King's College Council

Meeting date	22 November 2022
Paper reference	KCC-22-11-22-02
Status	Final

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)

- The Queen's Commonwealth Trust (Chairman)
- The Nuffield Trust for the Forces of the Crown (Trustee)
- Schroders plc (Chairman, International Relations and Corporate Responsibility)
- Ceased on 8 April 2021 - BAE Systems plc (Member, International Advisory Board)
- Ceased on 31 August 2021 - Theia Group Inc (UK Adviser)
- House of Lords (Crossbench Member)
- Resigned 15 June 2022 - The Independent Adviser on Ministers' Interests#
- President of the Royal Overseas League
- Investments in various Schroders funds held by the College

Vivek Ahuja

- Chief Executive Officer, Terra Firma Capital Partners Limited
- Non-Executive Director, NatWest Markets plc.
- Fellow member of the Institute of Chartered Accountants in England & Wales (ICAEW)

Natasha Awais-Dean

- Research Integrity Manager; Visiting Research Fellow (History) KCL
- Trustee, Society of Jewellery Historians
- Team Manager, Berkhamsted Swim Club (voluntary, pending)
- Member of the Society of Jewellery Historians
- Member of the Society of Renaissance Studies

Hillary Briffa

- Lecturer in National Security Studies in the Department of War Studies
- Circle U Chair – Climate Hub
- Member of the School of Security Studies Equality, Diversity and Inclusion Sub-Committee
- Member of the SSPP Faculty EDI in Research Working Group
- Member of the College level Working Group on Interdisciplinarity in CPD & Executive Education
- Member of the SSPP Assessment and Feedback Task and Finish Group
- Vice-Chair of the governing board of Godwin Junior School (10 June 2019 – 9 June 2023)
- Vice-Chair of the governing board of Carpenters Primary School (18 September 2019 – 18 September 2023)
- Registered as self-employed – private rental
- Member of University College Union

Paul Cartwright

- Chaplaincy Volunteer at West Hertfordshire Teaching Hospitals NHS Trust from 1 July 2022
- Fellow of The Institute of Chartered Accountants in England and Wales (IcAEW)
- Trustee of Raise, West Hertfordshire Hospitals NHS Trust Charity 1052210 (ended 31 May 2022)
- Non-Executive Director of West Hertfordshire Hospitals NHS Trust (ended 31 May 2022)

Donna Catley

- Paid employee of Compass Group; Company Director, Compass Group UK&I

Note: College has a small investment with Compass Group through a managed fund.

Jon Coles
- United Learning Trust
- Learning Partners Academy Trust
- The Prince's Teaching Institute (resigned 16/4/21)
- Challenge Partners (was Chair until September 21)
- Chief Executive, United Learning (group of schools from which some students will progress to KCL)

Michael D'Souza
- Bank of England (part-time)
- Independent member of Bank of England's RTGS/CHAPS Board of Directors and Chair of its Risk Committee
- Member of the Bank of England's Court of Directors' RTGS Renewal Committee
- Independent senior advisor at the Bank of England's Prudential Regulation Authority
- Chair of the Regulatory Arbitrage and Market Consequences Committee
- Independent Member of the Bank of England's Resolvability Assessment Framework Steering committee

Paul Goswell
- Trustee of the Somerset House Trust
- CEO of Delancey Real Estate Asset Management
- CAPE PROJECTS LIMITED; CORTX HOLDINGS LIMITED; CROYDON PLAZA LIMITED; DCIF UK GENERAL PARTNER LIMITED; DELANCEY ASSET MANAGEMENT LIMITED; DELANCEY COINVESTMENT LIMITED; DELANCEY INVESTMENT ADVISORY SERVICES LIMITED; DELANCEY NW1 CO-INVESTMENTS LTD; DELANCEY NW1 GROUP LTD; DELANCEY NW1 PROMOTE LTD; DELANCEY PARTNERS CO. LIMITED; DELANCEY REAL ESTATE ASSET MANAGEMENT GROUP LIMITED; DELANCEY REAL ESTATE ASSET MANAGEMENT LIMITED; DELANCEY REAL ESTATE DEBT SERVICES LIMITED; DELANCEY REAL ESTATE INVESTMENT MANAGEMENT LIMITED; DELANCEY REAL ESTATE PARTNERS LIMITED; DELANCEY REAL ESTATE PARTNERS LIMITED; DQR CAPITAL LIMITED; DREAM NW1 CO-INVEST SPV LIMITED; DREAM NW1 GP SPV LIMITED; DV4 ADMINISTRATION 1 UK LIMITED; FIVE OAKS INVESTMENTS LIMITED; HEADLAND INVESTMENTS LIMITED; HERE EAST MANAGEMENT LIMITED; INNOVATION CITY (LONDON) LIMITED; JUPITER PROPERTIES 2011 UK LIMITED; MINERVA (CROYDON) LIMITED; MINERVA (FINANCE) LIMITED; MINERVA (KENSINGTON DEVELOPMENTS) LIMITED; MINERVA (STORES) LIMITED; MINERVA CORPORATION LIMITED; MINERVA LIMITED; MOUNT KENDAL LIMITED; MOUNT KENDALL GROUP LIMITED; NEWINCCO 1404 LIMITED; NEWINCCO 1407 LIMITED; NW1 PARTNERS (GP) LTD; NW1 SPANISH LOGISTICS (UK) HOLDCO LTD;
- PENNISULA PROJECTS LIMITED; PENNINSULA PROJECTS (ELLANDS) LIMITED;
- SOMERSET HOUSE TRUST.
- Member of the RICS

Vinay Jha

- Full-time employment as 'Chief Innovation and Digital Officer' at M&G Plc.

Shitij Kapur
- President & Principal, KCL
- Non Executive Director, Russell Group of Universities
- Member, Advisory Board of the Medical Research Future Fund, Australia
- Member, International Advisory Council, SusTech University, Shenzen, China

- Member, Royal College of Physicians
- Member, Academy of Medical Sciences
- Member, British Society for Human Genetics
- Member, Association of Physicians of Great Britain
- Member, American Society of Human Genetics
- Owner, Apartment 10, Victor Wharf, Clink Street, London, SE1 8DW

Lan Tu

- CEO of Virgin Money Investments, a joint venture between Virgin Money plc and Abrdn plc (ended Aug 2021)
- Self employed consultant
- Advisor to Mental Health at Work CIC
- NED: Arrow Global Group lc (end oct 2021)
- NED: Shawbrook Group plc,
- NED: Shawbrook Bank Ltd
- NED: WNS Holdings Ltd
- Director: Lonsdale Road (Barnes) Management company Ltd
- Director: Virgin Money Unit Trust Mangers Ltd (end May 2021)
- Director, Lonsdale Road (Barnes) Management Company Ltd

King's College Council	
Meeting date	22 November 2022
Paper reference	KCC-22-11-22-03
Status	Final
Access	Members and senior executives

Meeting of the King's College Council to be held on **22 November 2022 at 17:00 in the Council Room, King's Building, Strand Campus.**

Agenda

1	**Welcome, apologies and notices**		Chair
2	**Declarations of interests** (to note)	KCC-22-11-22-02	Chair
3	**Approval of agenda**	KCC-22-11-22-03	Chair
4	**Unanimous Consent Agenda**, including:	KCC-22-11-22-04	Chair
	4.1 Minutes of the Previous Meeting	KCC-22-11-22-04.1	
	4.2 Council Rolling Calendar of Business Items from Committee Reports	KCC-22-11-22-04.2	
5	**Matters Arising**		
	5.1 Revisions to Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College London and Process for Rescinding of Honours (to approve)	KCC-22-11-22-05.1	College Secretary
	5.2 Actions Log	KCC-22-11-22-05.2	Chair
	5.3 Student Success Transformation Programme (tentative – to approve)	Paper to follow	VP (Education)/SVP (Operations)
6	**Report of the Chair**		Chair
17:10	6.1 Minor Ordinance amendments and process amendment (to approve)	KCC-22-11-22-06.1	
	6.2 Any other items	Verbal	
7	**Report of the President & Principal**		
17:15	7.1 Summary Report on Key Issues (to note)	KCC-22-11-22-07.1	Principal
	7.2 BRC update	KCC-22-11-22-07.2	SVP (Health & Life Sciences)
	7.3 Update on TEF Process & New Criteria	KCC-22-11-22-07.3	VP (Education)/SVP (Academic)
8	**Report of the KCLSU** (to note)	KCC-22-11-22-08	KCLSU President
17:35			
9	**Reports of Committees**		
17:45	**9.1 Report of the Finance Committee** [RESERVED]	KCC-22-11-22-09.1	Chair FC
	(i) Financial Statements 2021-22 (to approve)	Annex 1	
	(ii) Update on 2021/22 and 5-year Forward Plan (to approve)	Annex 2	
	See the Consent Agenda for remaining items		

18:10	**9.2 Report of Audit, Risk & Compliance Committee**	KCC-22-11-22-09.2	Chair ARCC
	(i) External Audit Report & Management Letter (to approve)	Annex 1	
	(ii) Annual Report of the Audit, Risk & Compliance Committee (to note)	Annex 2	
	(iii) Portfolio Risk Management	Annex 7	
	See the Consent Agenda for remaining items		
18:30	**9.3 Report of the Governance & Nominations Committee**	KCC-22-11-22-09.3	Chair GNC
	(i) Away Day Follow Up		
	(ii) Comprehensive Communications Strategy on the Role of Council (to discuss)	Annex 1	
	(iii) KCL-UCU Letter re Council Membership	Annex 2	
	See the Consent Agenda for remaining items		
	9.4 Report of the Estates Strategy Committee [RESERVED]	KCC-22-11-22-9.4	Chair ESC
	See the Consent Agenda for all items (all to note)		
19:00	**9.5 Report of Academic Board**	KCC-22-11-22-9.5	Chair AB
	(i) OfS Conditions of Registration (to approve)		
	(ii) HR Excellence in Research Award: Research Concordat Action Plan (to approve)		
	See the Consent Agenda for remaining items (all to note)		
	9.6 Report of the Chairs' Committee	KCC-22-11-22-9.6	Chair
	See the Consent Agenda (to note)		
19:15	**9.7 Report of the Remuneration Committee** [RESERVED]	KCC-22-11-22-9.7	Chair RemCo
10	**Any other business**	Verbal	Chair
11	**Meeting Adjourned**	Verbal	Chair
19:30			

Lord Geidt
November 2022

Unanimous Consent Agenda

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

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

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

Item	Title	Paper	Action
4.1	Minutes of July 2022	KCC-22-11-22-04.1	Approve
4.2	Council Rolling Calendar of Business	KCC-22-11-22-04.2	Note
Report of the Finance Committee		KCC-22-11-22-09.1	All to note
09.1	(i) Investment Subcommittee Annual Report (ii) Chief Finance Officer Report Summary of financial risks Government Autumn spending review summary Fees 2022 Staff loans Severance payments Bad debt write off Current financial position Endowments and investments Debt agreement amendments Pensions Tax strategy and 2020 review Schedule of Insurances		
Report of the Audit, Risk & Compliance Committee		KCC-22-11-22-09.2	
09.2	(i) Annual statement regarding the Prevent duty	Annex 3	Approve
	(ii) Annual Research Integrity Statement	Annex 4	Approve
	(iii) Annual Report of the Director of Business Assurance	Annex 6	Note
	(iv) Internal Assurance update		Note
	(v) Enterprise Risk Management update		Note
	(vi) Risk presentations and discussions: Operational Risk; Risks to the Education Strategy		Note

Report of the Governance and Nominations Committee	KCC-22-11-22-09.3	
09.3 (i) Council and Committee Appointment Recommendations		Note
(ii) Protocol for staff appointments to ARCC		Note
(iii) Ongoing searches update		Note
(iv) Members' Interests Audit		Note
(v) KCL UCU Letter re Council Membership		Note
(vi) Minor Ordinance Amendments		Approve
Report of the Estates Strategy Committee	KCC-22-11-22-09.4	All to note
09.4 (i) Master Planning Update		
(ii) Bush House South-West Wing & VWB Planning		
(iii) KOS – Phase One		
(iv) Estates Management Statistics		
(v) Residential Strategy		
(vi) Major Project Status Report		
(vii) Report of the Director of Estates & Facilities		
Report of the Academic Board	KCC-22-11-22-09.5	All to note
09.5 (i) The Future of Online Education at King's		
(ii) Strategy Refresh		
(iii) Academic Workforce Report		
(iv) Academic Board Standing Committee reports		
(v) Other items approved or noted		
Report of the Chairs' Committee	KCC-22-11-22-09.6	All to note
09.6 (i) Dormant Subsidiary Change of Use		
(ii) Chairs' Committee Updates		

See published minutes from the previous meeting here

Meeting date	20 October 2022
Paper reference	KCC-22-11-22-04.2
Status	Final

Council Calendar of Business

Action required

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

Paper Explanation for Members

Why is this paper being presented?	This rolling forward plan of Council business 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?	The functions of Council are defined in the Charter and Statutes and the Ordinances and include, among other things: • 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 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.
What is required from members?	To discuss and to consider what topics might be assigned to the various strategic-focus meetings for 2022-23.

Paper Submitted by:

Irene Birrell
College Secretary
irene.birrell@kcl.ac.uk

Council Calendar of Business

Strategic discussion

The September meeting was a full-day Away Day. The main theme for this year was the strategy refresh. 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
- 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

Council Calendar of Business

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- Academic Board
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- Chairs' Committee
- Remuneration Committee
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- Ongoing Conditions for OfS
- National Student Survey Results
- Admissions and student number planning
- Safeguarding
- Prevent
- Health & Safety
- Fundraising

Council will annually review:

- Conflict of Interests Policy

Council Annual Agenda Plan

Italicised items are those that are expected to return every year. Meetings shaded in green are intended to be face-to-face meetings while those in blue will normally be held via Teams.

Face to face meetings are held on different campuses with a reception to follow which provides an opportunity for members to meet staff and students across the College.

	Item	Council Action	Submitted By
21 September 2022 **AWAY DAY**	**Strategic focus meeting – full day Strategy Refresh**	Discuss	Principal & Senior Executive Team
22 November 2022 *Teams*	**Business focus meeting**		
	Financial Statements	Approve	Finance Committee
	Update on 22/23 and 5-year Forward Plan	Approve	Finance Committee
	External Audit Report and Management Letter of Representation	Approve	Audit, Risk & Compliance Committee
	Annual Statement regarding the Prevent Duty	Approve	Audit, Risk & Compliance Committee
	Annual Report of the ARCC	Note	Audit, Risk & Compliance Committee
	Internal Audit Update	Note	Audit, Risk & Compliance Committee
	Enterprise Risk Management update	Note	Audit, Risk & Compliance Committee
	Compliance report	Note	Audit, Risk & Compliance Committee
	Annual OfS Registration Report	Approve	Academic Board
	Degree Outcome Statement	Approve	Academic Board
	HR Excellence in Research Report and Academic Plan/Action Plan against the Concordat to Support the Career Development of Researchers	Approve	Academic Board
	Annual Report of the Remuneration Committee	Discuss	Remuneration Committee
	Memorandum of Understanding – KCL/KCLSU	Approve	KCLSU President & President & Principal
19 January 2023	**Strategic focus meeting** (regular meeting length) *Topics to be determined but to include:* Philanthropy/fundraising		
	Modern Slavery Act Annual Statement	Approve	Chief Procurement Officer

30 March 2023 *Teams*	**Business focus meeting**		
	Balanced Scorecard Update	Discuss	SVP Operations/Director of Analytics
	Access and Participation Plan Monitoring Report	Approve	VP Education/Academic Board
	Annual Health & Safety Report	Approve	Audit, Risk & Compliance Committee
	Annual Research Integrity Statement	Approve	Audit, Risk & Compliance Committee
	Annual report of the Chief Procurement Officer	Note	Audit, Risk & Compliance Committee
	Compliance report	Note	Audit, Risk & Compliance Committee
	Fellowships & Honorary Degrees - nominations	Approve	Fellowships & Honorary Degrees Committee
	Annual report on university pay and conditions	Note	Remuneration Committee
	KCLSU Returning Officer's Election Report	Note	KCLSU President
11 May 2023	**Strategic focus meeting** (regular meeting length) Topics to be determined.		
	Council Away Day agenda for September	Note	Governance & Nominations Committee
	Meeting Cycle for the next year but one	Approve	Governance & Nominations Committee
12 July 2023	**Business Focus**		
	Financial Plan	Approve	Finance Committee
	Research Overheads	Note	Finance Committee
	Fundraising Operations Annual Report	Approve	Audit, Risk & Compliance Committee
	Fundraising Ethics Review Group Annual Report	Approve	Audit, Risk & Compliance Committee
	Academic Board Election Results	Note	Academic Board
	Annual report on senior team performance and remuneration	Discuss	Remuneration Committee

Council	
Meeting date	22 November 2022
Paper reference	KCC-22-11-22-05.1
Status	Final

Revisions to Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College London and Process for Rescinding of Honours

Action required

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

Motion:

(a)   That Council approve the proposed revised guidelines for the award of Honorary Degrees and Fellowships of King's College London

(b)   That Council approve the proposed process for rescinding of honours

Paper Explanation for Members

Why is this paper being presented?	Revisions to the Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College London, along with a process for rescinding of honours were presented by the Fellowships & Honorary Degree Committee at the July 2022 meeting. Time did not allow for discussion of the items and it was agreed that they could be considered for approval via email. In the end, the email consideration resulted in some questions and suggested editorial amendments and the matters are therefore returned to this agenda.
What are the key points/issues?	For the Award Guidelines the key changes are: • Merger of the Fellowship and Honorary Fellowship into one category of award • Limitation of the number of honorary degrees awarded in any one year to normally five • Limitation of the types of honorary degrees awarded to: DD, DLitt, LLD, DSc • Requirement that honorary degree nominations be endorsed by an Executive Dean or member of the Senior Executive Team • Honorary Degrees to be awarded individually at a regular graduation ceremony rather than group awards at a ceremony arranged for that sole purpose **For Rescinding of Honours:** a proposal for approval. Currently there is no established process for considering these requests.
What is required from members?	Approval of items

Paper Submitted by:
Irene Birrell, College Secretary irene.birrell@kcl.ac.uk

Revisions to Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College London and Process for Rescinding of Honours

1. <u>Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College London</u>

    The original guidelines submitted for approval at the July 2022 meeting of Council are attached as Annex 1. The following questions were raised after email circulation:

    (i)   The proposal to reduce to four the number of types of honorary degrees awarded makes sense. I think my question about it is only one of fact. I paused on the statement '[DD, DLitt, LLD, DSc] … would not be mistaken for earned degrees'. In some other universities with which I am familiar, these degrees (or variants) are substantive higher doctorates which may be awarded to distinguished academics on the presentation of a body of high quality research work. They can be awarded *honoris causa* to distinguished non-academics, but they may also be earned through academic excellence. In the case of King's, will these degrees only ever be awarded as honorary degrees or could they also be earned as higher doctorates by distinguished academics (on our staff or amongst our alumni)? If the latter, would the number of awards still be restricted to a total of 5?

