conducted on an arm's length basis and have been appropriately recorded in the accounting records, including consideration of whether the complex financial instruments are held for hedging, asset/liability management or investment purposes. None of the terms of the trades have been amended by any side agreement and no documentation relating to complex financial instruments (including any embedded derivatives and written options) and other financial instruments has been withheld.
- All of the Group and 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.

This letter was tabled and agreed at the meeting of the Council on *[date]*.

Yours faithfully,

[Chairman]

[Secretary]

Optional cc: Audit Committee

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

Criteria for applying the disclosure exemptions within FRS 102 for the University's financial statements

- The University discloses in the notes to its financial statements:
 - a) A brief narrative summary of the disclosure exemptions adopted; and
 - b) The name of the parent of the group in whose consolidated financial statements its financial statements are consolidated, and from where those financial statements may be obtained

Financial Statements

A complete set of financial statements (before taking advantage of any of the FRS 102 exemptions) comprises:

- Group and University Balance Sheets as at the end of the period;
- a Group and University's Statement of Comprehensive Income and Expenditure for the period;
- a Group and University's Statements of changes in reserves for the period;
- a Group Cash Flow Statement for the period
- notes, comprising a summary of significant accounting policies and other explanatory information.

FRS 102 permits an entity either to present (i) separately a Profit and Loss account and a Statement of Other Comprehensive Income or (ii) a combined Profit and Loss Account and Other Comprehensive Income.

Material Matters

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

FRS 102 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 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.

King's College London Prevent Duty Report 2023/24

Section 1: Annual Report (internal only)

1. Introduction

- 1.1. The Students & Education Directorate, as the professional services directorate with accountability for the university's compliance with the Prevent Duty, is confident that King's continues to demonstrate a due regard for the Duty, which applies to the governing bodies or proprietors of 'relevant higher education bodies' (RHEBs).
- 1.2. The 2022/23 ADR was submitted to the Office for Students (OfS) in December 2023. In May 2024, the Executive Director of Students & Education, who is the university Prevent Lead, received notification from the Office for Students (OfS) that they had reviewed the information provided and had no queries about the College's 2022/23 ADR submission.
- 1.3. The information below sets out the university's Prevent Duty activity in 2023/24.

2. Management and Governance

- 2.1. The Academic Regulations, Quality and Standards (ARQS) team maintains oversight of the university's Prevent Duty obligations and monitors the Prevent Duty Risk Assessment and Action Plan, works in conjunction with Student Support and Wellbeing Services to organise staff training on Safeguarding and Prevent, and ensures policies and processes are updated accordingly. The Regulatory Compliance Manager is the officer for the Safeguarding Steering Group and the Safeguarding Oversight Group, which support Prevent Duty activity.
- 2.2. The Safeguarding Steering Group continues to meet twice a year and oversees compliance activity with the Prevent Duty, including the approval of updated policies and annual review of the Prevent Duty Risk Assessment and Action Plan. The Safeguarding Oversight Group meets four times a year and monitors operational aspects of delivering the Prevent Duty as well as wider Safeguarding activities at the College.
- 2.3. The KCLSU President is a member of the Steering Group and the Vice-President Welfare and Community is a member of the Safeguarding Oversight Group.¹ Colleagues in ARQS met with the KCLSU President and KCLSU Vice President in September 2023 to discuss how Safeguarding and Prevent is managed across the University. The KCLSU Vice President attended the Steering Group in October 2023. The Vice-President Welfare and Community was unable to attend meetings throughout the course of 2023/24, due to being absent from post. Due to this, it was difficult to maintain a consistent relationship with elected officers this year. A representative from KCLSU Advice is also a member of the Safeguarding Oversight Group to help with business continuity.
- 2.4. The [internal webpages on Safeguarding](#) and [the Prevent Duty](#) continue to be available to all staff and have been reviewed and updated as appropriate. The Prevent Duty Risk Assessment and

¹ For 2024-25, the Vice-President Welfare and Community will also be attending the Safeguarding steering Group in the absence of a KCLSU President.

Action Plan is monitored by ARQS and reviewed annually by the Safeguarding Oversight and Steering Groups.

3. Relationship with local partners

- 3.1. Regular contact is maintained with the Department for Education (DfE) Regional Prevent Coordinator for London, who provides advice on approaches to delivering the Duty and any concerns that have emerged. The Associate Director (Advice, Wellbeing & Welfare), who is Lead Safeguarding Officer (Enrolled Students) (LSO) maintains contact with this individual to provide further advice on any Prevent-related cases that arise. The Head of Academic Policy attends the London HE Prevent Networks organised by the DfE. The Strategic Director for Students and Education and Head of Security attended DfE and Local Authority specialist training sessions throughout the year. Information on best practice has been shared following all external events with relevant colleagues.
- 3.2. In June 2024, the updated Counter Terrorism Local Profile for London was received, and an overview was shared with the Safeguarding Steering Group. Islamic extremism continues to be the predominant risk and threat in London. There has not been a significant increase in Extreme Right-Wing Terrorism; however, most of the activity for both types of terrorism take place online as it is so accessible. Information on the Counter Terrorism Local Profile summary is built into the risk assessment, informing the University's action plan to ensure appropriate mitigations are in place. The review of the risk assessment continues to be informed by the OfS webinar on Prevent Duty Risk Assessments.
- 3.3. In addition to the business-as-usual activity, the Associate Director (Advice, Wellbeing & Welfare) and the Executive Director (Education and Students) met with the Department for Education London Coordinator to seek advice from the DfE on managing concerns relating to Freedom of expression and the Prevent Duty as a result of the Israel/Gaza conflict in October 2023. A working group was established that met weekly from October 2023-July 2024. The DfE Coordinator presented at this group.

4. Welfare and Referrals

Student

- 4.1. There were 9 cases referred through the Student of Concern Procedure during 2023-24. These cases are noted as follows:
 1. Right-wing ideology present. The student was known to statutory services. Support was offered and no further action was taken.
 2. No clear ideology present but concern about the student's interest in firearms. The concern was raised prior to the individual attending the university. A referral was made by King's and the case was escalated to Prevent. The student was suspended until statutory services could carry out their investigation. The student was contacted by the Prevent team and it was decided that no further action was necessary. The student attended study later in term.
 3. A KCLSU Society raised a concern about their safety on campus at the beginning of the Israel/Gaza crisis. The concerns were discussed, and support offered. No individuals/groups identified.

4. Two referrals were received about a student's behaviour towards external organisations. Liaison with the Police confirmed that they had closed the investigation as they believed that the student's email address had been hacked for malicious purposes. No further action necessary.
 5. Right-wing ideology present. The student had been referred to Prevent by their Further Education provider prior to attending King's. The Associate Director (Advice, Wellbeing and Welfare) attended the final Channel panel and agreed to offer ongoing support.
 6. A student was referred following an email sent to staff expressing concerns around the Israel/Gaza crisis. Further discussion with referrer showed no additional vulnerabilities or indicators that the student was at risk of radicalisation. No further action was taken.
 7. A student was referred following an email sent to staff that indicated an interest in right wing ideology. Further discussion with staff and student to explore the concerns showed no evidence of supporting right wing ideology or being at risk of being drawn into terrorism. Support offered around disclosed disability. No further action was taken.
 8. Two referrals were made during the Israel/Gaza crisis with concerns that a student was showing support for proscribed organisations. The student presented with multiple vulnerabilities and a referral was made by King's. The student was not invited to Channel, but support was put in place around their mental health and the referral closed.
 9. No clear ideology but threats to harm others. The student was supported by Mental Health Services, no escalation to Prevent as statutory assessment and support in place.
- 4.2. There were 3 concerns about student societies that came through the Report and Support Process in Autumn 2023. These related to the Israel/Gaza conflict and underwent a dual review by the Freedom of Expression Standing Advisory Group (FESAG) as well as the Lead Safeguarding Officer and Chief Safeguarding Officer for enrolled students.
- 4.3. In all three cases,
- the referrals raised concerns about the Student Societies showing support for the proscribed organisation, Hamas, via social media.
 - the allegations were reviewed by FESAG and considered under Prevent, and it was agreed that they did not meet the threshold of Freedom of Expression.
 - the Lead Safeguarding Officer and Chief Safeguarding Officer met with each society to explore Prevent concerns. It was agreed they did not meet the threshold for Prevent.
 - All cases have been dealt with by misconduct processes. One has been upheld. Two are awaiting the outcome of the investigation.

Staff

- 4.4. One concern was flagged by the Office for Students following a newspaper article released by the Times. The University carefully reviewed the information contained in the article and examined the Twitter feed of the staff member in question. The information referred to a single re-tweet, which was subsequently removed. It was agreed that the staff member was not supporting proscribed organisations or otherwise crossing a legal threshold. There was also no concern that the individual was at risk of being drawn into terrorism. Via the line management structure, support was offered to the individual, assurances about their academic freedom and our duty as a university to support

that were given while also noting to the staff member of their responsibility around use of social media and the various legal requirements for staff. A response was submitted to the Office for Students on 27th October 2023 outlining the actions taken.

5. Training

Face to Face

5.1. Staff training on Safeguarding and Prevent continues to cover an overview of the Duty as well as trends and ideologies and the use of online platforms. Included in the training material is the behaviour barometer, which was shared by the DfE as a resource, video content on Prevent produced by the Home Office, and information on how to report terrorist-related content to the Counter-Terrorism Police via the web or the iREPORTit app. The sessions also include myth-busting on Prevent and a spotlight on Incel culture. Each session includes case studies that are tailored to the group attending to ensure relevant discussion and application of King's Safeguarding and Prevent policy and procedures. In the period between 1st August 2023 and 31st July 2024, **152** members of staff attended face-to-face training held on MS Teams delivered by the Head of Welfare and the Regulatory Compliance Manager. The internal training is delivered on a 3-year basis. For 2023/24, this included:

- 28 colleagues from Residences, including Residence Welfare Leads and the Residence Welfare Manager
- 13 colleagues from the KCLSU Advice and Welfare team
- 37 Senior Tutors
- 11 members of the Chaplaincy
- 13 Wellbeing Advisors
- 5 members of Money & Housing
- 2 members of the Security Team
- 2 members from the Student Booking Team, King's Venues
- 41 colleagues from the faculty of Nursing, Midwifery and Palliative Care

5.2. Positive feedback was received internally on the training, which has been used to inform future sessions and relayed to the Safeguarding Oversight Group.

5.3. The SED Strategic Director (Student Support & Wellbeing Services) also completed two online external courses: Level 3 Safeguarding Adults and Level 3 Safeguarding Children.

King's E-learning

5.4. In 2023/24, 326 members of staff completed the Safeguarding at King's e-module and passed the test on LearnUpon. 133 of these staff members undertook both the e-learning and face to face training.

5.5. An updated version of the Safeguarding at King's e-module has been developed and is now available on WorkRite. It has been made a mandatory training for all staff and this will be rolled out over 2024/25.

6. External Speakers

- 6.1. The university continues to have oversight of student activity that involves external speakers coming onto campus. The joint KCL/KCLSU Freedom of Expression Standing Advisory Group (FESAG) continues to review high-risk external speaker requests, conduct risk assessments, and propose mitigations as appropriate. The policy on external speakers for all bookings , including those for faculty and departmental spaces can be found here [External Speakers Policy](#) and whilst Prevent is not referred to explicitly it comes under the regulatory responsibilities referred to in the document.
- 6.2. During 2023/24, there were **494** events that were processed through the external speakers risk assessment process by King's Venues. The total number of speakers risk assessed for these events was **1172**. **40** external speakers were approved with mitigations. There were no Prevent-related speakers that required any kind of mitigation. No external speakers for organised events were rejected during the year.
- 6.3. Due to the Israel/Gaza conflict that begun in October 2023, unease about the external environment, and a change of leadership within KCLSU during this time, there were challenges maintaining the dual risk assessment process with KCLSU. This will be reflected on in 2024/25 with an aim to make the whole risk assessment process for Societies, any student, and faculty staff more streamlined and transparent.
- 6.4. An encampment protest was established in response to the Israel/Gaza conflict and several external visitors were invited on to campus by students to participate in an educational programme that had been devised. These visitors were declined entry and the students referred to misconduct proceedings. A staff member that provided access to campus for an external visitor was also issued a formal warning.