    In 2010, King's established a category of awards called 'higher doctorates'. It was designed for alumni who did not complete post graduate degrees but who had conducted academic work or research through another process that could be deemed equivalent to completion of a PhD research programme. Individuals had to apply and provide evidence of publications which met the standard of PhD work. Two of those higher doctorates are pertinent as they were titled the Doctor of Letters and Doctor of Science. Very few were awarded (the last in 2016) and while they are still on the list of King's awards, they are noted as 'no longer offered' (a mechanism which is seen as preferable to deleting them fully as they could, potentially, be reactivated without going through a new approval process). There are no plans to reactivate them. If this is a concern, the use of 'Hons' in the post-nominal would resolve it. They have no bearing on the number of honorary degrees that would be awarded in any given year.

    (ii) I understand the sense of restricting the honorary degree awards to a number which allows good quality engagement with those honoured. I only wondered how a total of 5 per year compared to other large Russell Group universities?

    There is a range, but most award about five per year. Some have awarded 9 or 10 in a given year, usually in recognition of a special anniversary.

    (iii) Merging into one category the Fellowships and Honorary Fellowships makes sense to me. The restriction of 10 to the total number of Fellowships, however, seems effectively to be halving the total number of Fellowships to be awarded (previously 10 Fellowships and 10 Honorary Fellowships). Is that right? I wasn't completely clear as to the thinking there.

The Committee's thinking was that the number of awards per year overall is rather large. There are currently over 400 living Fellows of the College. Following is the distribution of awards since 2015:

Year	HD	HFKC	FKC	Total
2021	1	4	9	14
2020	5	8	11	24
2019	5	4	10	19
2018	6	4	10	20
2017	6	7	11	24
2016	6	6	6	18
2015	2	3	13	18

2. Process for Rescinding an Honour

The following comments were received, with proposed amendments attached at Annex 2.

(i) I welcome this, fully support the thrust of it and agree with the way that it is positioned as a grave and unusual decision and one that is not to be taken purely on the grounds of disagreement. I wondered if it should be explicit that it is something which would only happen exceptionally. Point 1 is really about the process being conducted sensitively rather than about there being a high bar for revocation.

(ii) Given that we have already had some quite contentious petitions on this subject, I think this document should be as unambiguous as possible as to what we mean. There are some points which are not spelled out or are implicit in the document which I think should be made explicit. For example:

  a. Who may make a request for a revocation of an award? Anyone at all, or do they have to be connected to King's in some way or, say, currently working or studying at King's?

  b. What is the College Secretary to do when she receives a request for revocation? Must she pass all such requests to the Principal or does she exercise judgement and if so on what basis? [My suggestion would be that she would only do so if there appears to be substantive new information since the award/any previous review.]

  c. Point B2 says 'The Principal will…' does this mean that the Principal must always do this or may do this? I would suggest the latter, but then it needs to be clear on what basis a judgement is to be made. [The fact that a review has been instigated will be disclosable under FoI, I assume, so I would suggest that it should be clear that the decision to undertake a review is a neutral act involving no view as to guilt or innocence. However, again, I would suggest that the Principal must be able to exercise some judgement as to whether or not there is a need for a fact-finding exercise.]

  d. It isn't completely clear what the task of the investigator is. Is it to find the facts or also to make a recommendation, for example [I would suggest mainly the former – to find the facts and to set out for FHDC the key considerations as to whether any of the four criteria for revocation are met.]

  e. I'm not sure that the idea of a 'panel' is helpful. An 'investigator' sounds like someone who goes to investigate and presents a report to someone else for decision. A 'panel' sounds like a decision-making group. I'd have thought we'd want an investigator to investigate, and that if it's complicated, that person might have a team. But isn't FHDC the 'panel'?

  f. It seems clear in the draft that FHDC only considers a case if the investigator/panel thinks there is 'a case to answer'. I think this is a slightly surprising process – I would have thought that the Principal would only commission a review if he considers that there is a case

requiring investigation, but that then the output of any review would be brought forward to FHDC.

g. It is nearly but not quite explicit that FHDC's role is to consider the report of a review and then to make a recommendation to Council. I think the wording 'any' recommendation is unhelpful – would it not be better that FHDC makes a recommendation on every report it receives? This recommendation then goes to Council, which considers it and makes a final decision. Following such a decision by Council, the matter can only be re-opened if there is 'substantial new information'.

h. It isn't explicit that only full Council may decide to remove an honour.

(iii) On some detail of the drafting:

a. Point A3 'Reviews will only be conducted…' – the idea of a 'review' hasn't yet been introduced or explained – and actually it never is. At what point is it a 'review' – is it when the Principal assigns an investigator? But then point B2 says that the Principal 'will' do that, without qualification.

b. Also in A3, I think the words 'for good reason' are unhelpful. We don't want a debate about whether the reason information wasn't available was good or bad – the point is only that it wasn't available to decision-makers.

c. In A4 – isn't the point that honours will not normally be rescinded posthumously? [And what does 'normally' mean here?]

d. In A5 – I think that logically, A5.1-4 are (almost) the criteria for revocation. But the 'stem' confuses that and so does some of the language 'information that…', 'there is evidence that…'.

The proposed editorial revisions are detailed but do not substantially change the process as envisaged by the Fellowships & Honorary Degrees Committee in its original submission. In some cases, the proposed new language makes the process clearer.

Annex 1 – FHDC submission to Council, July 2022
Annex 2 – Rescinding of Honours Protocol – Proposed Revisions to FHDC Text

Irene Birrell, College Secretary
November 2022

King's College Council		
Meeting date	13 July 2022	
Paper reference	KCC-22-07-13-11.2	
Status	Final	

Report of the Fellowships & Honorary Degrees Committee (FHDC) - July Paper

Contents	Meeting at which considered	Consent agenda	Council action
1. Revisions to Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College London	30 March 2022	No	Approve
2. Process for Rescinding of Honours	30 March 2022	No	Approve
3. Court of Benefactors	30 March 2022	Yes	Note

For Approval

1. **Revisions to Guidelines for the Award of Honorary Degrees, Honorary Fellowships and Fellowships of King's College Council**

    Motion: That Council approve the revised Guidelines, attached as **Annex 1**.

    Background: The Fellowships & Honorary Degrees Committee has conducted a comprehensive review of the guidelines, processes and criteria by which we select and honour outstanding individuals. In particular the Committee looked at the following:
    - consider how to enhance the processes for selecting honorary degree candidates and strengthen that category
    - through enhanced processes, engage the Executive Deans more in identifying potential candidates and in developing relationships with recipients
    - distinguish more clearly among the three awards of Honorary Degree, Honorary Fellowship and Fellowship

    With respect to honorary degrees, the Committee was keen to have these foregrounded as our most prestigious award. The Committee agreed that the number of honorary degrees should be limited, that they should be conferred on individuals of international or national prominence, and, over time, represent the full breadth of academic activity at King's.

    The Committee also noted that, under our current nomination processes, the list of candidates received in any given year was ad hoc and the quality of the nominations was highly variable. It was felt that engaging Executive Deans and their faculty colleagues more closely in the nomination process would lead to more fully developed nominations and a greater range of candidates.

    The current means by which we confer honorary degrees does not encourage a sense among recipients that upon conferral they become part of the King's community. All degrees are conferred at one, standalone ceremony followed by a dinner. There are no processes for, or any expectation that, recipients might engage otherwise and the connection is therefore often tenuous at best.

    To address these issues, key amendments to the guidelines include the following:

- Limit the number of honorary degrees conferred in any one year to about five
- Develop a process for soliciting and developing nominations that would include the Executive Deans and the University Executive
- Establish a panel for first scrutiny of nominations to be managed by the Principal
- Confer honorary degrees at appropriate graduation ceremonies rather than in a stand-alone ceremony
- Engage Executive Deans and academic leaders to 'host' honorees

A further proposal is to limit the types of honorary degrees we award to four: Doctor of Laws (LLD), Doctor of Arts & Letters (DLitt), Doctor of Science (DSc), Doctor of Divinity (DD). Over the years, King's has awarded up to 12 different types of honorary degree many of which are not common elsewhere or easily recognised as honorary degrees outside King's. The four suggested are in common use in academia in the UK and internationally and would not be mistaken for earned degrees.

With respect to Fellowships, language has been added to distinguish these as being focused on service to King's or a relationship with King's that has, or would, bring benefit to the College. The most substantive suggestion, however, is that we merge the Fellows and Honorary Fellows categories into Fellow of King's College London award while recognising that there would be different criteria for the award depending on whether a recipient had an existing direct relationship with King's or not. The title of 'Honorary Fellow' is in many ways an artifact of a time when King's was not able to confer its own earned or honorary degrees but rather had them conferred through the University of London.

2. **Process for Rescinding Honours**

    Motion: That Council approved the proposed process for rescinding honours, attached as **Annex 2**.

    Background: Last year Council asked the Committee to develop a process to assist with cases in which the College is asked to consider removing an honour. A proposal is attached for consideration.

For Note

3. **Court of Benefactors**
    While reviewing the guidelines and criteria for the award of honorary degrees and fellowships, the Committee discussed issues related to the appropriate means by which to recognise significant donors to the College. The creation of a Court of Benefactors (working title) was one solution suggested. Discussions of this are ongoing with the Fundraising & Supporter Development team and a proposal will likely come to the Council for discussion in the Autumn term.

Irene Birrell
College Secretary

Revised Criteria and Processes for Awards -July Paper

The awarding of an honorary degree or Fellowship of King's College London is an important event in the life of the College. These awards are conferred on those whose achievements are of such excellence that they provide, through example, inspiration and aspiration to our graduates. They recognise service or contributions that are or have been transformative.

These are our highest honours recognising distinct groups and types of accomplishment over a wide range of fields of endeavour.

Honorary Degrees

An honorary degree is the highest honour that King's bestows and is reserved for exceptional and eminent individuals who are recognised nationally or internationally for their achievements and whose actions reflect and reinforce King's values and aspirations. While a prior association with King's strengthens a claim, it is not a requirement; recipients of a King's honorary doctorate become alumni of the College.

The number of awards is limited normally to five in any one year.

Honorary degrees are conferred at graduation ceremonies and normally will not be awarded *in absentia*.

King's awards the following honorary degrees:

> Doctor of Laws (LLD)
> Doctor of Arts & Letters (DLitt)
> Doctor of Science (DSc)
> Doctor of Divinity (DD).

Fellowship of King's College (FKC)

The Fellowship of King's College is awarded to individuals who have or have had a transformative impact on the College through the quality of their work or activities. They may be individuals who have a direct relationship with King's (e.g., alumni, governors, staff, academic or community partners) or they may be individuals who do not have a current relationship with King's but who have engaged with King's, or whose activities and accomplishments align with our activities, aspirations and values and with whom a continued relationship would be welcome.

In either case, it is expected that the individual's accomplishments will have gone above and beyond the expectations of their regular role. For those who do have an existing relationship with King's, while long service may be an element of the award it will not be the primary criterion for the award. For those nominees not currently engaged with King's, the application process will give attention and consideration to the degree and depth of any prior association and the implications of the award for future association.

Fellows are acknowledged at graduation ceremonies and recipients are invited to attend.

Processes

1. Any member of the College may nominate or second a Fellow.
2. Honorary degree nominations should be associated with a Faculty or senior directorate and should be supported by the relevant Executive Dean/Vice Principal/SVP in addition to the nominators.
3. All nominations will be provided to the Fellowships & Honorary Degrees Committee, however, in considering the nominations, the FHDC will receive advice from a subcommittee established by the President & Principal.
4. Fellowships and Honorary Degrees are normally mutually exclusive. It would be unusual, though not impossible, for an individual to hold both an Honorary Degree and an FKC.
5. The FHDC may determine that an award other than that for which a candidate has been nominated is more appropriate.
6. Recommended nominees must be approved by Council.
7. No more than five honorary degrees will normally be conferred in a given year.
8. Honorary degree recipients must attend a graduation ceremony in order to receive the honour.
9. Up to ten Fellows may be awarded in a given year. The title is considered effective with written acceptance of the honour.
10. Fellows will be recognised at graduation ceremonies and may attend a ceremony if they wish.
11. When an honorary degree candidate has been offered and accepted an honorary degree, they will be invited to engage with the College as appropriate. This would ideally coincide with their visit to the College to have the degree conferred and take the form, for example, of a meeting with faculty and students in the relevant department(s), giving a graduate seminar or a public lecture, etc. It will be the responsibility of the Executive Dean/relevant senior leader to engage with the recipients to make these arrangements and to foster any further engagement which they and the candidate might agree.
12. Nominations remain confidential and candidates should not be informed that they have been nominated.
13. Only the names of those who have been offered and have accepted an award will be announced. The timing of the announcement will be determined once the award has been approved by Council.
14. Honours are not normally awarded posthumously. In exceptional circumstances the Committee may recommend posthumous awards under the following conditions:

    - The candidate has had a close or significant relationship with the College;

    - The nomination was submitted prior to the candidate's death; and

    - The candidate's family is willing to accept the proposed award on the candidate's behalf.

15. Removal of an honour – Council may determine that an honour should be rescinded on the recommendation of FHDC and in accordance with the Council's protocol.

Guidance on the Application of Awards - Current

The following points of guidance on the application of awards were approved at the meeting of the Committee in November 2011 and are provided again this year to assist the Committee's decision making.

The criteria for the conferral of the Fellowship, Honorary Fellowship and Honorary Degree of the College are set in the College's Ordinances:

C3.2 **Honorary Degrees**

Honorary Degrees of King's College London shall be awarded in recognition of an individual's conspicuous merit as demonstrated by their outstanding distinction. The number of Honorary Degrees awarded by the College in any one calendar year shall not normally exceed ten.

C3.3 **Fellowship**

The Fellowship of King's College London (FKC) shall be awarded to those who are, or who have been, a member of staff, a member of the Council or a student of the College in recognition of their exceptional achievement and/or service rendered to the College. The number of Fellowships awarded by the College in any one calendar year shall not normally exceed ten.

C3.4 **Honorary Fellowship**

The Honorary Fellowship of King's College London (FKC) shall be awarded to those who are not, and have not been, a member of staff, a member of Council, or a student of the College in recognition of their exceptional achievement usually in fields outside academic life. The number of Honorary Fellowships awarded by the College in any one calendar year shall not normally exceed ten.

C3.5 **Relationship between awards**

The awards of the Honorary Degree of King's College London and the Fellowship or Honorary Fellowship of King's College London are not mutually exclusive, although instances where both awards are made to the same individual are expected to be rare.

The most explicit rule set in these Ordinances is that the Fellowship and the Honorary Fellowship are mutually exclusive and are determined by the nature of the nominee's relationship to the College. The Fellowship is available to those who have or have had a close connection to King's through being a student, staff member or member of the College Council, while the Honorary Fellowship is only open to individuals who fall outside these categories. Otherwise, the Ordinances deliberately give the Committee considerable freedom to determine the most appropriate category of award for an individual. In so doing, the Committee is not bound by the choice of the nominator and can bestow an award in a different category which it believes would be more suitable.

In making its decisions, the Committee shall consider the following points:

- The College's position is that the Fellowship/Honorary Fellowship and the Honorary Degree are equally important and meritorious honorary awards. However, they are different in nature. The Fellowship/Honorary Fellowship is deeply rooted in the history of the College and well regarded within King's. The Honorary Degree is a more recent creation (the College began conferring honorary degrees of the University of London in 2007, and its own honorary degrees in 2008), but is likely to be better understood and recognised internationally.

- The Fellowship is more likely to be appropriate than the Honorary Degree in the case of individuals who are under consideration because of their current or previous connection to King's. Ordinance C3.5 indicates as much by suggesting that while the Honorary Degree and the Fellowship are not mutually exclusive, instances of an individual being eligible for both are expected to be rare. The Fellowship is clearly the appropriate award where an individual's service to College is the primary point under consideration. Only in the most exceptional circumstances should the Committee recommend an individual for an Honorary Degree when the Fellowship could be awarded instead, or when the Fellowship has already been awarded.

- With regard to the Honorary Fellowship and the Honorary Degree, the Committee should consider the wider international recognition of the Honorary Degree and the fact that this award has been conferred in the past on individuals with a truly outstanding record of academic or intellectual achievement. The Committee's former terms of reference (predating the Ordinances) indicated that the Honorary Degree was an appropriate award for heads of state, reflecting the international standing of the award.

- While the College's Ordinances do not set an absolute limit on the number of awards that can be conferred per year, to avoid devaluing the awards, they provide clear guidance that more than ten awards in each category per year should be treated as exceptional. Consequently, the Committee should usually defer deserving nominations to the following year rather than exceed the indicative quota set in the Ordinances.

November 2011

Rescinding of Honours Protocol (Proposed Revisions)

A.   Principles & Criteria

1.   Removing an honour from an eminent individual or from someone who has been of significant service to the College is a grave decision and one that will only be taken exceptionally. Only Council may rescind an honour which it has awarded. Any consideration of revocation must be undertaken sensitively, with care and with due consideration of fairness toward and respect for the privacy of the individual concerned.

2.   In support of the tenets of freedom of expression, which are fundamental at a university, ideological difference with members of the university community or with the university's stakeholders is not in and of itself grounds for review or revocation.

3.   Council will not consider revocation of an honour unless it receives substantial new information which, for good reason, was not available to it at the time of the award (and at the time of any previous consideration by Council). It will not rescind an honour unless in its judgement one or more of the following apply:

    3.1   There are findings of serious misconduct, criminal activity or adverse findings in civil proceedings or disciplinary proceedings by regulatory authorities

    3.2   The original rationale for conferring the award was materially inaccurate.

    3.3   The individual has acted in a way that is fundamentally inconsistent with the values of the university

    3.4   The reputation of the university will be damaged from continued association with the individual concerned and the damage from maintaining the award will be greater than from revoking it.

4.   If in its judgement, one or more of criteria 3.1-3.4 apply, Council may choose to rescind an award. Council will not, normally, revoke or consider revoking an award posthumously. Before reaching a decision, Council will ensure that the following process has been followed.

B.   Process

1.   Any member of the King's College community may request that Council revoke an honour. Requests for review or revocation of an award must be submitted to the College Secretary. If on receipt of such a request the College Secretary judges that there is or may be new information not available to Council at the time of its previous consideration of the individual, the Secretary shall forward the request to the Principal.

2.   On receipt of such a request, if the Principal determines that there is or may be substantial new information and it is necessary to establish the veracity of such new information and/or that the information requires examination to determine whether or not it provides reason for Council to reconsider the award of the honour, then the Principal will appoint an investigator they judge suitable to investigate the case. The decision to appoint an investigator is a neutral act.

3.   The investigator will be tasked with establishing the facts of the case, bearing in mind the reasons for the request for revocation and criteria A3.1-4 above. The investigator will produce a report for

the Fellowships and Honorary Degrees Committee (FHDC) which sets out the facts as they relate to the criteria. The investigator may be supported by other staff at the investigator's discretion.

4. The investigation report will be provided to the Fellowship & Honorary Degrees Committee. The Principal may provide advice and/or recommendations to the FHDC at the same time.

5. TheFellowships & Honorary Degrees Committee will consider the case. If FHDC consider that there may be a case for the award to be rescinded, they will ensure that the recipient of the award has an opportunity to respond before reaching a view. FHDC will recommend to Council either that an award should be rescinded or that it should not be and may provide such other recommendations or advice as it judges appropriate.

6. Council will consider FHDC's recommendation and reach a decision as to whether or not an honour should be revoked. Council's decision is final.

Rescinding of Honours Protocol (Proposed Revisions)

A.   Principles & Criteria

1.   Removing an honour from an eminent individual or from someone who has been of significant service to the College is a grave decision and one that will only be taken exceptionally. Only Council may rescind an honour which it has awarded. Any consideration of revocation must be undertaken that must be taken sensitively, with care and with due consideration of fairness toward and respect for the privacy of the individual concerned.

2.   In support of the tenets of freedom of expression, which are fundamental at a university, ideological difference with members of the university community or with the university's stakeholders is not in and of itself grounds for review or revocation.

3.   Council will not consider revocation of an honour unless it receives Reviews will only be conducted on receipt of substantial new information which, for good reason, was not available to it at the time of the award (and at the time of any previous consideration by Council). It will not rescind an honour unless in its judgement one or more of the following apply:previously.

4.   Reviews will not normally be undertaken posthumously.

5.   The following will be considered in determining (a) whether there is a case to answer and (b) what action, if any should be taken.

> 3.1   There are findings of serious misconduct, criminal activity or adverse findings in civil proceedings or disciplinary proceedings by regulatory authorities
>
> 3.2   Information that calls into question theThe original rationale for conferring the award was materially inaccurate.
>
> 3.3   There is evidence that theThe individual has acted in a way that is fundamentally inconsistent with poses a fundamental contradiction of the values of the university
>
> 3.4   There is risk that theThe reputation of the university is will be damaged from continued association with the individual concerned and the damage from maintaining the award will be greater whether the reputational risk is greater in maintaining the award than from revoking it.

4.   If in its judgement, one or more of criteria 3.1-3.4 apply, Council may choose to rescind an award. Council will not, normally, revoke or consider revoking an award posthumously. Before reaching a decision, Council will ensure that the following process has been followed.

B.   Process

1.   Any member of the King's College community may request that Council revoke an honour. Requests for review or revocation of an award must be submitted to the College Secretary. If on receipt of such a request the College Secretary judges that there is or may be new information not available to Council at the time of its previous consideration of the individual, the Secretary shall forward the request to the Principal.

2.   On receipt of such a request, if the Principal determines that there is or may be substantial new information and it is necessary to establish the veracity of such new information and/or that the

information requires examination to determine whether or not it provides reason for Council to reconsider the award of the honour, then the Principal will appoint an investigator they judge suitable to investigate the case. The decision to appoint an investigator is a neutral act. ~~The Principal will assign the request to a member of the College or to a specially-convened panel for consideration and/or investigation. The choice of investigator or membership of any panel will be determined by the nature of the case and the issues alleged.~~

3.   The investigator will be tasked with establishing the facts of the case, bearing in mind the reasons for the request for revocation and criteria A3.1-4 above. The investigator will produce a report for the Fellowships and Honorary Degrees Committee (FHDC) which sets out the facts as they relate to the criteria. The investigator may be supported by other staff at the investigator's discretion.

~~3~~4.   The investigation report ~~Reports of investigators/panels~~ will be provided to the Fellowship & Honorary Degrees Committee. The Principal may provide advice and/or recommendations to the FHDC at the same time.

~~4~~5.   The~~If the investigator/panel has determined that there is a case to answer, the~~ Fellowships & Honorary Degrees Committee will consider the case. If FHDC consider that there may be a case for the award to be rescinded, they will ensure that the recipient of the award has an opportunity to respond before reaching a view. FHDC will recommend to Council either that an award should be rescinded or that it should not be and may provide such other recommendations or advice as it judges appropriate.

~~5.   The FHDC will report its findings and any recommendations to Council for consideration.~~

~~6.   Before moving to a decision to remove an award, Council will provide the individual concerned an opportunity to respond to concerns raised.~~

~~7~~6.   Council will consider FHDC's recommendation and reach a decision as to whether or not an honour should be revoked. Council's decision ~~with respect to any review~~ is final.

King's College Council

Meeting date	22 November 2022
Paper reference	KCC-22-11-22-05.2
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	Decision for Action	Notes	Owner	Original deadline	Progress
July 2022 Council Meeting							
13.07.22	8.1	Draft Budget 2022/2023	Executive Team present the total forward developing Strategy Refresh financial plan to the next Finance Committee.		Principal	November 2022	Complete
	8.4	Breakthrough Investment in Students and Education	Expenditure of sufficient resource be authorized to keep the Student Success Transformation Programme moving forward pending a fuller consideration in September.		VP (Education)	September 2022	In progress
May 2022 Council Meeting							
March 2022 Council Meeting							
January 2022 Council Meeting							
November 2021 Council Meeting							
23/11/21	7.1 (iii)	Finance Committee **(Private & Confidential)**	**LIHE FBC** The Chair (ARCC) suggested this project could be a good candidate for review of benefits two to three years out against what was promised.		SVP (Operations)	Not due until 2023 or 2024	In progress
July 2021 Council Meeting							
May 2021 Council Meeting							
26/05/21	10	AOB: Climate Risk	Future in-depth discussion of ESC/Climate Change/Climate Risk	ESC discussed in September 2021	College Secretary	Academic Year 2021/2022	In progress – deferred to discussions of strategy
March 2021 Council Meeting							

Meeting	Minute	Topic	Decision for Action	Notes	Owner	Original deadline	Progress
31/03/21	7.1 (iii)	Financial Outlook and Risks	The Finance Committee to receive a report on the Research Deficit Plan from the Vice-President (Research), which it would then report to Council	Update through Research Sustainability workstream of the Strategy Refresh programme	VP Finance/ Chair FC/VP Research		Complete
January 2021 Council meeting							
30.01.20	6.3	OfS – Access & Participation	Briefing on the nature of the requirements for reporting purposes to be scheduled for Council members	Schedule a briefing	College Secretary	January 2021	In progress – OfS is amending its timelines and requirements

Irene Birrell

College Secretary

November 2022

Council

Meeting date	22 November 2022
Paper reference	KCC-22-11-22-05.3
Status	Final
Access	Members and senior executives

Student Success Transformation Programme

Action required

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

Motion: To approve the establishment of the Student Success Transformation Programme and its associated governance and funding of £13.3m from the Strategic and Capital Investment Fund

Paper Explanation for Members

Why is this paper being presented?	Approval is being sought from Council to release a first tranche of funding for the Student Success Transformation Programme, specifically £13.3m of SCIF, to fund both design and delivery activity over the next 24 months.
What are the key points/issues?	• Stubborn issues continue to impact the student experience and student success • Student success is the primary pillar of Strategy 2026 and investment (time and resources) is necessary to address these issues through an explicit programme of accelerated change and transformation • The 24 month programme will address accountabilities and expectations, culture, process consistency and use of technology to support students and staff • Additional leadership and technical capacity and explicit governance will keep the programme focused on benefits realisation.
What is required from members?	Comments on the programme and approval of the recommendations in the motion

Paper History

Council discussed a summary of the Full Business Case (FBC) at its meeting of 13th July 2022. The discussion at the preceding bodies had considered the detailed full business case. The present document represents an iteration of the programme and a further articulation of its rationale, focus and outputs following Council's feedback.

Action Taken	By	Date of Meeting
Reviewed	Investment Advisory Sub-Committee	18th May 2022
Approved	University Executive	9th June 2022
Recommended	Finance Committee	22nd June 2022
Discussed	Council	13th July 2022

Paper Submitted by:

Professor Rachel Mills, Senior Vice President (Academic); Professor Adam Fagan, Vice President (Education and Student Success); Steve Large, Senior Vice President (Operations); Darren Wallis, Executive Director (Education and Students)

Student Success Transformation Programme

1. 'Enabling Student Success' is the first stated goal of Strategy 2026 and is the university's highest strategic priority. A transformation programme is necessary to achieve a step change in the student experience by addressing stubborn issues. This will require investment in systems and processes, enhancing services, resetting expectations and accountabilities across the university, change management, and leadership focus and capacity. Significant diagnostic, preparatory and proof-of-concept work has been undertaken. Approval is now being sought to release investment that will enable the full 24-month programme to be initiated and governance and oversight established.

2. The intention is to create sustainable improvements by moving beyond a project-by-project approach and by ringfencing investment and resources so that transformative initiatives are not crowded out by maintenance activities. The Student Success Transformation Programme Board will be comprised of much of the senior leadership of the university, including the Senior Vice President (Academic), the Vice President (Education & Student Success), the Senior Vice-President (Operations), the Chief Information Officer, the Chief Finance Officer and the Executive Director of Education and Students. Additionally, we have appointed a senior and experienced Executive Director of Transformation for Education and Student Outcomes who will start with us in Spring 2023. There will be strong co-design and consultation mechanisms built in, with KCLSU, the wider student body and staff.

Context and programme focus

3. King's is an increasingly popular university of choice for students. Entry standards and the quality of students have been raised and the university has become distinctly more selective. At the same time, King's has excelled in widening participation and has the most diverse student body in the Russell Group. Graduate outcomes and employer views of King's are comparatively strong. Evaluations of classroom delivery and of individual modules are generally strongly positive.

4. But these positive factors do not add up to a student experience that meets the expectations of students, staff, leaders, or governors. There are barriers that get in the way of student success. This is manifest in low and uneven student satisfaction scores, especially for undergraduates. There is some excellent practice, but also variation, and students can feel the inconsistencies. Although applications to study are currently high, a low domestic league table position, driven by student satisfaction, represents a long-term risk.

5. For academic staff, surveys reveal high numbers who state that they are being taken away from their core work by inefficient administration. This prevents a focus on developing their teaching and creates frustration. Professional services staff feel overstretched and similarly prevented from offering the right level and quality of support, with multiple single points of failure. The university is also carrying significant compliance risks, not least with respect to the Office for Students Conditions of Registration and its UKVI sponsorship licence which are mitigated at present by complex manual processes and interventions.

Diagnosis

6. The reasons are multiple, but the infrastructure supporting education is not set up for King's current scale and complexity. Student numbers have doubled over the past decade. Our models of educational delivery are the product of acquisition, mergers, partnerships, and the evolving relationship with the University of London, all adding complexity to ways of doing things. King's has more students in placement settings, across a wider range of sites, than any other university. As a result, some control of the adherence to the policies and processes that underpin the end-to-end student journey has been lost through a period of rapid growth and diversification of activities.

Student expectations have also shifted very significantly, with much higher demand and salience of issues such as mental health support.[1]

7. King's has a dated and complex systems infrastructure supporting education and students, with some 78 IT systems in use, which are highly inter-dependent. King's has been gradually addressing its technical debt, especially around the digital environment and corporate systems in HR and Finance, based on a 'best in breed' and 'cloud first' IT strategy. Foundational steps, such as a move of the virtual learning environment and the student records system to a cloud-based, Software As A Service platform have now been completed. But there remains significant complexity to be addressed in improving and simplifying the systems landscape and how students can more easily navigate it. Only a small proportion of total IT operating capital has been invested in Students & Education over the last few years and the majority of that has been in 'replacement and continuity' projects. One consequence is that we are not able to make the most of the data we hold about our students, to inform both our academic practice and service provision in support of their success, nor to confidently make this available to students themselves for their own reflection and development. A summary of the key problems that the programme is intended to address is provided in Annex 1.