Section 2: Data Return 2023/24 (to be submitted to the Office for Students)

Welfare					
Question	Islamist radicalisation	Extreme right-wing radicalisation	Mixed, unstable or unclear ideology	Other radicalisation	Total
i) Number of Prevent-related cases escalated to the point at which the Prevent lead has become involved	5	0	1	0	6
ii) Number of Prevent-related cases which led to informal external advice being sought from Prevent partners	1	0	1	0	2
iii) Number of formal external Prevent referrals	1	0	1	0	2
<p>For each Prevent-related case, please add information about how the case originated (e.g., concerns identified from behaviour online, or through accessing material online, through external speakers or as a result of a welfare issue). Maximum 300 words.</p>					
<p>Two individual students were referred to Prevent by King's following Student of Concern Procedure referrals:</p> <ul style="list-style-type: none"> One related to support for proscribed organisations from behaviour online and in-person discussions. They also presented with multiple vulnerabilities around their mental health. The second had no clear ideology but showed an interest in firearms. The concern was raised prior to the individual attending the university by the parent of another student who had seen some worrying messages on social media. <p>Three student societies were reported via the University's Report and Support tool. In all three cases,</p> <ul style="list-style-type: none"> The referrals raised concerns about the Student Societies showing support for the proscribed organisation, Hamas, via social media. The allegations were reviewed by the Freedom of Expression Standing Advisory Group and considered under Prevent. The Lead Safeguarding Officer and Chief Safeguarding Officer met with each society to explore Prevent concerns. It was agreed they did not meet the threshold for Prevent. All cases have been dealt with by misconduct processes. <p>One staff member was referred to the University by the Office for Students following an article released in the Times newspaper about social media posts. This was reviewed by the Prevent Lead and the Freedom of Expression Standing Advisory Group who agreed that this was not a Prevent concern, nor was the individual supporting proscribed organisations. A response was submitted to the Office for Students on 27th October 2023 outlining the actions taken.</p>					

Events and Speakers Approved
Dataset

a) Total number of events or speakers approved through the external speakers process	1172
b) Total number of events or speakers approved subject to any mitigations or conditions	40
c) Number of events or speakers approved subject to any mitigations or conditions due to Prevent-related risk	0

<i>Events and Speakers Rejected</i>					
Dataset	Health & Safety	Procedural Matters	Reasons related to Prevent risk	Other Matters	Total
d) Total number of events or speakers rejected	0	0	0	0	0
<i>For each case, please add information about the reasons for rejection where that rejection was for reasons related to Prevent risk. Maximum 300 words.</i>					
No external speakers were rejected during the year.					

Training	Number
a) Number of staff identified as key in relation to the Prevent Duty	435
b) Number of key staff receiving induction Prevent training	73
c) Number of key staff receiving refresher Prevent training	25
<i>Please add any further technical information in the free text box below which you believe would be helpful or relevant for OfS to know regarding Training. (max. 300 words)</i>	

Training of key staff operates on a 3-year cycle. New staff in those key groups are also invited along to the scheduled trainings each year.

435 roles are identified as key to the delivery of Prevent.

98 key staff members received face-to-face Safeguarding and Prevent training during 2023/24.

Of the 98 staff that attended face-to-face training, 73 received induction training and 25 received refresher training. Face to face Safeguarding and Prevent training was also delivered on request to 41 academic members of staff in the Faculty of Nursing, Midwifery & Palliative Care and to 13 members of staff of the KCL Student's Union Advice and Welfare Team.

An additional 193 key staff members completed the Safeguarding at King's e-module, which includes a chapter on the Prevent Duty.

Prevent annual accountability declaration

Throughout the year and up to the date of approval, **[Provider name]**:

- has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty)
- has provided to OfS all required information about its implementation of the Prevent duty
- has reported to OfS in a timely way all serious issues related to the Prevent duty, or now attaches to this document any reports that should have been made, with an explanation of why they were not submitted
- has reviewed, and where necessary, updated its Prevent risk assessment and action plan

Name	[Enter name]
Role	[Enter title]
Signed	[Paste electronic signature or sign here]
Date	[Enter date signed]

☐ I confirm that I have the authority to sign on behalf of the governing body, or proprietor where there is no governing body.

Declarations should be signed by the chair of the governing body or proprietor (where a governing body does not exist) or a person within the provider who has received delegated authority to sign such declarations on behalf of the governing body or the proprietor. This declaration would be treated as confirmation that the provider has had due regard to the Prevent duty.

Safeguarding Report 2023/24

1. Governance

- 1.1. The Safeguarding Steering Group oversees all Safeguarding activity, including the approval of updated policies and the annual review of the Safeguarding Risk Assessment and Action Plan. The Steering Group is chaired by the Vice President (Education and Student Success). In 2023/24, the Steering Group met in October and June. Currently the KCLSU President is a member of the Group. For 2024/25, two faculty members will be added to the membership. Due to no president role in the KCLSU sabbatical team in 2024/25, the KCLSU VP Welfare and Community will attend. A Deputy Chair will also be assigned to the group.
- 1.2. The Safeguarding Oversight Group provides operational support to the Safeguarding Steering Group and is co-chaired by the Associate Director (Academic Regulations, Quality and Standards) and the Associate Director (Advice, Wellbeing and Welfare). The Safeguarding Oversight Group met four times during the year. Engagement with the Safeguarding Oversight Group has been positive and has continued to develop over the year. Standing Items on key student areas include: Under 18s; Bullying, Harassment & Sexual Violence; Support for Study; and Student of Concern. All Lead Safeguarding Officers are members of the Oversight Group and the group's membership consists of representatives from across the College, including Residences, Security, Widening Participation, HR and International. The KCLSU VP Welfare and Community and a member of the KCLSU Advice team are members of the Oversight Group. As part of ongoing activity, the roles and responsibilities of DSOs is being reviewed to assess their respective areas, procedure updates and training needs.

2. Policy and Procedure Updates

- 2.1. The Safeguarding Policy is reviewed annually to ensure compliance with British Council requirements for King's International Foundation Programmes and to ensure alignment with any new or updated government legislation. In August 2023, the Safeguarding Policy underwent its annual review as per British Council accreditation guidelines, and the updated version of the policy was approved by both Safeguarding committees and University Executive and then subsequently uploaded to the Policy Hub in December 2023. Key areas of focus were:
 - Updates made to the Policy following the annual review as per British Council accreditation guidelines.
 - Including definitions of students and pupils to provide clarity around clauses.
 - Inclusion and reference to updated legislation on the Counter-terrorism and Border Security Act 2019 and Keeping Children Safe in Education 2023.
 - Reference to Report and Support tool to replace It Stops Here as this is no longer in use at King's.
 - Review of safeguarding students in relation to under 18s, outreach and widening participation and students with criminal record disclosures, to ensure these clauses were up to date.

- Providing clarity on staff undertaking regulated activities with children and adults at risk.
- Working with colleagues in Legal Counsel to review the Charity Commission Guidance on Reporting Serious Incidents, including contact with local authority to ensure this was accurate and up to date.
- Updating links to associated policies, procedures and external legislation.
- In June 2024 following discussion and approval at the Safeguarding Oversight Group, an auto-forwarding procedure was approved.

2.2. Other policy developments of note from 2023/24 include:

- The Suicide Safer Strategy, Student Trusted Contact Procedure and Residential Welfare Policy were reviewed throughout the year and updated versions uploaded to the Policy Hub.
- Procedure 1 of the Safeguarding Policy on Roles and Responsibilities was also reviewed and the updated version uploaded to the Policy Hub.
- The Staff and Students Relationships Policy was drafted this year, and the Education and Students Strategic Director continues to work with the Promotions and Policy Manager to redraft the Policy for further discussions in the next academic year.

2.3. Further information on key areas is detailed in the relevant sections below.

3. Students and Applicants

Under 18s

- 3.1. At the start of the academic year 2023/24, there were approximately 500 students under the age of 18 joining King's for their first year of study. By the end of the 2023/24 academic year, 41 remained under the age of 18 when entering their second year in 2024/25.
- 3.2. The remit of the Designated Safeguarding Officer (DSO) role includes supporting departmental colleagues in undertaking activity involving under 18s and adults at risk. A DSO Responsibilities and U18 Checklist document was recirculated to all DSOs in time to report to the Safeguarding Oversight Group in December 2023 and June 2024. This set out key aspects of the role and required activities. This included a mandatory individual risk assessment template for any student aged 16 or under, which the DSOs are required to complete. All DSOs were required to report on checklist completion and progress supporting their faculty's under 18 students. The Faculty Wellbeing and Welfare Advisors have been supporting activities relating to students under the age of 18, including arranging follow-up meetings after non-attendance. This year, feedback from DSOs included:
- Processes had mostly run smoothly to allow U18 students to transition into Higher Education.
 - One concern raised from residences that due to delays in receiving the Right to Study form, there is risk of not knowing how many rooms are needed to house u18 accommodation. As Admissions will be sending the Right to Study form earlier, this is intended to ease the issue.
 - Having a list of Personal Tutors who have completed Safeguarding training would be useful so that they can be assigned to students appropriately.

- 3.3. The Associate Director (Advice, Wellbeing and Welfare) has worked with the Dickson Poon School of Law and HR to run a pilot project to establish a procedure for ensuring that faculties are able to identify and DBS check Personal Tutors prior to the allocation of students under the age of 18 at the beginning of the academic year. This pilot has now come to an end and a procedure has been mapped out. The Law school reported back that the procedure went well, and Personal Tutors engaged positively with the process. This procedure will now be rolled out across all faculties with a view to all faculties having a pool of DBS checked Personal Tutors prior to the start of 2025/26 academic year.
- 3.4. An under 18s process map has also been under development in 2023/24. A gap in safeguarding oversight had been identified during the year with regards to the monitoring of the attendance and engagement of students under the age of 18 on their course. Currently, guidance asks for Personal Tutors to meet with their under 18 students once before the end of October of the first semester. This provision works well for those students who turn 18 soon after enrolment but is less helpful for those younger students. Further work will be undertaken considering how the University can monitor these student's attendance and engagement on their course to ensure that any potential safeguarding concerns are escalated at the first opportunity.

4. Designated Safeguarding Officers

- 4.1. At the time of the introduction of the DSO role in November 2019, it was communicated that DSO responsibilities should reside with a minimum of a grade 7 member of staff, unless agreement was sought from the then Associate Director (Advice and Welfare). However, additional responsibilities linked to related processes have been added to these roles and the key responsibilities have been delegated to more junior members of staff over the years, including new roles being created, such as, Student Support Managers. The Associate Director (Advice, Wellbeing and Welfare) has introduced a working group that has met three times over the year to support these individuals, discuss roles and responsibilities, training requirements, safeguarding concerns and cases, and reflective work practices. This will continue over the 24/25 academic year whilst revisions are made to the DSO responsibilities.
- 4.2. After consultation with an external Higher Education Safeguarding consultant, it has been suggested that the University takes some time to review the activities undertaken by the DSOs. This will help to ensure that the role is allocated to the appropriate grade of staff and that the institution has a clearer picture of what those responsibilities need to look like across each faculty. This consultation piece will be initiated by the Associate Director (Advice, Wellbeing and Welfare), in collaboration with Associate Directors (Education) (ADEs) and DSOs in faculties. The aim is to have this review completed by January 25.

5. Bullying, Harassment and Sexual Violence

- 5.1. In the 2023/24 academic year, there continued to be good use of the Report and Support tool. As of mid-August, King's had received 636 reports for the 23/24 academic year, significantly exceeding the 455 submitted in 22/23. The sustained number of increased reports per month suggests that knowledge of Report and Support has grown in our staff and student communities, and that they are increasingly confident to use it as a tool to access support. An action plan has also been developed. A communications campaign for Report and Support took place in November in Anti-Bullying week, targeting both staff and students, and was successful. HR have implemented new procedures whereby if 2 or more anonymous reports are made via Report + Support regarding a staff member, a meeting will be held with the staff member and their line manager and/or HR to discuss their conduct and provide support.
- 5.2. Due to the external landscape, an increased number of referrals relating to the Israel/Gaza conflict was recorded. Between October and November 2023, 60 referrals relating to this issue has been received. As a result, an incident group was set up with a process developed to consider freedom of expression and Prevent-related issues.
- 5.3. As part of the enrolment process, students are being asked to complete Consent Matters Training. For the academic year 23/24, 18,204 students have registered to take Consent Matters and 15,829 have completed all three modules. This will be mandatory for the 24/25 academic year for all students. Early intervention is key and initial student engagement and numbers for completion is positive. The Preventing and Addressing Harassment and Sexual Misconduct Oversight Group met four times over the year and updates brought to the Safeguarding Oversight Group to ensure consistency.
- 5.4. The Policy on Relationships between staff and students is in development with updates being brought to the Safeguarding Oversight Group for discussion and endorsement. It had been advised by members of the group to make a decision to either ban or strongly discourage, rather than waiting for the OfS to release the outcome of their consultation. A revised draft is in consultation with plans for implementation in 24/25.
- 5.5. The Preventing and Addressing Harassment and Sexual Misconduct Oversight Group will be focussing on addressing the OfS new condition of registration around harassment and sexual misconduct in the 24/25 academic year.

6. Student of Concern Procedure

- 6.1. The Student of Concern (SOC) Procedure is the established route for any welfare or mental health concern about a student. Following a review in 2023/24, a new SOC referral form was introduced. A new triage system has also been implemented which provides two pathways of support:
- Student Support pathway (working closely with Wellbeing) for students where there is no significant risk of harm.
 - Student of Concern pathway for students presenting with significant concerns around risk of harm.

- 6.2. This new process means that all referrals will be assessed for risk. All students will be contacted and offered support from the most appropriate team. The SOC team also held an in-person planning day with faculty Designated Safeguarding Officers in the summer, this was very successful in building a culture of collaboration and co-design. A follow-up planning day is due to take place in November 2024 and twice-yearly meetings will be implemented going forward.
- 6.3. A total of 2278 referrals were made through the Student of Concern Procedure in 2023/24.
- 6.4. In terms of the mental health referrals in 2023/24:
- There was a total of 1384 referrals relating to Mental Health, which was a 22.5% average increase in referrals in 23/24.
 - However, some months have been particularly challenging. For example, there has been a 73% increase in Mental Health referrals in April and a 71% increase in February.
 - 618 referrals (compared to 502 last year) were risk-related (i.e. self-harm, suicide risk including suicide attempts).
 - 766 referrals (compared to 607 last year) were related to general mental health difficulties
 - 78 suicide attempts were reported (compared to 73 last year).
- 6.5. In terms of welfare referrals in 2023/24:
- There was a total of 894 referrals, which was an 18.27% increase in referrals compared to 2022-23.
 - Whilst 894 referrals had a primary concern listed as welfare, the total number of referrals that required some welfare support was 1020. Consequently, the number of cases that welfare lead on or co-worked with the mental health (1020) demonstrates a 35% increase on previous year.
 - 404 referrals out of the 1020 referrals were for Prolonged Lack of Contact = 40%
 - SOC Welfare managed 1122 cases in total during the 2023/24 academic year. The Welfare team rolled over 112 cases from the previous year, indicating the complexity of cases that required prolonged oversight and support from the team.
 - Top 5 concerns related to:
 - Prolonged Lack of Contact
 - Losing accommodation
 - Victim of crime
 - Domestic abuse
 - Financial deprivation

7. Support for Study

- 7.1. The Support for Study process continues to operate as a 3-stage process:
- Stage One is Faculty led involving the personal tutor or other appropriate staff.
 - Stage Two is also Faculty led but involves the senior tutor and is an escalation point from Stage One.
 - Stage Three is supported by central services with Faculty representation.

- 7.2. An annual report on Support for Study Stage 3 cases in the 2023/24 academic year is included in Appendix 1.

8. Training

- 8.1. In the period 1 August 2022 to 31 July 2023, 154 members of staff received face to face training via Microsoft Teams on Safeguarding and Prevent. This included Residence Welfare Leads, KCLSU Advice and Welfare Team, Senior Tutors, Student Booking Team, Chaplaincy, Security, colleagues from the faculty of Nursing, Midwifery and Palliative Care, and the Money and Housing team. Positive feedback has been received for the sessions and helped to inform future sessions. The Head of Security also took part in external training held by the DfE on Incels, online platforms and gaming sessions.
- 8.2. The Training Dashboard continues to be updated, monitoring the training of key groups across the College. Key groups of staff integral to the student piece have been identified including Colleagues in Student Services, Residences, Security and Chaplaincy as well as Senior Tutors and SMT. Face-to-face training is delivered on a 3-year cycle.

E-module

- 8.3. In the period between 1 August 2022 to 31 July 2023, **326** staff members completed the Safeguarding at Kings e-module and passed the end of module assessment. Positive feedback on the e-module has been received.
- 8.4. An updated version of the Safeguarding at King's e-module has been developed. This received excellent feedback from senior colleagues and gained approval through the relevant governance route. It is now available on WorkRite, the University's e-training platform. This went live in July 2024 and a communications plan has been put together to promote engagement with the course. The new platform is expected to be more accessible for all staff as well as easier to monitor from a compliance perspective. A review of the roll out of the course will take place in 2024/25.

9. Widening Participation

- 9.1. In October 2023, 17 members of the Widening Participation department attended the CPD accredited course entitled 'Child Protection Awareness training for professionals' run by ECP, Education Child Protection. The [NSPCC Child Protection e-training](#) forms part of the staff induction process for all new members of staff in Widening Participation. Any Widening Participation staff running online events are required to complete the NSPCC [Keeping children safe online training](#). In the period 1 August 2022 and 31 July 2023, there were 4 new starters who completed the necessary induction training.
- 9.2. The Widening Participation department conduct safeguarding training annually for current students hired to work as student ambassadors as part of our ambassador scheme. Training

was delivered in November 2023 to all newly recruited student ambassadors. Project leads (Officers, Senior Officers and Managers) also run safeguarding refreshers for ambassadors as part of programme briefings and additional safeguarding training is delivered for ambassadors working on summer school programmes. The Widening Participation Department works with 2000-3000 young people every year, and it is anticipated that a few safeguarding issues may arise. Usually these are easily resolved during the interventions or soon after, and often turn out to be inconsequential. These are logged by the Widening Participation team regardless. In the period between 1 August 2022 and 31 July 2023, there were 14 incident report forms submitted in relation to safeguarding; all of which were actioned and resolved.

10. Visitors and Campus Safety

- 10.1. Safeguarding remains at the heart of the security team mission and their processes and procedures have been developed with this in mind. One of the main developments to affect the university during the reporting period, was the escalation of the Israel/Gaza conflict. A key outcome of this was the exponential increase in protest activity, which often attracted external parties to campuses. Whilst this was focused at Strand Campus, protest activity was also seen at Guy's campus. The team recognised that this exposed a potential increase in safeguarding risk, and took steps to try and ensure oversight of protest activity was maintained to provide a safe and secure environment for students to undertake this.
- 10.2. Between 13th May and 19th July 2024, a Palestinian Solidarity Protest encampment was established by students within Strand Campus. This was one of 35 protest encampments established at universities around the country. The Security team recognised that this exposed a range of welfare risks. Students sleeping in tents within the campus overnight, and the high likelihood of external parties being attracted to attend the encampment, presented vulnerabilities. To counter this, the security team implemented a range of measures. These included: establishing effective dialogue with those within the encampment to maintain awareness of those coming and going, to establish a link with security (should this be needed), and to provide reassurance; hourly security patrols of the encampment during the night; increase in perimeter security to prevent external parties entering the encampment. This included doubling security presence on the main entrance and deploying handheld KCL identity car readers, to ensure external parties were not present. Disciplinary action was taken against KCL students who facilitated unauthorised entry of external parties.
- 10.3. Separately to the protest/encampment issue, the team have invested in the continued professional development. This includes providing accredited 'Level 1 Higher Education First Responder' training to all security officers, aimed primarily at improving security awareness. This was supported by the provision of the Level 3 course to security supervisors. One of the aims of this is to improve overall security awareness, which will enhance safeguarding capability.
- 10.4. All members of Security staff also receive broader safeguarding and welfare training as part of their induction, and this includes information on the Student of Concern procedure. Security managers continue to deliver regular briefings on how to deal with student of concern (SOC)

referrals and staff members encouraged to always complete the SOC forms for incidents requiring one. The Head of Security is a member of the Safeguarding Oversight Group and also attended the DfE Safeguarding training as well as the Safeguarding at King's face to face session, along with members of the security team.

11. International

- 11.1. There were two safeguarding concerns raised during 2023/24. One was in relation to a research study and the other was in relation to a King's student on training at an external partner. The former issue was resolved via local safeguarding structures which enabled staff to appropriately support and respond to the safeguarding queries.¹ Following review, the latter case was considered an issue of professionalism (or lack thereof on the part of the student) rather than a safeguarding concern.
- 11.2. Training requirements have been updated with links to the Foreign, Commonwealth and Development Office (FCDO) recommended training courses: [OLCreate: Safeguarding in the International Aid Sector](#) | [OLCreate \(open.edu\)](#)
- 11.3. Procedure 4 (International Protocol) and the [KGHP Safeguarding Policy](#) remain in place to ensure safeguarding procedures are followed appropriately within this directorate. [The KGHP safeguarding page](#) sits alongside the protocol, detailing whistleblowing guidelines and a code of conduct which is signed by all staff and volunteers, and an incident report policy and form. However, an additional risk was highlighted around of lack of clarity around lines of responsibility and reporting structures for safeguarding incidents within King's Health Partnership, which will be considered in 2024/25.
- 11.4. The Vice-President (International, Engagement & Service) remains a member of the Safeguarding Steering Group membership. In 2022-23, Safeguarding was promoted to the King's Partnership committee, the committee that approves new international education and commercial partnerships, as a recommendation to review any likely risk during the approval process. However, Discussions are taking place in the International, Engagement and Service directorate to see if the governance structures around safeguarding with external partners (both UK and overseas) needs repositioning in light of internal changes at King's.

12. Staff/HR

- 12.1. There have been no safeguarding concerns or reports relating to staff during the 2023/24 academic year. Existing practices and policies remain unchanged.

¹ Whilst this issue has been resolved and safeguarding procedures were followed at the time, it has been decided by Research Assurance to report this incident to the FCDO for transparency purposes following latest guidance from UK Research and Innovation (UKRI).

October 2024

Appendix 1 – Support for Study Report 2023/24 (pp.12-15)

Appendix 1: Annual Report on Support for Study

This report reviews the Support for Study (SFS) Policy and includes details of the number of students who engaged with this process for the academic year 2024 at Stage Three.