How the programme responds to these issues

8. Some of these issues are amenable to being fixed in the short run, and in a low-tech way. Others are deeper rooted and require careful reconstruction of the infrastructure supporting education, including technology. Hence the programme operates on both a short-run and a long-run timeframe. Immediate priority developments will include a defined number of projects and initiatives to address significant barriers to student success, deliver tangible benefits and build confidence for change (see Annexes 1-3). This will work alongside, and reinforce, the strategy for the National Student Survey, approved in July and discussed at the Council Strategy Away Day in September. The programme is inclusive by design and is intended therefore to serve to remove barriers to participation, progression, attainment, and satisfaction.

9. Recent proof of concept work to evidence deliverability includes the rapid deployment of the King's Student App; the pilot of a King's First Year Gateway module; the stabilisation of examination processes, both in-person and on-line; the introduction of personalised timetables in Medicine; the establishment of an institution-wide welfare and wellbeing service; the launch of the Report + Support platform and the launch of a bespoke development programme for Programme Leads.

10. The Student Success Transformation Programme has been designed to provide the necessary focus, resources and control to deliver the strategic ambition to enable student success. This will be a multi-year portfolio of work, impacting the whole university and its ways of working and culture. It will operate across four workstreams that define the student journey and interactions with the university. Delivery, benefits and risks will be managed through the Student Success Transformation Programme Board, while regular reports to the College Education Committee will support academic engagement and quality assurance. Further oversight will be provided via the Portfolio & Benefits Oversight Sub-Committee, reporting to University Executive, as well as regular Strategy 2026 and major project updates reported directly to Council.

11. Effective change management and communications support has been identified as critical to the successful delivery of the programme. A comprehensive programme approach to change will be developed to support the delivery of the projects and reduce the key change risks: ambiguous expectations; change fatigue and overload; poor project acceptance and reduced benefits for

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[1] Detailed analyses have been undertaken by third party specialists that confirm the extent of these issues at King's and a fuller diagnosis is provided in the Full Business Case.

students; and stress and negative impacts on staff. Change management tools such as change impact assessments and stakeholder analysis will be used at programme and project level to prepare, equip and support individuals and teams to successfully adopt common ways of working and enable benefits delivery. We will aim to strike an appropriate balance of 'tell' and 'sell', enabling staff to contribute and shape solutions but being clearer on the non-negotiables.

Critical Success Factors

12. To achieve its objectives, the programme has identified a number of critical success factors:

Success factor	How this is met through the programme	Aligned projects in Phase 1
Regaining full visibility and control of education practices and data: resetting expectations and accountabilities across the university	Creating a comprehensive, single source of truth for modules, programmes and students. Begin to use data more effectively to enhance student success. Enhanced quality assurance framework and regulations. Process simplification in all core academic administration processes and explicit process ownership introduced. Developing and equipping programme leaders and Heads of Department. Strengthening King's Academy to set academic expectations and to support staff to deliver, especially around Assessment.	Curriculum Management Timetabling Data Governance Assessment & Feedback Personal Tutor Dashboard
Co-creation: bringing together students, faculty and central services in designing new processes, systems and ways of working.	Business process review centred around the voice of the customer, with a default of a single approach across all faculties. Co-design built into SSTP programme and project governance. Implement the student voice partnership agreement with KCLSU. Develop the social functionality of the App for engagement with targeted groups. User communities embedded into specialist support services.	King's Student App Student Voice Student Enquiry Management Specialist Support King's First Year
Invest at enhanced levels and with ringfenced resource for transformative projects	Tight prioritisation and protected investment in the student experience. Focus on benefits realisation and ROI, at workstream and programme level. Shift from transactional to value adding work, better targeting support to students. Drive down cost per student and deliver simple, nimble and effective services.	All projects in Phase 1 are transformative projects Ongoing maintenance (e.g., system upgrades) are to be governed and financed separately
Add capacity and capabilities: both in transformation expertise, but also in enhancing some key services	King's Portfolio Office and a strengthened education Strategic Programmes Office, with project, change, benefits and training expertise. Appointment of new Executive Director for Transformation. Use of technology and process review to drive a change in the operating model. Buy out and backfill of Subject Matter Experts to provide capacity to drive change and improvement projects.	Specialist Support Timetabling Student Enquiry Management King's Student App

Financial envelope

13. Since the programme was first presented, an experienced programme and project accountant has been contracted to test the financial assumptions behind the programme. A bottom-up review has been undertaken to validate, update and document cost assumptions, in conjunction with programme team members, and is supported by a cost model which has been quality assured by the Finance Office. This covers Phase 1 projects and the establishment of the programme structure and estimated project costs are included in Annex 3. A key risk for the programme (and for other programmes) are current structural issues in the IT labour market, with King's IT carrying a large

number of vacancies. This constitutes a deliverability risk, where projects may be difficult to complete if specialist resource is not available within IT, but also a financial risk where (more expensive) contractors may be needed in lieu of salaried staff for completion. The Programme Board will manage these risks within the envelope approved by Council, reporting to University Executive.

Conclusion

14. A step change in the experience, success and satisfaction of King's students is both necessary and achievable. We have in place the leadership commitment and appetite for collective focus across faculties, central directorates and the student body. We have a clear diagnosis and have learned from external specialists and peer institutions that have undertaken similar programmes. We have also undertaken critical foundation work and proof of concept projects over the past year. Our programme and project capacity and controls have been much strengthened, and we will be adding further leadership capacity and experience to this when the new Executive Director joins in the new year. It is critically important for our students that we now move from incremental improvement projects into a sustained, high-impact programme across the whole institution.
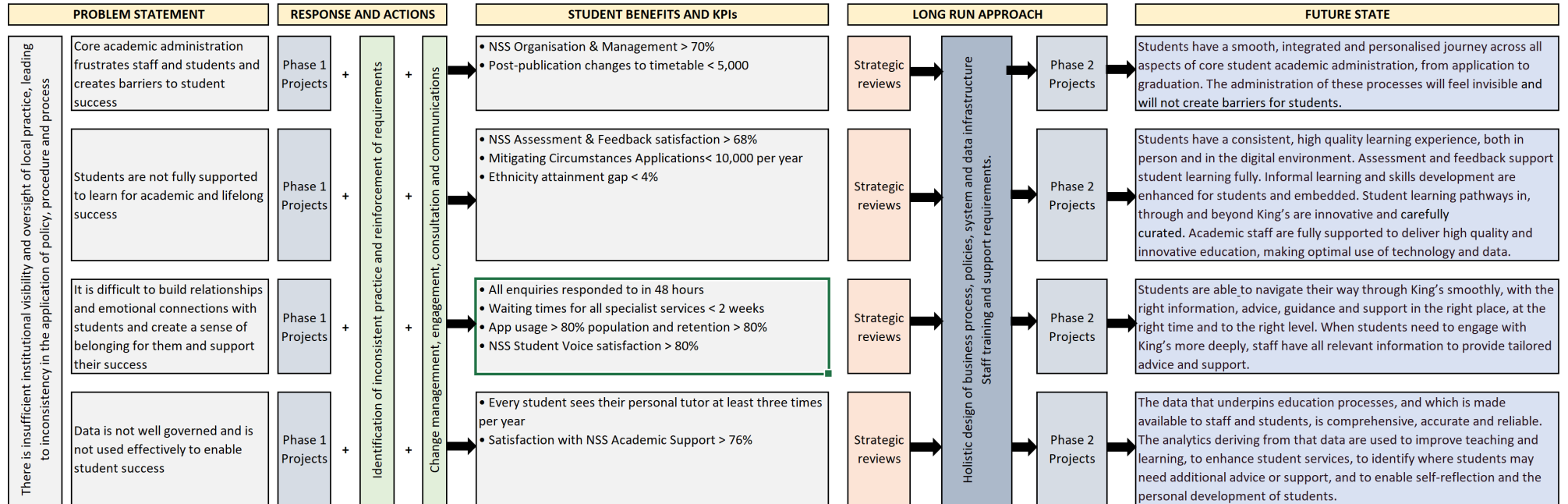
    Annex 1 – Overall Programme Structure.
    Annex 2 – Phase 1 Projects, Deliverables and Benefits.
    Annex 3 – Immediate Priority Projects and budget estimates.
    Annex 4 - Student Success Transformation Programme Governance Structure

ANNEX 1: OVERALL PROGRAMME STRUCTURE

PROBLEM STATEMENT	RESPONSE AND ACTIONS	STUDENT BENEFITS AND KPIs	LONG RUN APPROACH	FUTURE STATE

There is insufficient institutional visibility and oversight of local practice, leading to inconsistency in the application of policy, procedure and process

Core academic administration frustrates staff and students and creates barriers to student success

Phase 1 Projects + Identification of inconsistent practice and reinforcement of requirements + Change management, engagement, consultation and communications →

- NSS Organisation & Management > 70%
- Post-publication changes to timetable < 5,000

Strategic reviews → Holistic design of business process, policies, system and data infrastructure. Staff training and support requirements. → Phase 2 Projects →

Students have a smooth, integrated and personalised journey across all aspects of core student academic administration, from application to graduation. The administration of these processes will feel invisible and will not create barriers for students.

Students are not fully supported to learn for academic and lifelong success

Phase 1 Projects + +

- NSS Assessment & Feedback satisfaction > 68%
- Mitigating Circumstances Applications < 10,000 per year
- Ethnicity attainment gap < 4%

Strategic reviews → Phase 2 Projects →

Students have a consistent, high quality learning experience, both in person and in the digital environment. Assessment and feedback support student learning fully. Informal learning and skills development are enhanced for students and embedded. Student learning pathways in, through and beyond King's are innovative and carefully curated. Academic staff are fully supported to deliver high quality and innovative education, making optimal use of technology and data.

It is difficult to build relationships and emotional connections with students and create a sense of belonging for them and support their success

Phase 1 Projects + +

- All enquiries responded to in 48 hours
- Waiting times for all specialist services < 2 weeks
- App usage > 80% population and retention > 80%
- NSS Student Voice satisfaction > 80%

Strategic reviews → Phase 2 Projects →

Students are able to navigate their way through King's smoothly, with the right information, advice, guidance and support in the right place, at the right time and to the right level. When students need to engage with King's more deeply, staff have all relevant information to provide tailored advice and support.

Data is not well governed and is not used effectively to enable student success

Phase 1 Projects + +

- Every student sees their personal tutor at least three times per year
- Satisfaction with NSS Academic Support > 76%

Strategic reviews → Phase 2 Projects →

The data that underpins education processes, and which is made available to staff and students, is comprehensive, accurate and reliable. The analytics deriving from that data are used to improve teaching and learning, to enhance student services, to identify where students may need additional advice or support, and to enable self-reflection and the personal development of students.

ANNEX 2: PHASE 1 PROJECTS, DELIVERABLES AND BENEFITS

Deliverables

Academic administration

FY 22/23 | **FY 23/24** | **FY 24/25**

- ✓ Timetabling
- ✓ Exams
- ✓ Curriculum mgt
- ✓ Module Choice

Benefits
- Fewer late changes, fewer clashes
- Reduced staff time making changes
- Improved student experience
- Full and accurate information
- Less variation in experience

Supporting student learning

FY 22/23 | **FY 23/24** | **FY 24/25**

- ✓ Assessment & Feedback
- ✓ King's First Year
- ✓ Flex Curriculum
- ✓ King's Edge

Benefits
- More consistent student experience
- Earlier feedback to students
- Transition support to enhance retention
- Greater student choice
- Wider range of skills for students
- Supported through to employment

Relationships, knowledge, communication

FY 22/23 | **FY 23/24** | **FY 24/25**

- ✓ Mobile app
- ✓ Student Enquiry Mgt
- ✓ Student Voice
- ✓ Specialist Support

Benefits
- Single route to access information
- Faster communication and responses to enquiries
- Greater self-service
- More capacity for complex queries
- Holistic view of support provided
- Reduce waiting time for support

Data and Analytics

FY 22/23 | **FY 23/24** | **FY 24/25**

- ✓ Personal Tutor Dashboard
- ✓ Data Governance

Benefits
- Strengthened academic support
- Earlier insight of student disengagement
- Greater data accuracy and compliance

King's College LONDON

ANNEX 3: IMMEDIATE PRIORITY PROJECTS

King's Student App
Anticipated timelines: Phase 1: Delivered Sept 2022; Phase 2: Oct 22-June 24; Costs: £1,715k
A King's Student App was rapidly developed and deployed in time for the start of term and has proven successful with students. Working very closely with student user groups, we intend to develop the App to become the primary point of access to many services and for completing basic administrative tasks. Many of these are currently slow and manual and create barriers for students and the intention is to automate and migrate services. The App will also become the primary channel for targeted communications to groups of students and we will extend the use of the social functionality of the App to create stronger communities at different levels across King's.

Specialist Support
Anticipated timelines: Phased delivery 21-22 and 22-23; Costs: £416k
The aim is to give students a single-entry point into specialist support and advice services and to triage according to need. Students will only need to tell their story once as they move between services, and specialist services such as Counselling will be able to spend more time on higher-need cases. Waiting times will be reduced and processes such as Personal Assessment Arrangements will be streamlined for disabled students.

Personal Tutor Dashboard
Anticipated timelines: Initial go live May 2023; further phases 23-24 and 24-25; Costs: £930k
The Dashboard will provide personal tutors with the information needed for more effective interactions with students. We will be able to identify where meetings are not taking place and to intervene accordingly. We will add student engagement data and make this available to students themselves to support their progression.

Timetabling
Anticipated timelines: Phased delivery 22-23 and 23-24 Costs: £459k
The aim is to eliminate all but the genuinely unavoidable late changes from the timetable, through policy and process change and greater institutional oversight of compliance with deadlines and information provision. System enhancements and reporting will enable early identification of clashes and 'congestion' in student timetables. Students will receive an earlier and more stable timetable.

Student Enquiry Management
Anticipated timelines: Feb 2022-July 2023 Costs: £236k
A wide-reaching extension of existing functionality to simplify the routes for (inbound) student enquiry management, with an objective to create a single point of entry for all types of enquiry. This will make for reduced response times for students and higher satisfaction with the advice received, which can be more targeted. Students should feel better supported and more able to progress academically. Data on common areas of enquiry will be used to improve services and provide more proactive information through Student Services Online.

Assessment and Feedback
Anticipated timelines: Phased delivery 22-23 and 23-24; Costs: £545k

Implementation of an end-to-end e-assessment platform. Rollout of a stepped marking scheme to address transparency and consistency of grading and the introduction of faculty 'rubric champions' who will guide staff in developing their assessment strategies and criteria. Both will ensure all students are aware of standards expected prior to assessment and that feedback is clearly anchored to the published criteria. Programme level assessment mapping within all departments will ensure a culture of coherent and inclusive programme-level assessment design which is authentic, rigorous and aids student knowledge and skills building across levels of study. A team of assessment advisors within King's Academy will ensure that faculties deliver assessment improvements.

Student Voice
Anticipated timelines: Phased delivery 22-23 and 23-24; Costs: £161k
Capacity has been added in both KCL and KCLSU to develop an integrated approach to student voice and joint campaigns highlighting changes made in response to student feedback. This will align with an NSS Campaign centred on 'Have you heard?' and 'Have your say'. Co-design and representation mechanisms will be developed at faculty levels supplementing the success of the King's 100 forum 'and student feedback will be sought and acted on in relation to all these developmental initiatives.

Flexible Curriculum
Anticipated timelines: Phased delivery June 2021-October 2026; Costs: £1,084k
We will undertake pilot and preparation activities to introduce a King's First Year module and the foundation modules for the Flexible Curriculum, aiming for these to be a defined part of the undergraduate offer by 2025/26.

King's Edge
Anticipated timelines: October 22-August 2023; Costs: £804k
Building on successful piloting and innovation in the past two cycles, King's Edge will be developed and extended to become a single point of entry for a wider range of skills and development opportunities, internships and employability enhancement, by building an integrated IT platform, providing oversight and quality assurance and evaluation, and providing students with a simple mechanism to easily record and receive recognition of their learning.

Curriculum Management
Anticipated timelines: March 2022-January 2026; Costs: £1,050k
The current curriculum management process wastes significant amounts of time and leads to inaccuracies and gaps in the module and programme record. This differs from Faculty to Faculty with no standard approach to the oversight of all curriculum data. This leads to many downstream consequences for systems which rely on curriculum information such as Timetabling, Examinations, Fees etc and delivers a fragmented student experience. We will create a single source of truth for the curriculum, which is accurate, comprehensive and easy to use, to give greater control of the academic delivery model.