1. Summary of Support for Study Activity September 2023 – July 2024

The Support for Study Team Main processes	Sept 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	March 2024	April 2024	May 2024	June 2024	July 2024
Case conferences	26	20	35	16	32	35	10	7	8	3	5
Stage 3 new referrals	8	9	14	1	19	15	7	9	11	5	15
Stage 3 Scheduled & took place	7	8	9	6	5	12	14	15	17	16	16
Stage 3 waiting list/existing	119	111	102	96	87	90	84	72	68	57	50

The data shows that the requests and need for case conferences have reduced significantly. Similarly, the waiting list has also reduced due to the team's capacity to facilitate more scheduled stage 3 meetings.

2. Activity January 2024 – July 2024

In January 2024

The Support for Study team is formed with designated co-heads, case managers, and senior coordinators.

Stage 3 backlog: over 90 students awaiting a stage 3 meeting.

In March 2024

The SFS team has recently introduced consultation drop-ins for SSWS staff

We have hired a Mental Health specialist to provide support and Mental Health advice.

Stage 3 Backlog status: 84 students awaiting a stage 3 meeting.

In June 2024

The SFS team is now able to maintain 4 panels a week

Introduction of Faculty drops in with SOC management team for faculty staff

The SFS team and SFS MH advisor assist with stage 2 supported upon faculty requests (on average 1-2 per week)

Introduction of a new referral form for faculties as a direct route for stage 3 meetings (April)

Stage 3 Backlog: 57 students awaiting a stage 3 meeting.

In the 2022/23 annual report it was reported that there were 126 case conferences in relation to Support for Study, this has heavily reduced from the previous year, due to improvements made to the sharing of information with the Faculty by the Student of Concern Management Group, which includes providing a summary report on a student case, as well as the new roles outlined above. Currently, this has reduced further with 97 case conferences reported in Jan-Apr 2024 and 34 case conferences from May – July.

This is due to the new developments of the Support for Study team, as mentioned above, alongside further clarification of the rationale of case conferences being convened only when there are urgent risks to the safety of a student, and the concern warrants discussion of potential interruption, or report of trusted contacts (emergency contacts).

3. New Processes

Case consultations – These are consultations that occur every Friday to discuss with Student Support & Wellbeing Services staff members about upcoming Stage 3 meetings.

These were designed as a way to collate information for Stage 3 cases without staff members having to attend every Stage 3 meeting. It was discussed that student services staff were oversubscribed regarding having to attend 4 meetings a week, and thus, these consultations allow for information to be obtained and utilised in the meetings without staff attendance in all Stage 3 meetings, and staff can be consulted, and information utilised in the stage 3 meetings.

Faculty drop-in—Faculty drop-ins are a new process similar to case consultations, but mainly for faculty staff who have queries relating to students and would like advice regarding safeguarding or support. Faculty drop-ins are also supported by the SOC management group staff in terms of panel members working alongside the support of the study team.

Pre/Post Stage 3 Meetings – These are meetings for students and trusted contacts following or prior to having a stage 3 meeting to discuss and ask any queries and further support if needed.

Outcomes - The support for the study team has also changed the styling of our outcome letters and invitation letters. We are also working on video correspondences for students and faculty staff to ensure that our processes and procedures are clearly outlined.

4. Review

The Support for Study team recently had a review meeting (workshop) with Faculty DSOs alongside SoC management group members to discuss policy, process, and procedures, This reviewing process will continue with working groups, and staff members from a number of colleagues from Student Services, Residences, Faculties (academic and professional services staff) and KCLSU Advice and student representatives, to review the policy and procedure, within these meetings the changes that have been made to the policy and procedure are as follows:

- Outcome letters are signed off by case managers or, in the event of interruption or withdrawal, the Director of Student Support & Wellbeing Services.
- Support for Study letter templates for students have been reviewed, and changes have been made under the oversight of the Disability, Inclusion & Support team and in accordance with the compassionate communication guide.

- Case conferences are convened when there is concern and discussion about urgently interrupting students due to incapacity and safety. Following the panel's decision, the Director of Student Support & Wellbeing Services and appeals will be consulted for approval for any interruption confirmations.
- All interruptions and withdrawals need approval/oversight from the Director of Student Support & Wellbeing Services.

5. Resourcing

The Support for the Study team currently consists of 2 Heads of Support for Study (1 permanent, 1 temporary until December 2024), 2 managers, 2 senior coordinators, and one mental health specialist (currently temporary until the end of December 2024).

These roles have supported the reduction of the backlog of students on the Stage 3 waiting list and has also ensured that each Stage 3 has a mental health specialist to advise and provide support on each meeting. Within the Support for Study team a mental health specialist is essential to add expertise and risk assess any mental health concerns and considerations.

6. Key Issues and Risks

1. Resourcing Reduction – We have now been informed that the Support for Study staff team will be reduced to one head of support for the study, one case manager, one senior coordinator, and one mental health specialist (temporary). This raises concerns about the capacity to continue to facilitate the frequency of stage 2 supported and stage 3 meetings and poses a risk of an influx of student cases yet to come within the new academic year. The Mental Health specialist role is a vital role within the SFS team. Previously the team were resourcing this expertise with CMHS who were previously needing to attend each stage 3 meeting. Losing this role could cause significant issues with the SFS process, as the team would need to rely on the already oversubscribed CMHS team and revert to previous waiting list time frames and backlog. This causes significant concerns with student status, health and welfare, and the team's ability to support the university with overall student progression.
2. Staff changes – In line with the above, we have now reduced in numbers and have staff members who have taken new roles within the Student Conduct and Appeals team, which will have an impact on the Support for Study team in terms of readjustments and reorganizing. There is also concern about temporary contracted staff members, and also planning for further changes and transitions within staffing. There will only be one head of support for study, one case manager, one senior coordinator, and one mental health specialist. This means that within the new academic year there will only be 2 or 3 stage 3 meetings facilitated weekly instead of 4. This means 8 - 12 stage 3's will take place a month instead of 16. This will, of course, have an impact on the number of referrals received and scheduled and will have an impact on the overall capacity of the team to meet departmental requests and even consider ad-hoc (emergency cases).

7. Training and Support

The Student Conduct and Appeals Associate Director provided clear guidance to the Support for Study team regarding the correct procedure and processes in August 2024.

Expectations for all staff regarding relevant tasks have been outlined. Further training for faculty staff will be conducted with the welfare team around specific safeguarding elements. Continued training is planned to update relevant colleagues on the policy changes and support the management of the Support for Study processes.

A further workshop is also planned, including relevant stakeholders from Faculty DSO staff, SOC management group, and SOC Mental health team to gather feedback on the process at all stages and clarify what is needed in terms of review and processes to support the study policy.

Student Conduct & Appeals

September 2024

Template developed by the UK Research Integrity Office with the research integrity concordat signatories group

Annual statement on research integrity: Academic year 23-24

Section 1: Key contact information

Question	Response
1A. Name of organisation	King's College London
1B. Type of organisation: higher education institution/industry/independent research performing organisation/other (please state)	Higher Education Institution
1C. Date statement approved by governing body (DD/MM/YY)	XX/XX/XX
1D. Web address of organisation's research integrity page (if applicable)	https://www.kcl.ac.uk/research/research-environment/rgei/research-integrity
1E. Named senior member of staff to oversee research integrity	Name: Stephen Large
	Email address: stephen.large@kcl.ac.uk
1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity	Name: Alex Miller Tate / Serena Mitchell
	Email address: alexander.miller_tate@kcl.ac.uk / serena.mitchell@kcl.ac.uk

Section 2: Promoting high standards of research integrity and positive research culture. Description of actions and activities undertaken

2A. Description of current systems and culture
Since 2019, King's College London has had a dedicated stand-alone function to ensure the maintenance of high standards of research integrity, and the promotion of good conduct in research as well as a positive research culture, the

latter of which has, since 2023, been the purview of a separate central research culture team. The Concordat to Support Research Integrity provides the framework for all activities of the Research Integrity Office (RIO), which adopts a four-pillar approach to achieve this, covering: policies and procedures; training; engagement; and research misconduct. Three Research Integrity Managers (RIMs) take responsibility for these elements, taking responsibility for researcher engagement within three faculties, with research misconduct investigations or more complex research conduct enquiries being divided equally following triage. The RIO also supports a 0.6 FTE Project Co-ordinator who works solely on the UKRN's Open Research Programme (ORP).

Additionally, a Research Integrity Officer took up post in November 2023 (on a temporary basis) to assist with various elements of the work undertaken by the RIO.

The Office manages and supports two staff networks: the Research Integrity Advisor network which provides all research staff at King's with a local point of contact to speak to for advice and guidance on good research practices; and the Research Integrity Champions network who are Vice-Deans (Research) or their nominated equivalents and hold responsibility for ensuring that a culture of good practice and research integrity is promoted and embedded within their faculties.

To ensure co-ordination between central and Faculty activities, the Research Integrity Champions meet on a regular basis with the Research Integrity Office at the Research Integrity Champion Forum and the Research Integrity Office meet with the Research Integrity Advisors on a termly basis

Policies and systems

We expect all King's research to be conducted in accordance with the UK Research Integrity Office's (UKRIO) Code of Practice for Research and this expectation is set out on our externally facing webpages, where research-active members of the university are also directed to adhere to the commitments for researchers under the Concordat. Assurances on proper and timely reporting to funding bodies of issues related to research integrity or bullying and harassment are provided by the Memorandum of Understanding existing between the RIO and HR and the Pre-Award Reporting Standard Operating Procedure. A framework is in place to support authorship dispute resolutions, where these are not appropriately handled under the research misconduct procedure. This now uniformly involves recommending the use of the CRediT taxonomy when writing authorship and

contributor statements, both as good practice for publishing research outputs and as a tool to help clarify and resolve disagreements among contributors.

King's has a formal procedure to investigate and resolve allegations of research misconduct ('the Procedure') to ensure that we manage fairly, robustly, and effectively any allegations of potential research misconduct. The Procedure aligns with the model version published by UKRIO.

Training

The RIO offers termly training on the fundamentals of research integrity to all research-active staff and students and all colleagues within research support related roles. This training is bookable via the King's training portal, SkillsForge. This interactive 90-minute session receives consistently positive feedback through evaluation. The team also delivers joint sessions with the Research Governance and Ethics teams where requested by Faculties. Typically these are requested for new cohorts of PGR students. The Research Governance and Ethics teams also deliver their own standalone or joint training sessions. More bespoke, discipline-specific training is offered by the RIO in collaboration with our local Research Integrity Advisors (see below for more information on this network). This offers more in-depth consideration of research issues through a discussion-based format using a range of relevant case studies and dilemmas.

Training on topics under the research integrity banner are also delivered by other central teams: Libraries & Collections, including on research data management and open research; the Centre for Research Staff Development, for example on building successful collaborations and managing research funds; and the Centre for Doctoral Studies, such as on writing grant applications and analysing qualitative data.

Communications and engagement

Effective engagement with faculties is facilitated through the Research Integrity Champion (RICh) and Research Integrity Advisor (RIAd) networks, designed to ensure that research integrity is embedded within our academic communities. These networks support more bespoke localised training efforts (as outlined above), provide the RIO with visible, local advocates for research integrity, and assist the RIO in understanding discipline-specific norms. Success of these networks is reflected by the inclusion of King's as a case study in the UKRIO

guidance on this model and is additionally evident in a range of ways, as outlined below:

- Inclusion of research integrity on faculty and departmental meeting agendas.
- Research integrity included in local induction processes for new starters.
- Internal faculty web presence, including in staff handbooks, PGR handbooks and online message boards.
- Discussion of research integrity in grant set-up meetings with Principal Investigators.
- Local promotion of research integrity events (online and in-person).
- Information on good practice shared in faculty and/or departmental newsletters.