Data Governance
Anticipated timelines: Phased delivery 22-23 and 23-24; Costs: £497k
The aim is to develop and maintain a College-wide service that supports the governance, control and maintenance of data on University systems providing a "gold source" of data that is processed in a manner that meets the business needs of the University, our students and staff, and that is compliant with our statutory and reporting obligations. To achieve this, the aim is to ensure that the data sourced and gathered for use on student record management systems is:

- the data needed to meet all purposes for which it is collected and processed
- gathered at the outset of the student lifecycle rather than on multiple occasions during it
- automatically shared to downstream and dependant systems and processes to avoid duplication, manual workarounds and cleansing off systems.
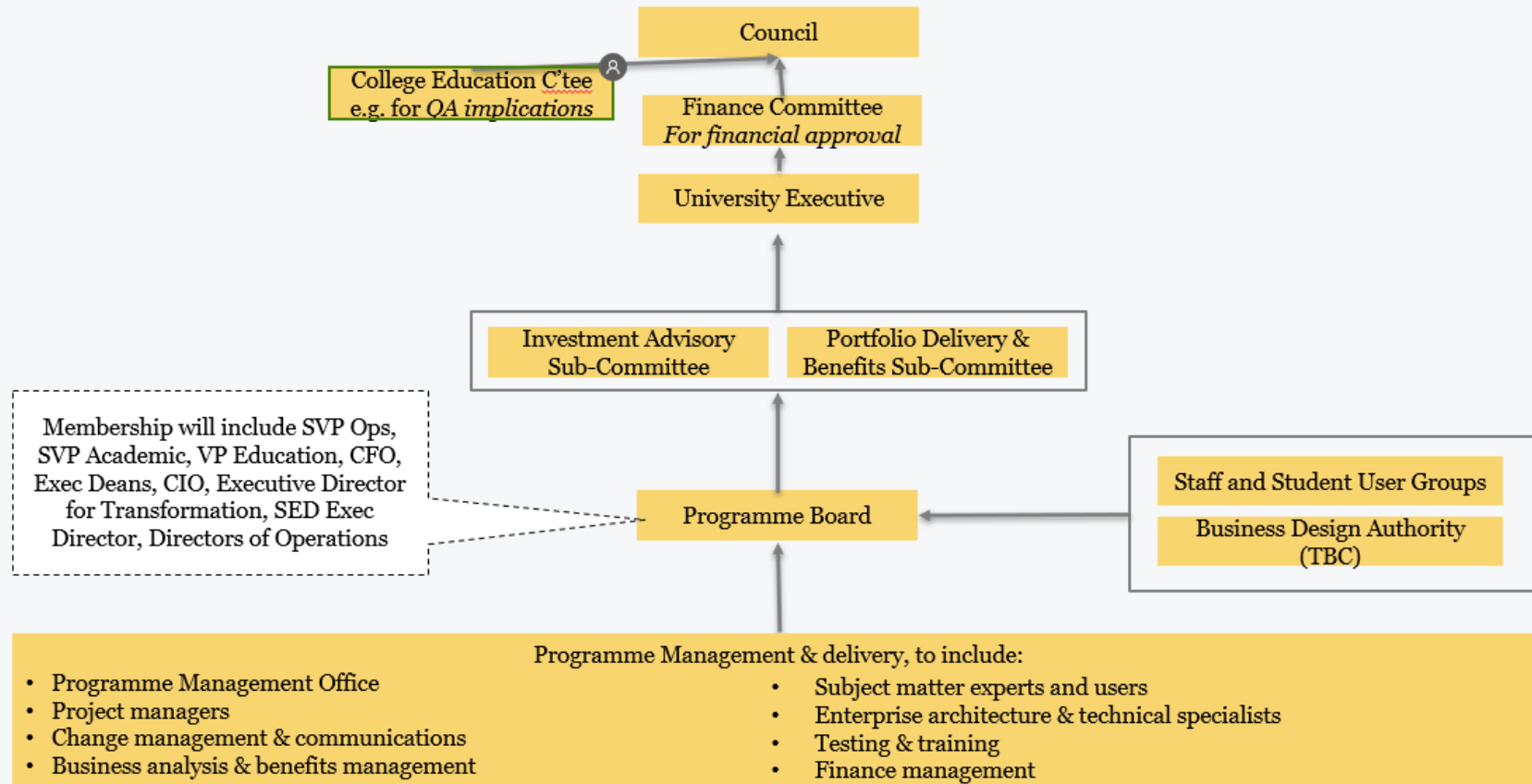
Council	
Meeting date	22 November 2022
Paper reference	KCC-22-11-22-06.1
Status	Final

Minor Ordinance Amendments

Action required

[X] For approval
[ ] To recommend for approval
[ ] For discussion
[ ] To note

Motion:

(i) That minor amendments be made to the composition of Council Committees reflecting changes in job titles and to the terms of reference of the College Education Committee.

(ii) That Ordinance B1 be amended to enable the College Secretary to make minor editorial amendments to the Ordinances, with such amendments being reported to the Governance & Nominations Committee.

Paper Explanation for Members

Why is this paper being presented?	The Ordinances require minor amendment to reflect changes in the senior team structure, officer titles and oversight of the College Teaching Fund.
What are the key points/issues	The current process for minor, editorial amendments is unduly onerous and time consuming.
What is required from members?	Approval of recommendations to Council for editorial changes to the Ordinances as currently required, and changes to the procedure for making amendments to the Ordinances such that minor editorial amendments can be made without reference to Council.

Paper Submitted by:

Xan Kite, Director of Governance

Irene Birrell, College Secretary

Minor Amendments to the Ordinances

The Changes Required

1. We need to update the job titles of the senior team and other officers where they appear in the composition of Council and committees within the terms of reference contained within the Ordinances. These constitute amendments to the Ordinances and under current rules require the full Ordinance change procedure: consideration by GNC, 14-days' notice of the proposed changes to be given to Council, Council consideration and approval. In addition oversight of the College Teaching Fund should be added.

2. It is proposed that, for the future, the College Secretary be granted the authority to make minor editorial amendments to the Ordinances such as these with a report being filed with the Governance & Nominations Committee. This will require an amendment to Ordinance B.1.

Detail of the Proposals

3. The Ordinance Appendices setting out the terms of reference for committees require amendment to reflect changes in the senior team structure and titles where those individuals are members, and some other minor editorial matters. The changes are:

   - removal of references to Senior Vice President (Service, People & Planning)
   - removal of references to Vice-President Communities and National Engagement to be replaced with Vice-President International, Engagement & Service
   - change Senior Vice President/Provost (Arts & Sciences) to Senior Vice President (Academic)
   - change Senior Vice-President/Provost (Health) to Senior Vice President (Health & Life Sciences)
   - remove references to Senior Vice President (Quality, Strategy & Innovation)
   - change of title of Executive Director of King's Education to Executive Director, Professional and Continuing Education
   - change title of Acting Director Operations (Central) to Director of Operations (Central)
   - change title of Director of Business Assurance to Deputy College Secretary & Chief Compliance Officer
   - add Chair of the Staff & Culture Strategy Committee to the membership of the Chairs' Committee

   Committees affected are:
   - Academic Board
   - Audit, Risk and Compliance Committee
   - Estates Strategy Committee
   - Finance Committee
   - Staff Culture and Strategy Committee

   In addition it is proposed that one new term of reference be added to the College Education Committee - "11- Receive reports on projects and spend as part of the College Teaching Fund" together with amendments to the officers included in the composition reflecting changes in responsible roles and titles. See Annex 1.

4. It is proposed that Ordinance **B1 - Procedures for the making of Ordinances – be amended as follows:**

   "Ordinances may be made, ratified, amended or revoked, as provided for under Statute 6 and Statute 7(o), at a quorate meeting of the Council provided that 14 days written notice of the proposal has been

given, and provided that two-thirds of those present (including a simple majority of Independent Members) vote in favour of the proposal (see Ordinance B9).

The College Secretary may make minor editorial amendments to the Ordinances without presentation to Council, with a report to the Governance & Nominations Committee."

Xan Kite, Director of Governance
Irene Birrell, College Secretary
7 November 2022

Ordinance **Appendix B: Terms of Reference of Council Standing Committees and Subcommittees**

College Education Committee, Committee of Academic Board

Terms of Reference

1.   **Authority**

The College Education Committee will provide strategic leadership of education for the College. It will ensure that the College's academic taught provision aligns with national expectations for quality and academic standards and enhances students' learning experience. The Committee will promote:
- risk-management approaches in relation to quality assurance, providing oversight of the quality and academic standards of students' learning opportunities and learning experience, advising Academic Board of any issues and areas of good practice
- enhancement in learning, teaching, and assessment
- an ethos of students as co-creators of the education experience

2.   **Duties**

On behalf of Academic Board, the College Education Committee will:

2.1   Monitor and review the implementation of the College's Education Strategy 2017 - 2022

2.2   Oversee the implementation of Faculty education strategies and the monitoring of performance indicators

2.3   Develop and maintain oversight of the College's strategies and policies relating to the full life-cycle of students' education (recruitment, retention, progression, and degree outcomes) and ensuring institutional compliance with external requirements

2.4   Monitor and report on the quality assurance and quality enhancement framework, taking into account both the internal and external context as they apply to taught education provision, including collaborative, flexible and distributed and distance learning provision

2.5   Maintain oversight of the programme and module approval, amendment and withdrawal procedures, and receive reports on proposals for new programmes and/or withdrawal of existing programmes (and short courses) from the Programme Development and Approval Sub-Committee

2.6   Promote enhancement in learning, teaching, assessment, and the student experience through the identification and dissemination of good practice

2.7   Have oversight of the quality of students' learning opportunities and learning experiences, advising Academic Board of any rising issues or areas of good practice

2.8   Have oversight and responsibility for the College's approach to the Teaching Excellence and Student Outcomes Framework (TEF) and monitoring the on-going conditions of registration with the Office for Students.

2.9		Receive reports from the Academic Standards Sub-Committee on the:
- monitoring and evaluation of processes to assure the Committee of the academic standards of taught programmes
- analysis of relevant performance indicators in relation to student performance and achievement

2.10		Receive regular reports from the following areas:
- Collaborative Provision Sub Committee (CPSC) – to provide updates on the conduct of the College's collaborative arrangements with partner institutions and for the strategic development of policies relating to collaborative provision
- Education & Students Transformation Board – to provide updates on the status of transformation projects and their impact
- King's Academy Advisory Board – to provide updates on the work and activities of the King's Academy
- King's College London Student Union (KCLSU) – to provide updates on the work and activities of the KCLSU Officers

2.11		Receive reports on projects and spend as part of the College Teaching Fund.

2.11 2.12	Champion inclusive education and monitor the equality and diversity dimensions of learning and teaching provision

2.12 2.13	Oversee Faculty governance structures for education, receiving regular reports from Faculty Education Committee on their areas of business and any issues that need to be raised at CEC

2.13 2.14	Receive annual overview reports of:
- UG/PGT external examiners reports
- Activities within the Education and Students Function
- Faculty Education Committee governance

2.14		In support of these duties, the Committee will:

2.14.1	form subcommittees, working groups and task and finish groups as needed, including:
- Academic Standards Sub-Committee
- Collaborative Provision Sub-Committee
- Programme Development and Approval Sub-Committee
2.14.2	review the relevance and value of its work on an annual basis
2.14.3	review its terms of reference on an annual basis.

3. Composition

3.1		The College Education Committee shall be appointed by Academic Board and shall comprise:
3.1.1	Vice President & Vice-Principal (Education & Student Success) (in the Chair)
3.1.2	One Faculty Member and one alternate per faculty.
3.1.3	One Member and one alternate from the King's School of Professional & Continuing Education (PACE)
3.1.4	Senior Vice President (Academic)
3.1.5	Vice President & Vice-Principal (Global International, Engagement & Service)

3.1.6   Vice President and Vice-Principal (Research)
3.1.7   Digital Education Academic Lead
3.1.8   Postgraduate Taught Lead
3.1.9   Associate Director, King's Academy
3.1.83.1.10   Academic Lead: Assessment & Feedback
3.1.93.1.11   Chair of the Academic Standards Sub-Committee (ASSC)
3.1.103.1.12   Chair of the Collaborative Provision Sub-Committee (CPSC)
3.1.113.1.13   Chair of the Programme Development and Approval Sub-Committee (PDASC)
3.1.123.1.14   Executive Director of Students and Education
3.1.133.1.15   Director, Library and Collections
3.1.143.1.16   Strategic Programmes Director, Education & Students Directorate
3.1.153.1.17   Strategic Directors, Education & Students Directorate
3.1.163.1.18   Associate Director, King's Academy
3.1.173.1.19   KCLSU President or nominee (for unreserved business only)
3.1.183.1.20   KCLSU Vice-Presidents for Education (for unreserved business only)
3.1.21   KCLSU Vice-President for Postgraduate (for unreserved business only)
3.1.193.1.22   KCLSU Representations & Campaigns Manager

3.2   There shall be a Deputy Chair, nominated by the Vice President and Vice-Principal (Education & Student Success) from amongst the members of the Committee

3.3   The following shall have the right to attend meetings of the Committee, but are not members of the Committee:
3.3.1   Associate Director, Academic Regulations and Policy Compliance(Strategic Programmes)
3.3.2   Associate Director, (Education Transformation)
3.3.33.1.1   Associate Director, King's Academy
3.3.43.3.3   Head of CTEL/Education Solutions
3.3.53.3.4   Executive Director, King's Online
3.3.5   Director of Brand and Marketing
3.3.6   Director of Sustainability
3.3.7   College Secretary
3.3.8   Head of IT Communications & Engagement/Communications & Engagement Manager – Corporate Communications
3.3.73.3.9   Dean of King's College London
3.3.8   Communications Business Partner
3.3.93.3.10   Two Three Associate Directors (Education) – one from the arts and sciences faculties, and one from the health faculties and One from PACE
3.3.103.3.11   Other officers of the College may also be permitted by the Chair to attend the College Education Committee either permanently or for particular meetings, along with those presenting papers to the Committee at specific meetings..

3.4   The College Secretary or his/her designate shall act as Secretary to the College Education Committee.

4.   Frequency of Meetings
The College Education Committee will meet at least six times in each year.

5.   Reporting Procedures
The College Education Committee will report to the Academic Board at least annually.

Meeting date	22 November 2022
Paper reference	KCC-22-11-22-07.1
Status	Final

Principal's report

Action required [tick ONE box]

☐ For approval
☐ To recommend for approval [use when a different Committee has approval authority]
☐ For discussion
☒ To note

Paper Explanation for Members

Why is this paper being presented?	Report from President & Principal highlighting current issues and events and developments since the last meeting of Council.
What are the key points/issues?	Cost of living; industrial action; enrolment; TEDI; Knowledge Exchange Framework; Courtauld Relationship; staff changes.
What is required from members?	To note

Paper History

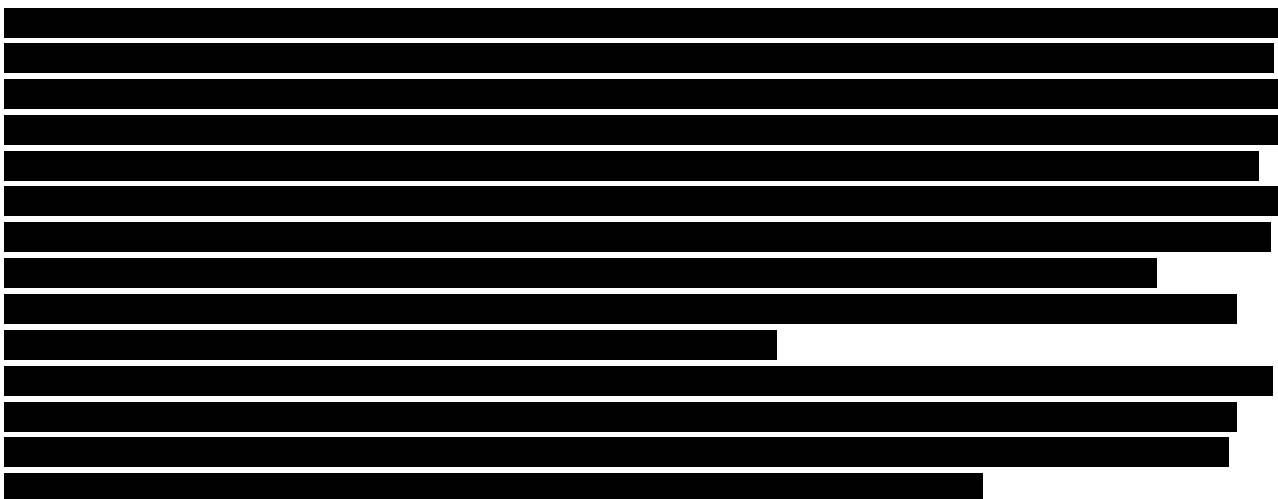| Action Taken [noted/recommended/discussed/approved]	By [Committee name]	Date of Meeting
n/a	n/a	n/a

Paper Submitted by:

President & Principal

Principal's report

Section A - Current topics

Enrolment

[REDACTED]

Knowledge Exchange Framework
King's has ranked amongst the top universities in the country for knowledge exchange in this year's Knowledge Exchange Framework (KEF) results. KEF is an annual assessment of higher education institutions (HEIs) on how well we transfer our 'knowledge' in terms of research, education, skills and facilities to benefit society and the economy. The assessment groups similar peer institutions into clusters, with King's being placed in Cluster V for very large, very high research intensive and broad discipline universities. KEF is split into 7 'perspectives' to capture the broad range of knowledge exchange activity that HEIs conduct and currently covers engagement with business, public and the third sector, public and community engagement, local growth and regeneration, IP and commercialisation, research partnerships with non-academic organisations, and skills and entrepreneurship. King's has achieved a 'Very high level of engagement' placing us in the top quintile for a total of 5 perspectives (Research partnerships, Working with the public and third sector, CPD and graduate startups, and IP & commercialisation).