The Libraries & Collections (L&C) team has a dedicated researcher focused web presence to provide information and advice on good open research practices and additionally communicates via various newsletters and by providing verbal updates at institutional, faculty and departmental meetings.

In addition to maintaining strong internal networks across King's, the RIO engages in the national and international conversation on research integrity through a range of mechanisms:

- Subscribers to UKRIO.
- Institutional members of UKRN and a contributing member of the ORP.
- Members of the Russell Group Research Integrity Forum (RGRIF); in October 2023 RIO co-organised a RGRIF meeting at University of Birmingham and co-presented a session on research misconduct with a representative from Cambridge University Press
- Co-lead of the London Research Integrity Consortium (LRIC); in January 2024 RIO co-organised a LRIC meeting to discuss recent challenges, research misconduct processes and to share best practice
- Contributors (via a poster presentation and broader attendance) to the World Conference on Research Integrity: in 2024 held in Athens, Greece.
- In the reporting period, the RIO contributed to several UK Committee on Research Integrity (UKCORI) workshops on indicators of research integrity, intended to eventually output a standardised metric for institutions to self-assess how advanced their research integrity initiatives and practices are.

Culture, development and leadership

The RICH and RIAd networks support the promotion of a positive research environment, with the research integrity advisor network in particular allowing for colleagues to lead and drive change within their local areas. The ability to self-nominate to this role means this opportunity is open to all. Individual faculties have a range of initiatives to address the areas of culture, development and leadership of their researchers.

The Faculty of Dental and Oral-Craniofacial Sciences have established a dedicated Research Staff Committee, which represents the interests of all research-active staff in the faculty, including postdocs, both junior and more experienced PIs, as well as technical and research support staff. They have spearheaded several important initiatives around improving the integrity and culture of research.

The Faculty of Life Sciences & Medicine are continuing to develop a community of advisors alongside the RIAds (including Confidential Advisors as initial points of contact for concerns of bullying and harassment) to enhance the entire faculty's research culture. Joint meetings have been held with individuals in all of these roles to ensure that the distinctness of the roles are clear, that they are able to work together where concerns overlap, and that they are able to effectively signpost to each other and other available resources where needed.

Monitoring and reporting

The department of Research Governance, Ethics and Integrity tracks training delivered across the university. This records the area receiving the training, the audience (staff or students), approximate numbers of attendees, and the subjects covered by the training. This enables us to identify gaps in our coverage, thereby allowing us to adopt a targeted approach in the future.

The RIO continues to monitor inquiries into research conduct which helps identify trends and problem areas within the University. The Office is also responsible for reporting allegations/findings of research misconduct or bullying & harassment to research funders, as required by the terms of their contracts with the College. The RIO liaises with HR for these purposes where needed, which is aided by the use of a standard proforma and the memorandum of understanding.

2B. Changes and developments during the period under review

During the period under review (1 September 2023 – 31 August 2024) awareness of research integrity at King's has continued to increase steadily, as shown by an increasing number of inquiries received by the RIO.

Initiatives, Policies & Guidance

The Procedure for Investigating and Resolving Allegations of Research Misconduct is currently under review, with the primary goals of making the user-facing document more accessible, and streamlining the process itself to prevent undue delays to resolution. This work is being led by the RIO with assistance from the Research Culture Team and part-time seconded support from Research Impact. Further input will be sought at a later stage from our network of RIAds and RICHs. The RIO has also been developing an institutional code of good research conduct to outline the responsibilities of researchers at King's and to act as a signposting document to relevant research policies.

The RIO has developed guidance for the responsible use of generative artificial intelligence in the conduct, writing-up and dissemination of research at King's. This guidance is available on the RIO internal webpages, includes an infographic for ease of reference, and will be updated at regular intervals according to advances in both the technology and norms regarding its use within the HE sector. This is a part of several broader initiatives to support King's faculty to make effective use of this novel technology in their projects should they wish to, while maintaining research excellence.

King's has continued to make a significant contribution to the UKRNs ORP, The Project-Coordinator has co-developed the programme evaluation framework, built internal networks, created new induction materials for new programme members and set up local processes to facilitate the initiation of the train-the-trainer workstream, The King's Dean for research culture led the training project for the duration of the reporting period which has released two tranches of train-the-trainer sessions for participating institutions. As part of the ORP the RIO has also been involved in the open research indicators project, co-leading a group of 9 institutions that are looking to develop tools for assessing the prevalence of the use of CRediT taxonomy in authorship statements. This work is scheduled to be completed at the end of 2024.

The central RC team have developed a Contribution and Authorship Policy to encourage the uptake of CRediT taxonomy with the aim of more effectively

recognising all contributions to research. The policy is due to be considered by the College Research Committee in September 2024.

The Research Governance team have established a Security Sensitive Research (SSR) Expert Advisory Panel to support and provide advice on security sensitive research applications prior to submission through the college ethics processes. The first meeting of the panel was held in February 2024 and the panel have contributed to the development of the SSR registration forms and SSR procedure. Our Clinical Governance team has continued to develop their sponsorship and amendment review guidance and supporting documentation for King's sole sponsored research requiring IRAS submission. The team have also improved internal review processes by introducing a validation step into their sponsorship reviews which from initial data is demonstrating improved timeframe efficiencies of <12%. In May 2024 the Governance team also finalised an International Studies Risk Assessment matrix and procedure which is now being piloted on all King's sole sponsored clinical studies involving overseas sites, and international clinical trials submitted through the College Ethics processes.

The Research Ethics team have published a new policy that sets out the principles, responsibilities and requirements for all research involving human subjects conducted under the auspices of King's College London and provides details of the ethical review process operated by the University. The team have also published guidance on their internal webpages around the use of deception and incomplete disclosures in research, incentives for research participants and guidance around the ethical considerations when using trials as a research method.

The Faculty of Arts & Humanities have led several initiatives to support staff engaged in research on potentially traumatic or emotionally demanding subject areas – this included a session in October 2023 led by the Co-Chairs of the UK/IE Community Interest Group "Protecting the Investigator in Traumatic Research Areas", and a support group for Ph.D students and ECRs undertaking this kind of work led by Dr. Zoe Norridge.

The Institute of Psychology, Psychiatry & Neuroscience has conducted and hosted a series of blog-style interviews with staff called "Research Culture Insights", which have discussed many topics under the research culture and integrity umbrella.

The RIO has continued contributing to an electronic laboratory notebooks project which has assessed a variety of options and vendors for the provision of institutional electronic laboratory notebooks. LabArchives was selected and is

currently being piloted before full institutional rollout in late 2024. Site-wide access to this software will allow for accurate documenting, retrieval, and timestamping of data, to improve research integrity.

Training

The RIO has developed three online training modules on the Articulate platform, covering a general introduction to research integrity, an overview of the research integrity environment at King's in particular, and an outline of the topic of research misconduct in the context of the King's Procedure. These are expected to be made available to researchers by the end of this calendar year, and will become mandatory for all new research staff and post-graduate researchers over the course of the next two academic years.

Similar to the RIO, the Research Ethics team have also set up a termly training session for staff and students that anyone can book onto through the institutional training portal.

In addition to the general training sessions described above, the RIO has also provided a few bespoke sessions on particular research integrity topics during the reporting period. These include:

- An overview and case-study based discussion session on research integrity and the use of generative artificial intelligence at the (part of King's Business School) research staff away day (June 2024).
- A brief overview of research integrity and the use of generative artificial intelligence at the FoDOCS Research Staff Away Day (July 2024).
- An overview of funder reporting requirements in research misconduct and B&H investigations for the Employee Relations team in HR (March 2024).
- A seminar with Prof Cary Moskowitz speaking on the topic of text recycling and self-plagiarism (October 2023)

The Institute of Psychology, Psychiatry and Neuroscience hosted two research integrity-related events in the reporting period. The first was an afternoon session in December 2023 co-organised by the RIO and the Faculty Research Integrity Advisors. This saw presentations from the RIO, the Dean of Research Culture, local researchers as well as representatives from Wellcome, UKRI and Cambridge University Press. During the summer, the Faculty also hosted an Open Research Summer School from 22-26/07 2024, (co-organised by the Research Innovation Committee and the RIOT Science Club) Topics covered at talks and roundtables included scholarly communication, questionable research practices, and open

research practices. There were also hands-on workshops covering topics in reproducibility, open data, and more.

The Faculty of Arts & Humanities ran a series of informal lunchtime sessions on a variety of topics falling under the area of good research practice (the “Research Development Programme”). Several of these sessions were supported directly by the RIO and other RGEI teams, while others had support from Libraries & Collections. This series was run twice over the course of the year.

The Faculty of Dental and Oral and Craniofacial Sciences organised two in-house refresher sessions on lab etiquette and safety (covering topics such as health & safety, good research/laboratory practices and laboratory research culture) after identifying the specific need via input from the Centre for Host Microbiome Interactions.

The Faculty of Life Sciences & Medicine have ensured that the RIO has a regular training slot in every set of new PGR inductions, making research integrity a core aspect of this package of materials that introduce the next generation of researchers to King’s.

A detailed package of export control training was rolled out in February 2024 as a pilot project for relevant King’s researchers and support staff. The training materials and the portal that delivered it was compiled by HEECA (The Higher Education Export Control Association) and made available to the entire UK HE sector. More than 90 institutions are actively engaged with this training. As the subject matter was likely to be relevant to only a relatively small number of academics and administrators the training was deemed by King’s to be non-mandatory, nevertheless more than 120 King’s staff members have now completed it. The King’s International Regulations Manager participated in a full day workshop to review feedback from participants across the UK and to draft improvements for the latest version. The International Regulations Manager also represented King’s at two high profile HEECA conferences at the Fraunhofer Institute in Munich in February 2024 and in Glasgow in June.

Developments

1FTE Head of Research Culture and 2 x 1FTE 24-month Research Culture Managers joined RGEI in Autumn 2023, focused their initial energies on the co-creation of the King’s Research Culture Vision and Delivery Plan, a document detailing the King’s specific definition of research culture growth and guiding target intervention at central and faculty levels. After publishing and disseminating this

plan, the team have focused on designing mechanisms for monitoring research culture locally and across the institution, on policy intervention in responsible research assessment and authorship, and on the consolidation of King's place in the national and international Research Culture space, culminating in the inaugural King's Research Culture Symposium in January 2025. The RIO is increasingly working in collaboration with the central Research Culture team, with fortnightly joint meetings, regular feedback on each other's ongoing projects, and the design and delivery of joint training sessions. This is aided by the current Head of Culture's interim appointment as Head of Culture & Integrity.

The Faculty of Arts & Humanities have appointed a Research Integrity Facilitator on a 0.6 FTE contract, who will (among other duties) act as a point of contact within the faculty for confidential advice and guidance on research integrity issues, and develop area-appropriate training, all in collaboration with the central RIO and local research integrity advisors where necessary. The RIO are in regular contact with the individual in-post to provide any required support.

The Faculty of Arts & Humanities also launched a research hub in Autumn of 2023, which is a one-stop shop signposting researchers to support and advice available to them in the areas of research integrity and culture. The goal is for the hub to eventually share toolkits and training materials to assist individual departments with their own awareness raising in ways that are specifically relevant to research in Arts & Humanities.

The Faculty of Social Science & Public Policy, and the Institute of Psychology Psychiatry & Neuroscience have appointed dedicated professional services managers (Research Culture Manager/Research Culture Support Manager, respectively) to lead in the area of research culture, who have been in post since February 2024, and who are leading on initiatives to promote a positive research environment within the faculties. They join a Research Culture Manager in post within the Faculty of Arts & Humanities.

The Faculty of Dental and Oral and Craniofacial Sciences' research staff committee have developed a template agreement document to be completed by all supervisors (of Ph.D and postdoctoral researchers) and supervisees within the Faculty, with the goal of standardising expectations around support and responsibilities on all sides in these critical supervisory relationships. This is in use within the Faculty, and others (including the IoPPN) are working on similar initiatives.

International Regulations is a growing area of work at King's and addresses practical and legal obligations arising from export control regulations, national security, sanctions and embargos, U.S. extraterritorial regulations and, recently, compliance with access and benefit sharing obligations arising from the Nagoya Protocol.

King's International Regulations policy was published late in Academic Year 2022/23 and was backed up by a programme of outreach to all faculty Vice Deans of Research and appropriate Research Committees during the course of the reporting period.

The International Regulations Manager also established a Trusted Research Committee with executive sponsorship from the **Vice President (Research & Innovation)** and **Senior Vice President (Operations)** and held its inaugural meeting in early July 2024. The Committee has been established at the encouragement of the UK government but will also address an increasing and very wide-ranging level of scrutiny from funders. We hope that this will provide an integrated, holistic, approach to matters such as process and procedure, ownership and accountability, staffing and resiliency, to name just a few.

2C. Reflections on progress and plans for future developments

This should include a reflection on the previous year's activity including a review of progress and impact of initiatives if known relating to activities referenced in the previous year's statement. Note any issues that have hindered progress, e.g. resourcing or other issues.

Review of progress and impact

In line with last year, the total number of inquiries and cases have risen although there was a slight decrease in formal cases which may indicate that staff and students are approaching RIO or RIADs at an earlier stage with issues. This, in turn, may facilitate informal resolution of these issues.

Plans for future development

- RIO will initiate pilot testing of the online training modules with the intention that these become mandatory for PGR students and new research staff in the first instance.
- RIO plans to finalise, publish and promote the institutional Code of Good Research Practice.
- The UKRN ORP will continue to rollout the train-the-trainer project and over the next reporting period, trainers will go on to deliver training at King's.
- The Research Ethics team have developed a training session for supervisors of students and staff conducting research that requires ethical approval and this is planned to be rolled out over the coming year.
- The Research Culture team will be supporting the King's Research Culture Symposium in January 2025.
- The Faculty of Dental and Oral and Craniofacial plans to roll out the lab safety & etiquette training sessions and promote the use of electronic laboratory notebooks across the Faculty.
- The Faculty of Nursing, Midwifery & Palliative Care is hosting an inclusive research and education practices project, which will get underway in the next academic year. This is looking at three workstreams: increasing the diversity of researchers in the Faculty; increasing the diversity of research participants; and increasing the diversity of patient and public engagement members.
- The Institute of Psychology, Psychiatry & Neuroscience plans to run an annual Faculty Research Integrity event as well as running an open research survey, to identify strategic training objectives, map the current familiarity with and practice of Open Research, and identify pockets of good practice.
- The Faculty for Social Science and Public Policy intend to host a workshop on ethics and integrity in research collaborations as well as a PGR research culture lunch to allow PGRs an opportunity to feedback views on local research culture and new workshops/training sessions they think are needed. They also intend to develop an ECR new starter pack which will highlight both research culture and research integrity and develop local authorship guidance.
- The Faculty for Arts & Humanities plans to set up a reflective practice group in January 2025 to be offered to researchers working in traumatic/sensitive areas externally facilitated by Youth Beyond Borders who have experience of running these sorts of session in schools. They also intend to include research integrity in PGR induction material and

Issues hindering progress

There has been a significant resourcing issue within the Research Integrity Office within the reporting period. For various reasons, including delays appointing a new RIM after a resignation and another RIM being seconded to another role, for most of the reporting period there have effectively only been two RIMs in post at any given time, rather than the intended three (though the effect of this has been mitigated to some degree by the appointment of the temporary Research Integrity Officer noted above).

Although the increase in informal case resolutions (noted above) is a positive indication, responding to and dealing with a high-volume of informal inquiries is still time consuming for the RIMs and takes away from time that could be spent on proactive initiatives, training and policy work.

2D. Case study on good practice (optional)

Please describe an anonymised brief, exemplar case study that can be shared as good practice with other organisations. A wide range of case studies are valuable, including small, local implementations. Case studies may also include the impact of implementations or lessons learned.

[Please insert response]

Section 3: Addressing research misconduct

3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct

King's College London is committed to conducting its business in a fair and transparent manner. As an institution, we are committed to creating an inclusive and respectful environment for all members of our community. We are a large and complex organisation, with many different stakeholders, and therefore many different routes for resolving varied concerns or complaints.

A simple way for students, staff, and visitors to report incidents of inappropriate behaviour and access support services is through the Report + Support portal. Our Bullying & Harassment Policy outlines the University's commitment to preventing and effectively addressing bullying and harassment, enabling a culture where all individuals are valued and supported to succeed.

The University has a formal Procedure to investigate and resolve allegations of research misconduct (the 'Procedure'). The Procedure should be reviewed every three years. The Procedure is currently under a thorough, systematic review as part of the 'revamp' described above.

The Procedure is to be carried out in accordance with the principles of fairness, confidentiality, integrity, prevention of detriment, and balance, and these are defined with Annex 1 of the Procedure. There are appropriate mechanisms and safeguards in place within the Procedure to ensure adherence to these principles and that the process is transparent and robust. Accompanying guidance for managing an appeal, to promote a robust and fair process, is made available in the event of an appeal.

King's makes every effort to meet its obligations to external bodies, including regulatory and professional bodies, regarding the initiation or completion of a formal investigation. To the knowledge of the Research Integrity Office, King's has met such obligations.

Any concerns, complaints, or allegations may also be made under the King's Whistleblowing Policy.

Creating a safe environment for concerns to be raised

The network of Research Integrity Advisors was developed to support informal liaison processes. Enquiries reported from various faculties suggests this approach

has been successful and that students and staff feel comfortable in approaching a trusted colleague. The Faculty of Arts & Humanities are building on this successful network by creating a dedicated PS Research Integrity Facilitator post within the faculty.

Processes (formal and informal) for reporting concerns about research conducted in King's name is communicated to our community of research-active staff and students through our 10 training sessions and is also visible on our webpages. The RIO provides assurance to researchers that they should feel safe to report poor research practices, either to us or at local level. The RIO encourages researchers to approach us or local contacts (ordinarily the Research Integrity Advisors) if they feel that they or others have failed to meet the expected standards of good research practice, so that we can offer appropriate advice on how to mitigate any risk, and then advise on the next steps should it be appropriate to report research misconduct.

Information about the Procedure is available on our Research Misconduct webpage, along with advice and support, to all staff, students, and individuals external to the university who wish to raise an issue about the conduct of research undertaken in King's name.

During an investigation, we may signpost to mental health support provided by King's to staff and students, where appropriate.

Lessons learned

The proportion of cases where one or more parties seek or mention legal representation/action have continued to slowly increase during the reporting period. This has, in turn, resulted in concerns from panel members regarding personal liability/risks for findings made and reports issued in the course of investigating, and in some cases made it difficult to confirm panel members. The RIO has worked with the KCL Legal team to provide prospective panel members with reassurances regarding these concerns.

Outcomes of cases and investigations continue to show that guidance on good authorship practices are needed, especially where there are significant seniority gaps between authors, or commercial/Intellectual Property implications. It is hoped that the Contribution and Authorship policy mentioned above, developed by the central RC team, will assist with this issue.

3B. Information on investigations of research misconduct that have been undertaken

This table reports on the number of **allegations decided on** during the academic year 23-24 (including those associated with investigations which completed during this period but started in a previous academic year). Information from ongoing investigations has not been submitted. The information below concerns the total number of allegations made and reviewed, which arise from six separate investigations under the *Procedure*, including one for which no allegation proceeded beyond the screening phase. For clarity, this statement reports the total number of allegations, not the total number of cases, as each case involves multiple allegations (in this reporting period, each closed case included an average of 4 allegations).

The Procedure includes a screening stage to determine whether an investigation needs to be completed into an allegation. Allegations subject to screening have been included in the first column but only those that proceeded past this stage, to initial investigations and/or full inquiries, have been included in the second column.

Type of allegation	Number of allegations			
	Number of allegations reported to the organisation	Number of formal investigations	Number upheld in part after formal investigation	Number upheld in full after formal investigation
Fabrication	1	1	0	0
Falsification	5	4	2	0
Plagiarism	6	6	0	0
Failure to meet legal, ethical and professional obligations	8	7	0	0
Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)	4	3	2	0
Improper dealing with allegations of misconduct				

Multiple areas of concern (when received in a single allegation)				
<i>Other*</i>				
Total:	24	21	4	0
*If you listed any allegations under the 'Other' category, please give a brief, high-level summary of their type here. Do not give any identifying or confidential information when responding.				
<i>[Please insert response if applicable]</i>				

KING'S COLLEGE LONDON
AUDIT, RISK AND COMPLIANCE COMMITTEE
DRAFT ANNUAL REPORT 2023-24

1. INTRODUCTION

- 1.1 This 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 2023-24 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, data management, arrangements for securing economy, efficiency and effectiveness (VfM) and arrangements for ensuring legislative and regulatory compliance.
- 1.2 This report is prepared for the Vice-Chancellor & President and Council of King's College London, as a good practice measure rather than from regulatory mandate. However, it will 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. Meetings have been held in person, with an option for members to join by video link, via Teams. Members have tended to attend in person, rather than use the video link option. The Committee held one pre-meeting briefing for members, focusing on a specific activity of the University. This was in March, when the ARCC meeting was held at the Crick Institute, and the pre-meeting including a guided visit to several of the King's placements at the Crick, led by the Assistant Research Director at the Institute.
- 2.2 Ms Yolande Young joined the Committee at the start of the 2023-24 year to replace Ms Sarah Wilkinson as the cyber security specialist on the Committee. Other than this, there were no other changes to membership this year.
- 2.3 The Chair continues to have regular meetings and discussions with the Deputy College Secretary & Chief Compliance Officer, who line-manages the Business Assurance function. During the year, the Chair of the ARCC has also had access to the Director of Risk Assurance, who manages the day-to-day audit and assurance work at the College. The independence of the Business Assurance function from University management is ensured through these on-going relationships.
- 2.4 The Chair has also had regular meetings with senior members of the Executive, most particularly the Vice-Chancellor & President, the Senior Vice President (Operations), the Senior Vice President (Academic) and the Vice-President (Finance). The Vice-Chancellor now only attends ARCC meetings when a particular need arises. He did not attend any meetings during the year under review. Management reports are provided by the Senior Vice-Presidents.
- 2.5 During the year, the Committee has continued to engage with members of senior management regarding specific risk themes and topics at each of the three meetings during the year. In this regard, the cyber security sub-group of ARCC has met twice during the year (October 2023 and May 2024).
- 2.6 Matters concerning internal controls, governance and arrangements to support data quality have principally been discussed with the ARCC through the reports of the Business Assurance function, and in discussions with senior managers who have presented to the Committee on particular areas of interest.
- 2.7 This year, a decision was taken for matters relating to Value for Money to be taken through the Finance Committee, as part of the commercial report, rather than through the ARCC. The identification of the ARCC as the committee responsible for value for money issues was a legacy from the period when this was mandated by HEFCE. In future, the ARCC will review the University's state of compliance with procurement requirements and obligations at its November meeting.

- 2.8 The Committee continues to receive a termly Compliance Report, which enables members to maintain a landscape view of compliance risk at the College. Annual reports are received on key issues, such as compliance with the Prevent Duty, the UUK Research Concordat and legislation relating to Health and Safety and Equality, Diversity and Inclusion.