Cost of living – support for staff and students
The senior team has been reviewing support for students and staff in light of the cost-of-living increases.
- Students – on top of existing support provision the senior team has approved an additional £3m to support students to be allocated across a number of areas including bursaries, hardship and food discounts. The details are being worked out in consultation with KCLSU and students.
- Staff –the national pay increase negotiated by UCEA and applied In August provides our staff with an increase of 3.1% to 9.0%, with higher numbers for those with lower salaries. In addition, King's also increased our London Weighting Allowance from £3,500 to £4,000 (the highest in the Russell Group) in August; and further made a one-off £1,000 payment to staff in July payroll dependent on service and FTE. All these elements put together mean that our colleagues at the lowest grades (Grade 1) will have received 13.2-15.6% increase as compared to the previous year, whereas those in higher grades (Grade 8) would have received 5.1-8.3%. Given the cost-of-living challenges imposed by inflation, what more we can do in terms of financial and non-financial support for the coming winter has been considered. The senior team has approved an Employee Welfare Loan scheme available to all staff to borrow interest free between £250 and £1000 payable back from salary from months 4-12. We are also reminding staff of our existing support through on campus food discounts, Employee Assistance Programme and Chaplaincy. We are waiting to see the outcome of any further pay negotiations at the national level via UCEA before deciding if we need to make an additional ex gratia payment.

Industrial Action update

There are three recognised trade unions which operate at King's for purposes of negotiation and consultation as may be appropriate. The unions are the UCU (predominantly academic and senior professional services), UNISON (predominantly professional services staff grades 1 – 8), UNITE (predominantly technical staff). UCU have two mandates for strike action and action-short-of strike on pay and pensions. UNISON have a mandate for strike action on pay but UNITE ballot did not meet the minimum response threshold. Pay and pensions matters are negotiated at a sector level which means that the disputes cannot be resolved locally. It is our intention to continue to communicate with the broader King's community on both pay and pensions whilst recognising it will not deter union members from taking action.

The Engineering & Design Institute London (TEDI)

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King's and Courtauld Relationship

The collaboration agreement between King's and the Courtauld was signed in December 2021. It signifies a landmark 10-year strategic relationship and shared vision for HE and the arts. 'Funmi Olonisakin has taken over Evelyn Welch's role as strategic lead, working closely with Debbie Swallow, Marit Rausing Director of the Courtauld. The innovative and sustainable partnership will compound our world-leading reputations and further interdisciplinarity.

The first 12 months has focused on cohesive working practices and governance. A Strategic Relationship Committee and a Joint Academic Committee have been stood up. It has also focused on the opening up of our estate and facilities to one another. The key beneficiary is our students, circa 600 Courtauld students and 300 King's BA Liberal Arts students. Courtauld students can also stay in King's residences and demand is expected to increase September 2023. In this way, shared communities and the opportunities presented have been embedded in the student experience from day one.

Priorities now include academic collaboration (UG and M-level). The ambition is sharing credit-bearing undergraduate modules from September 2023 and two joint MA courses from September 2024. An additional priority is exploring new opportunities in the public realm, e.g., pedestrianisation of the Strand. It is envisioned that the collaboration draws together cross-institution expertise to achieve educational, intellectual, and public benefits that would not be possible independently.

Staff changes

Professor Bashir Al-Hashimi has been appointed Vice President (Research & Innovation) and will succeed Professor Reza Razavi who will be stepping down after five years in the role. Currently Executive Dean of Faculty of Natural, Mathematical & Engineering Sciences (NMES), a position he has held since 2019, Bashir brings a wealth of experience, including a 30-year career across academia and industry and recognition as one of the world's most distinguished computer engineers. Recruitment for an Interim Executive Dean for the Faculty of Natural, Mathematical & Engineering Sciences will commence shortly.

Keith Zimmerman has been appointed to a new role as Executive Director of Transformation of Education and Student Outcomes. The transformation of the student experience is an essential next step in delivering student success at King's, one of our strategic goals set out in Strategy 2026. While we have made significant progress in our student success journey, there is still much more to do to meet the needs of our increasingly diverse student body. Keith joins us from the University of Bath, where he is Chief Operating Officer and brings a wealth of knowledge of the Higher Education sector and record of success for the outcomes he has achieved in transforming the student experience.

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Section B – Live Issues for Management
- Pay and Pensions Industrial Action
- Managing escalating utilities and inflationary costs
- Guy's Statue and King's History Project

Section C – President's External Visits/Meetings/Visitors
- 21st July 2022 – Minister Andrea Jenkyns visit involving tour of new King's Quad and discussion of sector issues including student mental health and admissions
- 27th July - Fellows Dinner
- 6th Sep – visit by Hetan Shah, CEO British Academy hosted by Arts & Humanities Faculty
- 7th Sep – Universities UK Annual Conference
- 13th Sep – Demo day for King's, UCL and Imperial students
- 21st Sep – Principal's dinner re Freedom of Speech Bill
- 22nd Sep – Russell Group Board meeting
- 27th Sep – Principal's Dinner re 10 years of Culture at King's
- 29th Sep – Policy Institute Freedom of Expression event
- 10th Oct – Principal's Dinner re Children and Young People's Mental Health
- 19th Oct – New Professors Installation Event
- 27th Oct – KHP Annual Conference
- 31st Oct – Shakespeare's Globe Partnership meeting
- 3rd Nov – Julia Gillard 10th Anniversary of Misogyny Speech event by Global institute for Women's Leadership

Section D - Major Media Stories

- To mark World Mental Health Day on 10 October, we announced our partnership with YouTube to connect viewers with mental health advice from experts, debunk myths and signpost ways to get support. YouTube is accessed by two billion users each month globally, with over 49 million in the UK alone. Viewers often turn to the channel for their health and wellbeing needs – be that information, community support or lifestyle advice. As part of tackling an internet populated with information overload and misinformation about mental health and wellbeing, YouTube has for the first time, collaborated with King's, South London and Maudsley NHS Foundation Trust and King's Health Partners to connect viewers with advice from experts, debunk myths and signpost ways to get support. The aim of the new video series 'Mind of the Matter' is to get to the truth about mental health direct from the experts, in one easy location.
- On the subject of mental health, a new study by the Institute of Psychiatry, Psychology & Neuroscience found that seeing or hearing birds is associated with an improvement in mental wellbeing that can last up to eight hours. The research achieved widespread coverage including The Times, the Guardian, the

Daily Mail and BBC Radio 4. It was also featured on BBC 2's Autumnwatch and shared on social media by author Margaret Atwood and Caroline Lucas MP.

- A number of our academics and researchers have featured heavily in the media over the last few weeks, providing their insight and analysis on UK politics and the economy. They have been quoted across the national and international media, including BBC News, Wall Street Journal, L'Opinion, NBC News, the Daily Telegraph, the Financial Times, The I and The Washington Post.

- Following the death of Her Majesty Queen Elizabeth II, academics from King's used their expertise to help share what this historic moment meant for the United Kingdom, the Commonwealth and the Monarchy itself. They were quoted in 616 pieces of media coverage, including 145 broadcast items.

- Research studies continued to attract widespread coverage in the national and international media, including a report on vaping, finding that it is substantially less harmful than smoking (covered in outlets including The Guardian, ITV News, BBC Radio 2, Bloomberg, Sky News and the Daily Mail); new data on student and public perceptions of free speech at universities (covered in outlets including The Daily Telegraph, the Guardian and the Daily Mail); and news of the King's and NHS cancer screening trial reaching 140,000 volunteer target, which made the front page of the Daily Mail and was also covered in The Times, Evening Standard and Sky News, among others.

Meeting date	22nd November 2022
Paper reference	KCC-22-11-22-08
Status	Final

KCLSU President's Report

Action required [tick ONE box]

☐ For approval
☐ To recommend for approval [use when a different Committee has approval authority]
☒ For discussion
☐ To note

Paper Explanation for Members

Why is this paper being presented?	Kings Council receives a report from the King's College London Students' Union (KCLSU) President at each of its meetings; this is the first report of the year.
What questions does it answer?	**Who are the KCLSU sabbatical officers 22/23?** **What are the KCLSU officers' key objectives for 22/23 of relevance to College Council business and members?** **What else should College Council know about KCLSU activities, campaigns, and student insights?**
What is required from members?	**Officers would appreciate support in connecting with stakeholders and groups relevant to our objectives for further discussion.**

Paper History

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

Paper Submitted by:

Mohd Yasir Khan, President, KCLSU

KCLSU President's Report

1. Introduction to KCLSU officers 2022/23

The new KCLSU officers for 2022/23 started in July. We are excited to be meeting new people across KCL, and are keen to start working with you all on making positive change for students. The table below includes a brief introduction to each officer and our priorities, as well as the best email address to use for contacting us.

	President – Mohd Yasir Khan president@kclsu.org I am an international student from India, reading International Relations in an undergraduate programme at King's. My priorities for the year include addressing the cost-of-living crisis and the re-introduction of alumni cards.
	VP Postgraduate – Shagun Bhandari vpp@kclsu.org I am a qualified lawyer in India and have recently graduated KCL with a Masters in Transnational Law. My priorities for the year are improving complaint mechanisms in cases of sexual harassment and ensuring information about support and opportunities is easily accessible for postgraduate students.
	VP Education (Arts & Sciences) – Sara Osman Saeed vpeas@kclsu.org I am a home student from London and studied English for three years. My main priorities for this year are transparency, reforming Mitigating Circumstances Forms and decolonising the curriculum.
	VP Education (Health) – Julia Kosowska vpeh@kclsu.org I am an MSci Neuroscience student, having completed my third year before taking this role. My main priorities are to improve assessment and feedback, timetabling, and transparency and communication with students.
	VP Activities & Development – Tejveer Nag vpad@kclsu.org I am an international student and have been studying Computer Science at King's for the past 3 years. My main priorities are to work with King's Careers and help improve the mental health and wellbeing services at KCL.
	VP Welfare & Community – Martina Chen vpwc@kclsu.org I am a community organiser from Italy, and I studied European Politics at King's. My priorities for the year are decolonising the university and inclusivity with a focus on trans inclusion and accessibility.

2. Officer objectives of interest to College Council

The below outlines Officer objectives for the year which have been further developed from commitments made in manifestos during the election period in March 2022.

2.1 **Cost of living (Yasir)** —I am co-leading All We Need, a student campaign for better financial support in response to the cost-of-living crisis. The campaign brings together students at King's to call on the government and university to put in place emergency measures and long-term structural changes to increase the financial resources available to students. In addition to representing the student voice in King's Cost of Living working group, the campaign will be participating in NUS's national campaign calling on government to introduce a national cost of living plan for students, including measures to increase maintenance loans in line with inflation, provide additional hardship funding, and cap energy bills and rent in student accommodation. Additionally, KCLSU also plans to further explore avenues of financial aid dedicated to support with specific necessities for international students, such as visa fees.

2.2 **Improving standards of student academic experience across KCL (Sara, Julia, and Shagun)** – Inconsistencies in student satisfaction across KCL are apparent through NSS scores, with clear areas of good practice as well as others where issues need to be addressed. Through a multitude of King's committees and the Teaching Excellence Framework, we are working to improve and aligning students' experiences of fundamental academic processes across all Faculties, such as communication with students about academic timetabling; clear guidance for and transparent decision-making about assessments and assessment results; and provision of timely and high-quality feedback.

2.3 **Mitigating circumstances (Sara)** – Across KCL there has been an increase in students applying for mitigating circumstances, which is also evident in the increased number of students seeking support with the process from the KCLSU Advice Service. While efforts can be made in inclusive assessment design to reduce the need for students to apply for mitigating circumstances, there is a further need to understand why students are applying and ensure that the process is accessible and culturally sensitive. As such, KCLSU would like to explore opportunities for student self-certification, as well as streamlined mechanisms to process recurring mitigating circumstances in recognition of the increase in applications in addition to wider work in partnership with KCL to improve support for students.

2.4 **Student support (Julia, Tejveer, and Shagun)** – While King's offers a variety of services to support students' wellbeing and development, many students still report difficulty in accessing the services they need. We aim to work with King's Student Mental Health and Wellbeing, Student Services, and management of the personal tutoring systems to make it easier for students to improving access to and availability of support such as counselling and hardship funding, where students are already experiencing adversities and delays can have a profound negative impact on their wellbeing and education.

2.5 **Decolonization Campaign Update (Sara and Martina)** - Our campaign Dismantle King's Colonial Legacy launched on 26th October. The event had a great turnout with speakers from Decolonize KCL, LGBTQ Network and Society, QTIPOC Society, the Intersectional Feminist Society, and the Anti Colonial Film Club. Students used their platform to speak on their views of King's Colonial Legacy and their perspectives on current institutional racism taking place at King's. The students who attended also took part in passionate discussions about what they expect from King's and signed our co-created open letter to King's. The project is ambitious, but we strongly feel that King's formally addressing its colonial legacy and its structural manifestation today is well overdue; and only then can King's validly call itself a global and inclusive institution for students.

2.6 **Trans Inclusion (Martina)** – With an increase in anti-trans narratives and discourse, KCLSU recognizes that trans students are experiencing daily hardship and harm. Subsequently, trans inclusion is a priority for the academic year ahead. One avenue in improving trans inclusion and support in continuous work with the KCL EDI team. However, the sabbatical officer team 22/23 want to further explore opportunities to streamline and simplify name-change procedures at KCL. Furthermore, following the work of University College London and the University of Kent, we hope to explore the development of a Gender Affirmation Fund.

3. KCLSU organisational updates

3.1 **TEF student submission** – KCLSU is currently working to complete the TEF student submission. This project is being led by KCLSU's VP Education (Health), Julia Kosowska, who is the TEF Student Contact. At this stage, the initial evidence-gathering is complete and the student executive panel with representatives from each of KCL's faculties to oversee the submission has been established. Although the student submission is independent and as such, we are not required to report to KCL, we have been meeting regularly with the KCL TEF project team and appreciate the positive, collaborative working relationship moving forward with the submission.

3.2 **Student campaigns** – In addition to the broader cost of living campaign mentioned previously, King's Doctoral Students' Association (KDSA) are leading a campaign to address the cost of living for postgraduate research (PGR) students. They have already met with Vice President (Research) Prof Reza Razavi and Senior Vice President (Academic) Prof Mike Curtis to address the PGR stipend level, following which KCL agreed to increase the minimum stipend for students funded directly by King's in line with the 10% increase announced by UKRI; this affects around 36% of PGRs. KDSA continue to campaign on securing a one-off payment for all PGRs and fair pay for non-GTAs who undertake teaching work, to address the broader issues of cost of living and working conditions for all PGRs.

3.3 **KCLSU Advice Service update –** The KCLSU Advice Service provides free, confidential, and impartial academic advice to students with issues affecting their studies. 2021/22 saw a 30% increase in Advice cases from the previous academic year, while so far in 2022/23 there has been a 49% increase in cases for August and a 52% increase in cases for September compared with 2021/22. A table showing case numbers for these periods, divided by type, is included below. Following investment into restructuring the Advice team, this year we are hoping to focus on improving the following key policy issues we have identified from trends in Advice cases: Fitness to Study or Support to Study processes; academic misconduct; and the experiences of Nursing students, especially on placement. We are also tracking the impact of the cost of living on students using the Advice Service, and feeding recommendations based on students' experiences into the relevant KCLSU campaigns.