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 the College Council. The improvement of processes for Enterprise Risk Management has been one of the main focuses of the ARCC in recent times. The Committee believes that the implementation of a Board Assurance Framework (BAF) in the 2024-25 year, in line with the recommendations of the Governance Review, will greatly enhance the scrutiny of risk management at the University, particularly in relation to the delivery of the strategic objectives at their 2026 milestone. The Chair of the ARCC has put a great deal of effort into creating the right environment into which to introduce the BAF.
- 3.2 The Committee remains engaged with the Director of Strategy, who has the responsibility for maintaining the Enterprise Risk Register and for overseeing the management of risk at the University. The focus of recent conversations between the Director of Strategy and the committee has been around the introduction of the BAF and how this will help strengthen the overall management of risk at the University. Unlike previous years, there has not been a meeting of the relevant staff from the Strategy and Planning team and the independent members of the ARCC outside of the usual schedule of committee meetings this year.
- 3.3 The Committee has remained focused on certain areas of concern during the year. Chief amongst these is the focus on the risk presented by cyber-crime. The ARCC receives regular updates on this area of work from the Senior Vice-President (Operations) and the Chief Information Officer through reports to the main committee and also briefing sessions with the ARCC cyber-security sub-group. This is the second year for the dedicated information security assurance role within the Business Assurance team, and their input into these meetings has brought an independent viewpoint and a significant degree of clarity to the discussion of cyber security at the meetings of sub-group and in conversations away from formal meetings. Ms Young, who is the lead member on cyber security matters, is in regular touch with the Assurance team through correspondence and informal discussion and a good working relationship is building, which in time will provide the University with even greater insight into this fast-changing risk area.
- 3.4 The Committee received a written update paper from the CIO in June 2024, and there was a deep dive of the area at the sub-group meeting which preceded the main ARCC meeting by two weeks. Ms Young noted at the June meeting that the central IT team had done a significant amount of work to provide robust protection for the University from cyber-attack. However, it was also noted that the environment around cyber security changes very quickly and there can be no room for complacency. Cyber security will remain a key focus for the ARCC in the 2024-25 academic year.
- 3.5 The Committee has also continued to focus on the delivery of projects and programmes at the University and is maintaining a close watch over the Student Success Transformation Programme (SSTP), which has had some significant delivery challenges. This programme was discussed at length at the March 2024 ARCC meeting in the context of the work of the Portfolio Office and the transitioning of the work of the SSTP from a dedicated Programme Director to the leadership of the Director of Portfolio. It was again discussed as part of a set up update presentations for previous risk discussions. At the end of the year in focus, members of ARCC continued to express their concern about the lack of an overall plan for the work, a declared objective or target operating model, a business case or governance arrangements for the work. It was acknowledged, though, that the Portfolio Office had a good track record of delivery and members looked forward to seeing some improvement in this area in the early months of the 2024-25 year.
- 3.6 As part of its ongoing review of specific risk topics, the Committee received presentations from senior members of the College's management team for discussion on the following key areas at its meetings during the year:

- **Student Success Transformation Programme (SSTP)**

In November 2023, the Committee received a report on the progress which had been made in the Student Success Transformation Programme. This presentation outlined the complexity and scale of the portfolio and the scale of organisational change which is required by such a programme. It was noted that this brought with it a high degree of uncertainty and, therefore, risk. At this stage of the life of the programme, there were a large number of risks identified, all with high impact and high probability scores. The Programme Director commented that the risks identified by the Programme team and presented to the ARCC all had clear mitigations set out and implementing these would be the starting point.

In March 2024, the SSTP was discussed again in the context of Project Management, as members learnt that responsibility for the programme was transferring from the specialist contracted team to the Portfolio Office. The discussion centred around members' discomfort that there was a lack of detail in the report provided to ARCC about the SSTP, and concerns that the report obscured some of the problems which the programme had run into.

The SSTP was discussed again at the June 2024 meeting of the ARCC, as part of a wider follow-up discussion on previous risk management presentations. This presentation by the Senior Vice-President (Operations) highlighted a number of areas where the University had been successful in implementing transformation programmes, whilst acknowledging that the SSTP was not amongst those and had suffered from some false starts. Management informed the Committee that the main reason for the false starts was the scale and complexity of the task, and particularly the need to maintain business as usual operations whilst the transformation was going on. This had not been fully appreciated at the start of the Programme. In addition, it was now believed that the balance in the trade-offs required by the programme had not been properly achieved in the first instance and this had caused some tensions between the delivery teams. Mitigations to support better delivery and to provide a governance framework were discussed with the ARCC. It was reported that much of the foundational work had been completed and a second phase was about to start which would focus on shoring up the systems used by the teams supporting student success. The Committee was told that this phase would require more resource, and a business case was being prepared to present to Council to that effect.

ARCC has been keeping this particular issue under close watch since the inception of the SSTP and has pressed Management on a number of issues relating to it. The Committee will continue to monitor the progress of the programme against its objectives and the business cases for its elemental projects on behalf of the Council.

- **The Research Strategy**

The Vice-President (Research) reported that Research at King's is currently in a very healthy state. However, by addressing the risks to research which had been identified through the implementation of proper mitigations and controls, it was hoped that research would be made even stronger. However, it was noted that a full risk assessment around research was made difficult by its devolved nature and the fact that so many different individuals had responsibility over different areas which all contribute to the whole enterprise.

A key risk to be managed is the performance of the University in the Research Excellence Framework (REF), which is a key determinant of the amount of central funding the University receives to support research. Keeping up with the requirements of the Framework is one risk, particularly in relation to research culture. Another significant risk is the amount of data that is needed for the assessment now, and the ability of the University to provide all that is required at the requisite quality level. Members learnt that there was some significant work to be done before the submission date to ensure that the right data was available at a suitable level of quality. The developing strategy for REF will likely concentrate on identifying five or six areas which the University wants to grow, and determining whether there are successful researchers in the sector who can be recruited to grow the area more quickly.

Other significant risks to the research endeavour were identified as the amount of time it takes to submit grant applications and, at the other end of the process, to close a project, and the relationship with research collaborators, particularly NHS partners, where much of the research work takes place in an estate which is below the standard expected by the University.

On the issue of cross-subsidisation for research, the Vice-President (Research) noted that there were different levels of subsidy required for different disciplines and different types of research. However, the common factor in deciding the level of cross-subsidy offered by the University, would now rest on how much impact the research is likely to make. For instance, if a subsidy will be used to improve research so that it attracts students or improves the undergraduate experience, then it is likely to be granted. Similarly, Research Groups who are looking to the University to fund an upgrade programme for their facilities, are now being asked to seek sponsorship from existing commercial partners first.

The Integrated Planning Process (IPP) allows the discussions about impact and financial sustainability to take place at faculty level. These conversations include discussion on the cross-subsidy and how, or whether, it is supported. The Vice-President (Research) leads the discussions at the IPP to ensure that the mechanisms are all joined up across the University.

- **Updates to previous discussions**

Members had noted that they received a number of risk presentations from senior managers but had not heard again how the issues discussed at the ARCC meetings had concluded. At the June 2024 meeting, updates were provided on a number of these discussions:

- **Fundraising and philanthropy**

The main activity of the Fundraising department over the last six months of the academic year had almost exclusively focussed on decoupling the relationship with the KHP Trust partners. This will be completed by July 2024. Redundancies have been avoided, barring one potential post. The strategy going forward will be to invest in growth and to focus on the return on investment. The basic fundraising objective will be set at raising £50m per year. Prospect portfolios will be refreshed, and software tools are being introduced which are expected to be more effective. The People Plan will be used to reduce turnover in fundraisers during the year.

- **Financial Sustainability**

The signals had changed since the last paper was presented to ARCC on this subject. The NHS-inspired project which had been attempted to find efficiencies had not worked and efforts now are being concentrated on producing a more mature pricing model for research and non-regulated tuition fees. At the suggestion of Finance Committee, a range of scenarios have now been stress tested to understand the impact on the overall budget, following the income shock which had been felt in the current year. This has given confidence that the same level of shock could be withstood but has also pinpointed where action can be taken if that shock is felt again. The Integrated Planning Process has allowed this to be undertaken. More focus has been put into financially supporting academic growth, whilst restricting the attendant professional service costs.

- **The People Strategy**

The Staff & Culture Strategy Committee had been created since the last paper on the “Staff Strategy” had been presented to ARCC. This was established in March 2023, with the aim to provide ‘oversight of the people and culture strategy approved by Council, monitoring progress on achieving agreed objectives delegated to the executive for implementation and providing advice and guidance to the senior executive as required’. The committee is chaired by Council and ARCC member, Lan Tu, with representation from Council, KCLSU, and the wider staff community. The committee has sought to understand the landscape and challenges faced by King’s diverse staff community. Agenda items, during three meetings to date, have included discussions relating to the Staff Survey 2023, Student Success Transformation Programme, and outcomes of trade union discussions concerning pay and benefits. The committee has heard from a range of staff members through

moderated panel discussions. Members have discussed key issues and risks in relation to people, and made recommendations on managing them through, for example, advice on the staff survey delivery process and agreed communication points for members to share.

It was noted that the Staff & Culture Strategy Committee would continue to make recommendations to Council on strategy, College Ordinances and regulations related to staff and to advise the Senior Executive on related policy and programmes.

- **International and Geo-Political Risks**

This paper updated members on three main areas of progress since it was last discussed at ARCC. There were, the College Partnerships Committee, its governance review and the broad area of monitoring for, and dealing with, geopolitical risk. The committee noted the establishment of the Partnerships Committee since its last discussion on this topic. The forum is intended to promote consistency on decisions about partnership engagement and how their risk is (ethical, commercial and reputational) is treated. The Committee is co-chaired by the VP (International) and the SVP (Health) and is accountable to the University Executive. Duties of the Partnerships Committee include, to act as custodians of King's values, reputation, and future sustainability, providing advice and guidance to assess the quality of partnerships, such that the university maintains excellence. To assess the ethical standards within partnerships, such that the university delivers with integrity, its strategic vision. To identify and assess risks, both direct and indirect, of establishing and operating across a range of partnerships. Currently, the governance for this committee is being reviewed internally, with a report expected in Autumn 2024.

Members also noted the adoption by the University of values-based impartiality as a principle which will guide its response to complex geopolitical and social emergencies. This was approved in March 2024 by the University Executive, after discussions with Academic Board, One King's Leadership Team and the College Council.

- **Management of Reputational Risks**

The Executive Director of Strategic Communications reported that the resources, processes, and protocols discussed in the previous report to ARCC in June 2022 remain in place and continue to function well. It was noted that the University benefits from an integrated approach to risk and reputational management that captures reputational risk as part of any discussion on actions and issues, regular discussion at senior team meetings and an understanding of how risk and reputation intersect, a strong community of communicators throughout the University which can mitigate key reputational risks and a sophisticated approach to media monitoring, which supports a good understanding of sentiment.

Additional resources and initiatives have also been put in place. This includes the establishment of a communications leadership team, a dedicated resource in the media team focusing on issues management, regular collaboration with the Information Compliance team on Freedom of Information requests, and active engagement with the Russell Group and UUK.

- **Risks to the Delivery Plan for Strategy 2026**

Members noted that the University continued to manage risks to delivering Strategy 2026 through its Enterprise Risk Management (ERM) policy and procedure. Risks are reviewed with the University Executive and reported through an updated Enterprise Risk Register on a quarterly basis. As part of this review, risk owners are expected to update assessment of risk likelihood and severity and specify relevant mitigations. Although different from the Enterprise Risk Management procedure, the current development of a Board Assurance Framework will provide additional assurance to Council on the delivery of the University's Strategic plan, and the ERM policy and procedure will be reviewed in light of this once it is fully developed.

Particular areas of focus, coming out of the Integrated Planning Process, were the risks around meeting targets for international student growth, quality and diversity and the lack

of a substantive action responding to climate change challenges. Both of these risk areas are currently under review by the Executive.