Category	2021/22	Aug-22	Sep-22
Academic Appeal	779	75	220
Academic Misconduct	225	15	12
B2 Suspension	3	0	0
Changing or Leaving Course	23	1	4
Complaints	322	14	24
Fitness to Practice	37	5	6
Fitness to Study	7	1	0
Interruption of Studies	23	3	3
Mitigating Circumstances	487	48	14
Non Academic Misconduct	47	1	0
Other	64	4	16
PGR	16	4	5
Total case numbers	**2033**	**171**	**304**

Mohd Yasir Khan
President, King's College London Students' Union (KCLSU)
02/11/2022

King's College Council		
Meeting date	22 November 2022	
Paper reference	KCC-22-11-22-09.1	
Status	Final	

Report of the Finance Committee (FC)

Contents	Meeting at which considered	Consent agenda	Council action
1. Financial Statements Year Ended 31 July 2022 and Auditor's Management Letter **[Annex 1]**	14 November 2022	No	Approve
2. Five-Year Forward Plan **[Annex 2]**	14 November 2022	No	Approve
3. Investment Annual Report	14 November 2022	Yes	Note
4. Chief Finance Officer Report	14 November 2022	Yes	Note

For Approval

1. **Financial Statements Year Ended 31 July 2022 and Auditor's Management Letter**

   Motion: **That the consolidated financial statements be approved and signed and that the going concern assumption be adopted.**

   The university will be reporting a large deficit for 2021-22 in the financial statements, however this is after a £283.8m cost for an increase in the USS pension provision upon completion of the March 2020 valuation. **See Annex 1.**

	2021-22 (£'m)	2020-21 (£'m)
Surplus before other gains and losses	(247.4)	36.4
Surplus before other gains and losses, and excluding movement on the USS pension provision	42.2	40.3
EBITDA	118.7	115.0
Net cash inflow from operating activities	135.8	120.9
Change in cash and cash equivalents	1.5	170.2

   The financial statements presented are substantially complete, with no expectation of material changes to results or disclosures. No material unadjusted misstatements have been identified by KPMG at this time from their audit.

   An adjustment of £20m between accruals and fixed assets has been made following discussion with KPMG (this adjustment has had no impact on surplus).

   The going concern assumption has been adopted in the preparation of the financial statements, Council as the university's governing body are responsible for ensuring the going concern assumption is reasonable. The paper presented the work performed by management in justifying this assumption, and Finance Committee in conjunction with the Audit, Risk & Compliance Committee recommends to Council adoption of the going concern assumption.

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The Committee also asked how the 6% margin target would be reached in this inflationary period and how King's planned to continually absorb the shocks that would likely continue to occur given the geopolitical and macro-economic environment.   While management noted that there were pockets of contingency across the institution, the Committee asked that this be provided in 'storybooked' form for a future meeting so that it was easy to understand the subtlety of the planning against hard numbers.

The Committee also noted that the standing 6% margin target might not be sufficient for current aspirations and asked that the implications in terms of ability to reach different levels of high global ranking be set out in due course by the President & Principal.

A further future decision for Council which would be considered by Finance Committee and Estates Strategy Committee would be selecting from options for the Champion Hill building. Estates Strategy Committee had had preliminary discussions about owning/leasing and other options with partners and clarity on those that would be available would come by April 2023. The Finance Committee noted that it should not be assumed that residences must be provided at Denmark Hill given the material sums of money involved.

2.   **Five-Year Forward Plan – November 2022**

Motion: That the five-year forecast to the Office for Students (OfS) be approved and that authority be delegated to the Chair of Council and Principal for the final sign off and submission to the OfS in the prescribed format in January 2022.

This forecast is based upon extensive work undertaken during the Strategy 2026 and Size & Shape 2.0 workstreams within and across the College. This set of OfS forecasts have been the most thoroughly contributed to and consulted on at King's in recent history. The majority of this work has been overseen and influenced by academic leadership, bringing confidence in the commitment to delivering the changes it describes.

The figures and underlying logic reflect a more proactive positioning of the College, a clear link to strategy and a considered investment aspiration. The work to deliver this will be planned in detail through a revised integrated planning process that commences in November. **See Annex 2**.

The paper was the penultimate version of the submission required by OfS annually to include the five-year plan, size and shape, and margin growth. The time scale includes one year beyond Strategy 2026 and takes us to 7% margin. It had to assume large sums of inflation, recognise cost of living, capital aspirations and improving surplus in the period and that some investments will be revenue based.

The Committee noted that the levers were given in terms of external impact and asked for information about worst case scenarios and sensitivity to inflation to meet the £102m payment for Bush House. The Vice-President (Finance) noted that inflation would mean that less could be achieved but the bigger projects already underway had increased contingencies included and would continue to move forward. She explained that a master planning exercise for the campuses was underway and that not all investment would or should go into Bush House.

The Committee noted that the agreed minimum of 90 days and an average of 100 days cash to be held appeared to have been reduced in the papers. The Vice-President (Finance) said that this would

be reviewed.

A member suggested that the next iteration of this report include a narrative with respect to worst case scenarios and mitigations that might be applied if they came to fruition.

For Note

3. **Investment Annual Report**

   The Chair of the Investment Subcommittee reviewed the report which summarised investment activity for the twelve months ended 31 July 2022. He noted that the College was now fully divested from fossil fuels as had been committed to some years ago. This had impact on current outcomes given the high level of performance of those firms in the present circumstances.

4. **Chief Finance Officer (CFO) Report**

   The Committee noted a report from the CFO which provided a general summary of activities:

   (i)   Summary of financial risks
   (ii)   Government Autumn spending review summary
   (iii)   Management Accounts
   (iv)   Items for report/ approval:
   - Fees 2022 to note
   - Staff loans
   - Severance payments
   - Bad debt write-off
   (v)   Current financial position
   (vi)   Endowments and investments
   (vii)   Debt agreement amendments
   (viii) Pensions
   (ix)   Tax strategy and 2020 review
   (x)   Schedule of Insurances

Michael D-Souza
Treasurer and Chair of Finance Committee
November 2022

See published Financial Statements

These pages have been redacted

King's College Council		
Meeting date	22 November 2022	
Paper reference	KCC-22-11-22-09.2	
Status	Final	
Access	Members and senior executives	
FOI release	Following Council meeting	

Report of the Audit, Risk and Compliance Committee

Contents	Meeting at which considered	Consent agenda	Council action
1. External audit report and Financial Statements (**Annexes 1 & 2**)	08 November 2022	No	Approve
2. Annual statement regarding the Prevent duty (**Annex 3**)	08 November 2022	Yes	Approve
3. Annual Research Integrity Statement (**Annex 4**)	08 November 2022	Yes	Approve
4. Annual Report of the Audit, Risk and Compliance Committee (**Annex 5**)	08 November 2022	No	Note
5. Annual Report of the Director of Business Assurance (**Annex 6**)	08 November 2022	Yes	Note
6. Portfolio Risk Management (**Annex 7**)	08 November 2022	No	Note
7. Internal Assurance update	08 November 2022	Yes	Note
8. Enterprise Risk Management update	08 November 2022	Yes	Note
9. Risk presentations and discussions: Operational Risk (**Annex 8**) Risks to the Education Strategy (**Annex 9**)	08 November 2022	Yes	Note

For approval

1.   External audit report and Financial Statements

Recommended: That the Council approve the External Auditors' Report for the year ended 31 July 2022 and the letter of management representation from the university to the external auditors.

Much work was 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 with Finance staff, which had been recorded for others to view later. The Chair and Independent Member Mr Waseem Malik also met in the week prior to the ARCC committee meeting with Ms Fleur Nieboer and Mr Ben Lazarus from KPMG to go through the accounts and their management letter in close detail. 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 in the ISA260 at the end of November.

A summary of the auditors' comments is provided in the annual report of the ARCC (section 5, page 6) in Annex 5 to this report.

KPMG audit report and management letter – See **Annex 1.**

Letter of Management Representation to KPMG –See **Annex 2.**

2.   Annual statement regarding the Prevent Duty

Recommended: That the Council approve the Annual Prevent Statement for the year ended 31 July 2022.

Members of the ARCC considered the Annual Prevent Report and accompanying statutory Statement which had been prepared by the Academic Regulation, Policy and Compliance team in the Students and Education

Directorate. It is a requirement of the OfS that the statement on the management of the Prevent duty should be submitted by the university as part of its Annual Accountability Return. Members of the ARCC recommended the Annual Prevent Statement to the Council for final approval.

Annual Prevent Statement – See **Annex 3.**

3.   Annual Research Integrity Statement

Recommended: That the Council approve the Annual Research Integrity Statement for the year ended 31 July 2022.

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. The ARCC has considered this statement and recommends it to the College Council for final approval.

Annual Research Integrity Statement – See **Annex 4.**

For note

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

As a point of good practice in corporate governance, the Audit, Risk and Compliance Committee has prepared a report, reviewing its work in the 2021-22 year. The report includes a commentary on the Committee's management and engagement with the College. It specifically reviews work done in the Committee in relation to assuring the College's strengthening cyber-security posture and to embedding high quality risk management approaches within the College. It 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 the interaction of the Committee with both the internal and external auditors, and its consideration of compliance matters. Overall, the report concludes that the College's arrangement for control and governance, securing value for money, and for producing high quality data for reporting to key public bodies were all adequate and effective.

Members of the Audit, Risk and Compliance Committee reviewed their annual report at this meeting and approved it for submission to the Council and to the accountable officer.

Annual Report of the Audit, Risk and Compliance Committee – See **Annex 5.**

5.   Annual Report of the Department of Business Assurance

To help support the members of the ARCC in providing their opinion on the overall system of control, governance, achievement of value for money, and management of data quality, the Department of Business Assurance has produced an annual report reviewing its work for the year. In summary, the report concludes that internal controls are generally considered to be adequate and effective, and where issues have been raised, management has been willing to engage and consider improvements. There is evidence to support the conclusion that value for money is sought in the management of various functions and activities and that, overall, the College has an adequate and effective approach to achieving value for money. Governance arrangements are also considered to be adequate and effective. In terms of risk management, the report concluded that the Executive is aware of the need to manage risk effectively and the College is currently engaged in an appropriate improvement programme which will support the cultivation of an effective risk management culture within the organisation. It was noted

that the Business Assurance team have a twice-yearly invitation to the Principal's Senior Team to report on outstanding overdue audit recommendations and the trend over the last year has been for fewer recommendations to have remained open for an extended period. Currently, all outstanding recommendations have a plan to ensure closure, which includes a credible revised target date for completion.

Annual Report of the Director of Business Assurance – See **Annex 6.**

6.   **Portfolio Risk Management**

The Director of Portfolio reported to the ARCC that a number of changes had been made to project and programme management as a result of the recommendations made in a Business Assurance report produced two years ago at the request of the Chair of ARCC. Her role had been created as a consequence and the review findings and a number of other recommendations had been taken into account in setting up what is now known as the Programme Governance Arrangements (PGA) at the College. Key changes had been made to the way investment decisions were made and then to how projects and programmes were overseen. There are a lot of projects across the College at any one time and the PGA provides a way of consolidating information which exists across individual portfolios, like Estates, IT, SED, RMID, HR, SPA and the faculties. Although the process has been somewhat manual, it has resulted in all the information being put into one place. It was noted that not all of the data was currently consistent and, therefore, the information provided in the pack should be treated with some care, but it does help to give an idea of the size and scale of the work which is currently underway, and its progress status. In the case of the big projects, which are being called the "PGA Majors", the data can be considered with a greater degree of confidence. The ARCC will be taking this as a regular report at its meetings, so that continuous assurance can be sought on the College's progress with its various projects. ARCC is keen to see a report on major projects being presented termly to Council, so that it can also have a clear view on the status of projects across the College and to what extent the £400million strategic pool has been committed. The report of the Director of Portfolio, which includes a snapshot status report, is appended in Annex 7. The reporting format will be developed and refined over time.

Portfolio snapshots and insights report – see **Annex 7**.

7.   **Internal Assurance update**

The Interim Assistant Director of Business Assurance (Audit) noted that eleven internal assurance reviews had taken place since the last meeting of the ARCC. No significant concerns had been raised in the audits, although there was a recurring theme of single person dependencies for processes which were currently working well. The College was considered to be carrying a risk in several areas that loss of that person would lead to a failure, or at least a reduction in the optimisation, of the process. The ARCC checked with the Business Assurance team that it had sufficient resources to provide an effective internal assurance service, and both the Interim Assistant Director of Business Assurance (Audit) and the Deputy College Secretary confirmed that they were comfortable with the current resourcing arrangements. The Deputy College Secretary added that a process would be undertaken in the new year to convert the posts in the team which are currently interim, seconded or contracted into permanent roles, and two specialist assurance roles, which had previously been rejected in two business planning rounds, would be created by reassigning existing salary budget within the team.

8.   **Enterprise Risk Management update**

The Senior Vice-President (Operations) reported that the College had been taking its time to get the framework for risk management right. He believed that the framework was now in a good place, recognising tiers of high-level strategic risk (also variously referred to as enterprise risk or corporate risk), with layers below of operational risk and project risk. The Director of Strategy, Planning & Analytics described the work which had been going on to further develop the framework. She noted that the strategic risks were largely external or existential, whereas the operational risks were more internal and, therefore, offered a greater scope to choose to accept or eliminate. Work has been done to clarify risk ownership, the rhythm of the completion of risk assessments and registers and the appropriate cycle for management review.

Taken with the reports on Operational Risk Management and Portfolio Risk Management, the members of ARCC noted that they were comfortable with the present work going on to embed risk management in the College but noted that this involved a significant cultural shift and that work to fully embed the discipline would be going on for some time.

9.   Risk presentations and discussion

Members of ARCC received presentations on the management of operational risk and risks to the successful delivery of the Education Strategy.

In terms of the management of operational risk, the ARCC was satisfied to note that the different layers and aspect of risk were now being evaluated and managed alongside each other, which gave a much clearer sense of the escalation route for risks and the holistic nature of the treatment of risk at the College.

With regards to the risks to the successful delivery of the Education Strategy, members noted that the key risks currently identified by management were those associated with industrial action, the Teaching Excellence Framework (TEF) and the diversification of the overseas undergraduate intake.

Operational Risk Management (***minute***) – See **Annex 8.**

Risks to the Education Strategy (***minute***) – See **Annex 9.**

Year end report 2021/22 - DRAFT

Kings College London

15 November 2022

Key contacts

Your key contacts in connection with this report are:

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King's College London

Introduction

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

We are pleased to have the opportunity to update you in writing on 15 November on the results of our audit of the consolidated financial statements of King's College London (the 'College') and its subsidiaries (the 'Group'), as at and for the year ended 31 July 2022.

We are providing this report in advance of our meeting to enable you to consider our findings and hence enhance the quality of your discussions. This report should be read in conjunction with our audit plan and strategy report, presented on 07 June 2022. We will be pleased to elaborate on the matters covered in this report.

Our audit is well progressed and on track. The areas of ongoing audit work are detailed on page 4 of this report and are now just standard completion items. There have been two changes to our audit plan since June. Firstly, we have rebutted the significant fraud risk over tuition fee income courses spanning the year end due to the immaterial value of this balance. As is common, we have also reassessed materiality based on actual (rather than estimated) benchmarks. There has been no change to materiality methodology or percentage, but the subsidiary absolute materiality values have been updated accordingly.

Subject to Council's approval, we expect to be in a position to sign our audit opinion on the Group's financial statements in late November as timetabled, provided that the outstanding matters noted on page 4 of this report are satisfactorily resolved.

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; and

— Limitations on work performed;

— Restrictions on distribution of this report.

Yours sincerely,

Fleur Nieboer

15 November 2022

How we have delivered 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 controls; and

— All of our related activities are undertaken in an environment of the utmost level of objectivity, independence, ethics and integrity.

King's College London

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.

This report has been prepared for the Audit, Risk and Compliance Committee, in order to communicate matters of interest 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.

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 'College') 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 2022.

This report summarises the key issues identified during our audit but does not repeat matters we have previously communicated to you.

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 College and the Companies Act.

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

We have the following final items to complete, which are standard at this point in the timetable:

— Small volume of other lower risk audit procedures; and

— Closedown of usual completion items, including going concern procedures and final checks over the Annual Report and Accounts.

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.

King's College London
Our audit findings

Significant risks		Page 7-17
Significant audit risks	**Risk change**	**Our findings**
Revenue recognition	▼ Decrease	The results of our testing to date have been satisfactory.
Management override of controls	● No change	No misstatements identified.
Valuation of land	● No change	We consider the valuation of land to be materially appropriate.
Valuation of USS pension scheme liability	● No change	The valuation of the USS pension scheme liability is slightly optimistic, but well within our acceptable range.
Key accounting estimates		Page 18
USS provision	Optimistic	We involved KPMG actuarial specialists in reviewing the actuarial assumptions. Assumptions were found to be slightly optimistic but well within our acceptable range.
Valuation of land	Neutral	We assessed the assumptions underpinning the year end valuation. Assumptions were found to be balanced.