- **Freedom of Expression**

The College Secretary noted that a number of steps were still to be taken to achieve full compliance with the new freedom of speech legislation and any associated OfS regulations. This included the development of a code of practice, a revision of the joint statement with KCLSU, a review of policies and processes, drafting required statements and identifying appropriate placement for them, staff training, and providing assistance to KCLSU to ensure alignment of their policies and procedures with those of the University.

- **Operational Risk Management**

The Director of Business Resilience reported that work continued on improving the quality and specificity of risk identification for both Faculty and Directorates. Improvements have been made to the risk register format to allow for better and more consistent categorisation of risks, which has improved the reporting and consideration of risk horizontally across operations. The university has started to introduce the concept of risk appetite at operational risk levels starting with discussions on tolerance of risks post mitigation. Whilst Faculty and Directorate risks are still collated separately using slightly different processes, the next step will be to bring both into the same format to reduce the additional work to bring information into the dashboard. The university launched a Risk Management staff network at the beginning of this year to offer opportunities to staff who cover risk in their roles to come together and share knowledge and experience.

Operational risks are regularly reported on in quarterly meetings with particular focus in the Directorate meetings on the efficacy of mitigations and controls, understanding and working within risk appetite and consideration of related opportunities. Key operational risks as shared with the Enterprise Risk Team where the impact from a risk is likely to have significant impact on the core operations, financial standing or reputation of the university. This needs further refinement and clarity following the finalisation of the BAF.

- 3.7 The opportunity to directly question risk owners about their chief challenges and, particularly, about their risk mitigation strategies continues to be greatly valued by members of the ARCC as a way of assessing the College's overall quality of approach to risk management.

4. INTERNAL ASSURANCE PROGRAMME

- 4.1 The internal assurance programme for the 2023-24 academic year was set by the Committee at its November 2023 meeting, and was successfully delivered by the Risk Assurance team. During the year there were two team members and one vacancy (Jan-Sept 2024). From 2024-25, the Head of Compliance joined the Risk Assurance team and the vacancy was filled.
- 4.2 During the year, 34 internal assurance reviews were completed. This included seven reviews which were undertaken as part of the Compliance Assurance Programme and two which were part of the project assurance programme.
- 4.3 All Business Assurance review outputs were reported to the ARCC during the year at its termly meetings, with a summary of the findings being reported to the governing body through the Chair of ARCC's regular report to Council. A summary of the reviews presented through the year is contained in the Annual Report of the Business Assurance Department for the 2023-24 year (ARCC1123N).
- 4.4 The Business Assurance team continue to create a regular report for the Vice Chancellor's Management Meeting (VMM) on all audit recommendations which are not fully implemented within their target dates. Each recommendation has a senior sponsor so that there is accountability at the highest level. There is willingness at the senior team level to close the loop on these recommendations, but their closure often depends on a number of external factors.

5. EXTERNAL AUDIT

- 5.1 Summary of costs of KPMG work at the university to follow.

6. COMPLIANCE

- 6.1 A programme of Compliance Assurance Reviews was carried out by the Business Assurance Department during the year and a termly Compliance Report was presented to the ARCC at its November 2023 and March 2024 meetings. This report included an assurance map for the management of compliance risk, which is created in close collaboration with management and is updated each term. The report and assurance map, when taken together, presents a rounded view of the compliance landscape from both a management viewpoint, and from an independent assessment presented by the review programme. During the year, Medical and Healthcare Regulations Authority (MHRA) requirements for manufacturing and production of medical devices and drugs were added to the map, as was compliance with the Representation of the People Act and its relevant OfS advice note. A limited amount of horizon scanning is possible, and the Committee are aware of a number of emerging areas. Currently on the watch list for the Committee are the Foreign Interference reporting duty which is included in the National Security Bill progressing through Parliament and the Protect Duty (also known as Martyn's Law) which is also making its way through a consultation period. The Committee is still awaiting likely developments around requirements for the College to report on its activities relating to environmental sustainability and will monitor compliance to any compulsory obligation to report.
- 6.2 The risk assessment which accompanies the report provides the Committee with a high-level view of the movement in risk in these areas and provides a good barometer of how legal and regulatory compliance is managed across the College.
- 6.2 The Committee paid particular interest to the updates provided by management on the progress of the Health & Safety Executive's (HSE) investigation into a case of occupationally acquired asthma at the College. This matter was eventually settled with the HSE through the College's successful implementation of a detailed action plan. Several other compliance-related internal reports were presented to the Committee during the year. These included:
- The Public Sector Equality Duty
 - Compliance with the OfS Conditions of Registration
 - Prevent Duty
 - National Security Legislation
 - Student Visas
 - UUK Accommodation Code of Practice
 - Rights requests under GDPR and FoI
 - Charity Governance Requirements for Exempt Charities
 - MHRA Good Manufacturing Practice (GMP) Standards
- 6.3 During the year, five Suspicious Activity Reports (SARs) were made to the National Crime Agency (NCA) by the then Deputy College Secretary, who acted as the Money Laundering Reporting Officer for the College. These all included a request for a Defence Against Money Laundering (DAML) offences to be provided by the NCA, so that the College could return the funds to the card company or for funds to be moved to a charitable account within the College. This was the same number of submissions as the previous year.
- 6.4 Eleven reports of fraud were made to the College during the year, either from emails to the Counter Fraud mailbox or directly to a College department. One related to a payment diversion scam where a creditor to the College had been convinced to pay a fraudulent bank account after receiving a fake payment demand. Several of the other calls related to a scam operated nationally in several universities where students were approached by fraudsters claiming to be senior

members of the University Finance department. In these cases, the students were told their bank accounts had been compromised and they were advised to move money to a “safe” account which had been opened for them. Fortunately, only a small number of students followed the instruction. King’s was not impacted by any of the frauds directly and extensive investigations by the Cyber Security team established that University employees were unlikely to have been involved. Wherever possible, the University attempted to help the impacted party to the best of its ability. In the instance of the defrauded creditor, this included assistance from the Cyber Security team. For its defrauded students, Student Services provided assistance, and a comprehensive information campaign (despite it being exam time) was undertaken.

- 6.5 Two Public Interest Disclosures (Whistleblowing) were made during the year. Both cases were referred to the grievance process. Several complaints were received in the Whistleblowing inbox, however, these did not satisfy the criteria to be considered as Public Interest Disclosures. There has been a noticeable decline in the number of staff wishing to access the Whistleblowing process since the introduction of the *Report + Support* system, which manages allegations of bullying and harassment.
- 6.6 The Chair of the ARCC has related the key points of these reports to the College Council for its consideration in his regular reports during the year. No serious adverse matters were reported to Council, with the single exception of the HSE investigation into a case of occupationally acquired asthma mentioned above.
- 6.7 Overall, the compliance landscape was considered to be well managed, despite challenges from regulatory change and an increased number of obligations on the College, particularly those which impact the way in which it works with overseas partners and collaborators. The Committee also notes that one area where an assessment of high risk has been accepted is data protection. This is because human nature will always play a key role, and so it is impossible to completely mitigate against the actions of an individual, whether malicious or benign, causing a data breach. Therefore, a high probability rating has been accepted by the College, although it continues to develop and implement policy and training to ensure that the impact of any breach is moderate.

7. CONCLUSIONS

- 7.1 The Audit, Risk and Compliance Committee is 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 assurance reports as well as reports concerned with purchasing and compliance, and presentations on 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 governance and integrity
- 7.2 To assist the Audit, Risk and Compliance Committee in coming to this conclusion, the Business Assurance Department has given an opinion on the whole framework of internal control, based on its work 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 considered generally adequate and effective and 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 2024.
- 7.4 Members of the Committee also noted 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.
- 7.5 Internal assurance reports have referenced value for money matters consistently, as well as a small number of reviews which were designed specifically to test this area of work. In addition, the ARCC has had the opportunity to discuss with the Chief Procurement Officer how the College is approaching the development and execution of its strategy with regards to value for money.
- 7.6 The Committee engaged directly with Management during the year 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 Committee noted that management are committed to managing risk effectively and are currently content that the College is engaged in an appropriate improvement programme to support 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 2023-24.
- 7.8 Based on the Audit, Risk and Compliance Committee's review of internal assurance reports, risk management arrangements, the external auditors' findings, and the Management 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 were both adequate and effective.
 - The processes by which the university manages its key risks is improving and maturing.
- 7.9 The ARCC has paid particular attention this year to cyber security and to the initial stages of implementation by management of an enhanced risk management framework. The Committee is pleased with the continuing programme of work being conducted by executive management on cyber and broader computer security across the College. The management of IT risk has continued to improve and there is good early planning to continue this progress by management with high aspirations. The relationship between the ARCC cyber subgroup and executive management seems to the Committee to be productive and appropriate.
- 7.10 Members of the ARCC continue to support the view that the whole governance of assurance at King's College London would be greatly improved and strengthened by the introduction of a Board Assurance Framework (BAF). A BAF would introduce a methodology by which members of Council could take a view on the accuracy of the assertions of the executive about its management of the key strands and pillars of the College's strategic goals. As such, it would be a key tool in the developing risk management capability of the College, and the framework will ensure that management of the key risks is being scrutinised in the right places and by governors with appropriate expertise. A properly implemented BAF would also support the identification of any gaps in the arrangements to achieve the strategic goals and would help management to close them before they threaten the achievement of those goals. For the executive, a BAF can also be used as a management tool to prioritise activity and to allocate resource appropriately. Following on from the governance review, the ARCC is pleased to note that support for the development of a BAF is coming from other committees and senior members of the Council.

Mr Paul Cartwright

Chair – Audit, Risk and Compliance Committee

King's College London

November 2024

King's College Council

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Report of the Staff & Culture Strategy Committee (SCSC)

Contents	Meeting at which considered	Consent agenda	Council action
1. HR Strategy - Thriving Staff Community	23 October 2024	Yes	Note
2. Committee Membership and remit	23 October 2024	Yes	Note

To Note

1. HR Strategy - Thriving Staff Community

The Committee received an update on the development of the first King's College London HR Strategy from both the outgoing and incoming Vice President (People & Talent) (**Annex 1**). The Committee discussed the five Pillars of the HR Strategy 2024-2027 and the HR priorities for 2024-2025. It provided feedback that the plans are ambitious, and would require robust prioritisation, and encouraged more prominence within the HR Strategy for technology, which is critical for efficient HR service and support. There was a discussion around technology as an HR enabler versus an institution wide ambition.

The HR priorities for 2024-2025 for building a thriving staff community are underpinned by two key strategic performance indicators that HR would monitor and track:

- To continue the implementation of career development opportunities for staff.
- To progress the work on a positive and inclusive culture.

The Committee agreed that the five pillars of the HR Strategy 2024-2027 were the right priorities, and were assured that EDI and culture ran through each of the five pillars:

- Learning & Development
- Behaviour & Culture
- Resourcing
- Reward & Recognition ad
- Engagement

The HR Strategy is in development and has been informed by conversations with faculty and directorate heads. The next phase is consultation with the Vice Deans, before sharing with the broader HR team to provide a sense of purpose and focus and rolling out. The ambition is to have consistency across the University.

A key HR focus for next year is developing recruitment processes, reducing agency spend, and reducing spending by changing processes and systems. The Committee was assured that HR's priorities are within budget, and that nothing will take additional investment with the exception of the level of ambition regarding reducing agency spend.

2. Committee Membership

The Committee noted that future consideration of its terms of reference and agendas should reflect the Board Assurance Framework, and address both the strategic people and risk areas to provide greater assurance to Council on its oversight of the people and culture strategy.

The Committee discussed its membership, experience, and representation. The original intent was to have more colleagues working in Professional Services and Academia. There was currently only one academic from King's sitting on the Committee. It was requested that the Committee membership be addressed by the February 2025 meeting.

Donna Catley
November 2024