Uncorrected audit misstatements   Page 28

We note an immaterial difference between the land valuation on the balance sheet and the valuer's report, but continue to be satisfied this is a materially appropriate estimate.

Number of control deficiencies   Pages 26-28

Significant control deficiencies	0
Other control deficiencies	1
Prior year control deficiencies remediated / partially remediated	1

Other matters   Page 22

Use of Funds

We have not identified any matters that would require us to modify our opinion in respect of use of funds.

King's College London

Key changes to our audit plan

We have not made any changes to our audit plan as communicated to you on 7 June 2022, other than as follows:

Risk/change	Effect on audit plan
Rebuttal of fraud risk related to recognition of tuition fee income	– In our audit plan communicated to you on 7 June we identified a risk of fraud related to the recognition of revenue in the financial year associated with tuition fee income relating to courses that run across the year end. – We have reassessed this risk through our final audit procedures and have identified that the value of such courses is well below our materiality level. As such we do not consider there to be a material risk relating to this balance. – As a result we have rebutted our significant risk in relation to tuition fee income from courses spanning the year end.
Materiality	– Across the subsidiaries, we have reassessed materiality values based on actual (rather than estimated) year end benchmarks. This has led to small changes in our absolute materiality values for the subsidiaries only (the group and College materiality values have stayed the same). We note no changes to our materiality methodology or percentages used. The updated subsidiary materiality values are detailed on page 21.

King's College London
Significant risks and other audit risks

Significant audit risks

1	Revenue recognition – fraud risk related to revenue recognition
2	Management override of control
3	Valuation of land
4	Valuation of USS Pension Scheme liability

Other audit risks

5	Access and participation expenditure
6	Valuation of buildings
7	Going concern
8	Estimates and judgments over other material provisions and accruals

King's College London
Significant risks and other audit risks

1   **Revenue recognition**   Fraud risk related to misstatement of revenues

<table>
<tr><td>

Significant audit risk

Research grants and contracts income

- *Does not exist;*
- *Are not completely recorded in accordance with the SORP; or*
- *Are not accurately recorded under the performance model.*

• The College 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, including apportioned overhead costs. We consider there to be a significant risk of fraud and error in the recognition of research revenue largely due to inappropriate apportionment of overhead costs. The University also receives a number of non standard grants which do not have any performance conditions and therefore there is a significant risk that income may be inappropriately recognised.

• 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 College's accounting policies or relevant accounting standards. Non compliance with grant terms and conditions may also result in claw back of funding by research funders.

</td><td>

Our response

— We considered the control framework in place to monitor the research projects ledger, including the approval to set up new projects, review of research expenditure and confirmation that overhead rates are apportioned in accordance with the contract terms.

— We reviewed research activity by funder (on a sample basis) 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 HE SORP. This procedure covers risks around existence and accuracy.

— We critically assessed research project data to identify projects with income, expenditure, debtors or creditors meeting certain criteria during the year. For projects identified outside our expectations we confirmed that the accounting treatment was appropriate by reference to grant agreements and other supporting documentation. This procedure covers risks around existence, completeness and accuracy.

— For a sample of research projects we tested whether expenditure was 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. This procedure covers risks around existence, completeness and accuracy.

— We performed substantive audit procedures over accrued and deferred income related to research grants and contracts, considering whether the calculation and appropriateness of deferred and accrued elements were accurate and complete.

Our findings

We have not identified any issues in this testing.

</td></tr>
</table>

King's College London

Significant risks and other audit risks

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1   **Revenue recognition**   Fraud risk related to misstatement of revenues

---

Significant audit risk - rebutted

Tuition fee income

We rebutted the risk of fraud relating to tuition fee income which is generally based on standard fee rates, and since our audit plan have rebutted the fraud risk in relation to courses which span the year-end.

There is a risk of error associated with tuition fee income in regards to flexible provision (for example online / distance learning courses) and courses that run across the year end where it may be possible to manipulate the income recorded in the financial year. However, the risk is deemed to be immaterial.

Within tuition fee income there are also some research studentship and support grants. The balance is not material and is made up of high volume, small value transactions, and therefor we do not consider there to be a significant risk over the recognition of the RTSG grant income.

Our response

— We tested the design and implementation of controls over student data including the student record system, master fee data and reconciliations between student and finance systems.

— We reviewed the completeness of fee income through reconciliations between the finance system, the student record system and cash received from the Student Loans Company, and assessed the appropriateness of bursary/scholarship and fee waiver recognition through review of relevant schemes and policies.

— We reviewed the listing of transactions for programmes which crossed the year end. We compared the courses spanning the year-end to those from previous years to confirm whether the listing was complete.

— We performed substantive audit procedures over tuition fee income to agree amounts recorded to cash received and confirmed that income received for sampled items (from both across the year and from courses spanning the year end) had been accounted for in the correct period.

Our findings

Our work on this risk is complete with no issues identified.

King's College London

Significant risks and other audit risks

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

---

Significant audit risk

The 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

We performed the following procedures:

— In line with our methodology, we tested the operating effectiveness of controls over journal entries and post closing adjustments.

— We assessed the controls in place for the approval of manual journals posted to the general ledger to ensure that they were appropriate.

— We analysed all journals through the year and focused our testing on those with a higher risk, such as journals impacting revenue recognition. We have substantively tested 69 journals which met our high risk criteria.

— We assessed the appropriateness of changed compared to the prior year to the methods and underlying assumptions used to prepared accounting estimates.

— We reviewed the appropriateness of the accounting for significant transactions that are outside the College's normal course of business, or are otherwise unusual.

— We assessed the controls in place for the identification of related party relationships and tested the completeness of the related parties identified. We verified that these have been appropriately disclosed within the financial statements.

Our findings

Our work over this risk is substantially complete, although we do run certain procedures right up to the date of sign off. We have not identified any management override of controls through our work to date.

King's College London

Significant risks and other audit risks

Cautious   Neutral   Optimistic
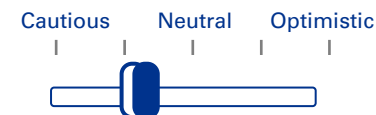
| 3 | **Valuation of land** | Risk of error over the valuation of land |

Significant audit risk

The College undertakes a revaluation of land for inclusion in the financial statements under FRS 102.

Valuation of land is an area of increased judgement and estimation, as well as a highly material value, and therefore we continue to classify the valuation of land as a significant risk.

Our response

- We critically assessed the competence, capability, objectivity and independence of the College external valuer and considered the terms of engagement of, and instructions issued to, the valuer for consistency with the requirements of FRS 102.

- We read and evaluated the instructions issued by management to the external valuer and the review and challenge by management on the draft outputs.

- We utilised our internal specialist approved valuation audit programme to assess the methodology used to prepare the valuation, including the choice of indices used to determine the valuation

- We considered and critically assessed any changes to the College's estate, including the acquisition of Bush House South West Wing in late July 2022.

- We critically assessed and reviewed the values and disclosures included in the financial statements relation to the valuation of land, and the accounting treatment of those values.

Our findings

Our procedures over the valuation of land are complete with no material or significant issues identified.

We do note that the estimated value of land in the expert valuer's report is c£5m higher than included on the balance sheet. Hence management's land valuation estimate is deemed slightly cautious, but this is not deemed a material difference.

King's College London

Significant risks and other audit risks

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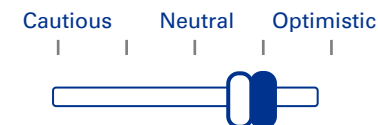
4 **Valuation of USS pension liability**   Risk of error in relation to the valuation of post retirement benefit obligations

---

Significant audit risk

The College participates in the Universities Superannuation Scheme (USS). While this is accounted for as a defined contribution scheme a provision is required to be held for the College's obligation to fund deficit payments.

The USS pension liability at 31 July 2022 was £405 million (£121 million in as at 31 July 2021). This liability reflects the impact of the 2020 scheme valuation, which has resulted in a significant increase in pension liabilities across the sector . (SAUL and NHSPS are shown as nil on the College's balance sheet due to the nature of the schemes).

Our response

We performed the following procedures:

— Reviewed the model developed to support the University in calculating the provision to be recognised to confirm that it contains an appropriate methodology to calculate an accurate provision;

— Verified that the model has been appropriately completed by the University in preparing the calculation of the provision;

— Reviewed the actuarial assumptions for the USS Pension Scheme deficit recovery plan using KPMG actuaries and considered the reasonableness of them and their sensitivity to changes in those assumptions;

— Agreed the accounts disclosures to supporting documentation and verified that all required disclosures have been included within the accounts;

— Considered the adequacy of the University's disclosures in respect of the sensitivity of the deficit to the assumptions used; and

— Reviewed the accounts to ensure appropriate disclosure and review the accounting treatment for annual pension charges though the Statement of Comprehensive Income.

Our findings

Our procedures over the valuation of the USS pension liability are complete with no material or significant issues identified.

King's College London

Significant risks and other audit risks

| **5** | **Access and participation expenditure** | **Risk relating to disclosures for access and participation expenditure** |

Other audit risk

Office for Students (OfS) registered providers were required to prepare an access and participation plan as part of their registration conditions with the OfS.

Plans include a plan of how much will be invested by the provider in widening participation activities.

Access and participation expenditure is required to be analysed in four categories: access investment; financial support provided to students; support for disabled students; and research and evaluation.

From 2019/20 onwards providers have been required to include a note to the accounts to set out the level of investment that has been made in widening participation activities.

We are required, as part of our audit opinion, to report if there is a material misstatement identified as a result of our audit of the access and participation expenditure note.

Our response

— We have determined how the College has identified the expenditure that has been incurred in delivering the access and participation plan during the year.

— We have critically assessed the methodology in place for analysis expenditure between the categories of access and participation expenditure and confirm that the approach is consistent

— We tested a sample of expenditure items in order to assess whether they correctly relate to expenditure on access and participation.

— We verified that required disclosures as set out within the Account Direction have been accurately made.

Our findings

We have not identified any issues from these procedures.

King's College London
Significant risks and other audit risks

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6   **Valuation of buildings**   **Risk of error over the valuation of buildings using a cost methodology**

Other audit risks

The College has a significant capital programme both to improve the quality of the estate and also relating to expansion.

Due to the size and nature of capital additions (£54.115m in 2020/21 and £165.702m in 21/22) including buildings where remediation works have been undertaken, we have included the valuation of buildings as an other audit risk for 2021/22. We note that the acquisition of Bush House South West Wing (with buildings value of c£45m) completed in late July 2022 and is therefore incorporated into the 2021/22 accounts.

Our response

We have:

- Reviewed impairments, including management's own impairment review, and the need for any revisions to useful economic lives or accelerated depreciation;

- Inspected a sample of property, plant and equipment from the fixed asset register to confirm existence;

- Confirmed ownership of buildings through agreement to title deeds;

- Critically assessed the accuracy of capital additions (including assets under construction) on a sample basis, including the acquisition of Bush House South West Wing. As part of this we considered whether the approach to capitalisation is reasonable, including the treatment of any major refurbishments;

- Reviewed additions to Property, Plant and Equipment, focusing on property additions to ensure the level of costs capitalised is fairly stated;

- Calculated an expectation of depreciation and assessed the appropriateness of the depreciation policy; and

- Reviewed accruals and payments made around the year end to ensure capital expenditure is accounted for in the correct year.

Our findings

Following our audit challenges and procedures, management made a change to the accounts to recognise a material impairment to Champion Hill buildings (£20m). Please see page 16-17 for further details on this matter. Otherwise, we identified no material issues relating to this risk.

King's College London
Significant risks and other audit risks

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

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Significant risk

Management's assessment of the College's ability to continue as a going concern involves significant judgment with respect to student enrolments, particularly international students, due to the continuing impacts of Covid-19, Brexit and other global challenges.

There is a risk that disclosures in the financial statement and the annual report are not adequate with regard risks to the university's financial position, performance, business model and strategy.

Our response

We performed the following procedures:

— 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 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 evaluated whether the key assumptions are within a reasonable range, and assessed the plausible but severe downside scenarios;

— 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; and

— Challenged management's plans for future actions, and verified the reliability and relevance of data used. Determine whether the outcome of these plans is likely to improve the situation and whether management's plans are feasible.

Our findings

Our work over going concern up to date, with no significant or material issues noted. We continue this work programme up to the date of signing the accounts.

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King's College London
Significant risks and other audit risks

8 **Estimates and judgments over other material provisions and accruals**

other audit risks

The College has made or updated provision, accrued expenditure and impairment expenditure items in the 2021/22 accounts relating to three issues:

1. **Global mobility accrual** – this relates to the tax and social security liability the College believes it has incurred from staff working in overseas jurisdictions over recent years. This has been an increasing focus area following the pandemic and is an area the College continues to investigate and estimate the likely liability. There is a definite incurred liability going back at least six years, and management has provided initial analysis which arrives as an estimated accrual of £15m.

2. **Pearson onerous contract** – this relates to a contract with Pearson, entered into in 2015, for them to be the exclusive provider of any online tuition services. With the pandemic, the College has been exploring options for online tuition and other digital services with a range of providers and has concluded that the existing Pearson contract has become "onerous" in accounting terms. In line with correspondence received at year-end, management has recognised what they believe to be a reliable estimate liability (accrual in the draft accounts) of c£19m in relation to this item.

1. Our response – in relation to the **global mobility accrual** we have:

- Critically assessed management's assessment and proposal. This included providing challenges and comments on management's paper.
- Held formal inquiries with the College's Global Staff Mobility Lead and challenged key methodology and assumption items included in the College's estimate, including average salary and estimated numbers of staff affected assumptions, and the methodology of utilising one surveyed faculty and extrapolating findings across all faculties.
- Reviewed and challenged the recognition of an accrual liability, including whether the classification on the balance sheet is compliant with accounting standards.
- Challenged and recalculated the estimated accrual value recognised in the latest draft accounts to confirm material accuracy, existence and completeness.
- Assessed and challenged the appropriateness of management's sensitivity analysis to confirm no material issues.
- Checked the appropriateness of all related disclosures in the accounts to relevant FRS102 requirements.

Our findings – We have concluded no material issues relating to the £15m.

2. Our response - in relation to the **Pearson onerous contract** liability we have:

- Critically assessed management's assessment and proposal. This included providing challenges and comments on management's paper.
- Reviewed and challenged the recognition of an onerous contract liability, including whether the circumstances appropriately meet the onerous contract definition set out in FRS102.
- Challenged and confirmed the estimated liability value recognised in the latest draft accounts to confirm material accuracy, existence and completeness. This included confirming to third part documentation from Pearson themselves.
- Assessed and challenged the appropriateness of management's sensitivity analysis to confirm no material issues.
- Checked the appropriateness related disclosures in the accounts to relevant FRS102 requirements.

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King's College London
Significant risks and other audit risks

8   **Estimates and judgments over other material provisions and accruals (cont.)**

other audit risks

3. **Champion Hill fire safety issue** – in December 2019 a safety inspection of the College's Champion Hill properties identified an issue with fire stops and a decision was made to evacuate the buildings and transfer affected students to alternative accommodation. Since then, the College has been exploring the right strategic resolution for the buildings, and in the previous two financial years has held a liability value in the accounts of c£20m relating to their then reliable estimate of the obligated rectification costs. However, in April/May 2022, the College commissioned and received a third party surveyor report which valued "essential" remedial costs as significantly higher than the £20m continued to be held in the 2021/22 draft accounts. After audit challenge and procedures, management commissioned Gerald Eve (third party valuation experts) to update their valuation report to incorporate the updated surveyor's report. This led to a significant diminution in the value of the buildings – an estimated impairment of £20.6m. Management updated the draft accounts to remove the £20m liability and instead recognise a £20m impairment.

2. Our response (cont.):

Our findings - Our work over the Pearson onerous contract liability is complete and we have concluded no material issues. We do note the item is currently included as an accrual when it would be more appropriate as a provision, however we note this classification is driven by the item being linked to a live negotiation with commercial sensitivity.

3. Our response – in relation to the **Champion Hill** fire safety issue we have:
-   Critically assessed the competence, capability, objectivity and independence of the College external valuation experts (Gerald Eve) and the terms of engagement of, and instructions issued to, the valuer for consistency with the requirements of FRS 102. We also held a formal inquiries meeting directly with Gerald Eve to specifically challenge and assess their approach and assumptions in updating their valuation of Champion Hill buildings.
-   Critically assessed management's assessment and proposal. This included providing challenges and comments on management's paper.
-   Reviewed and challenged the recognition of the original £20m accrual liability and subsequently the £20m impairment, including whether the classification on the balance sheet is compliant with accounting standards.
-   Challenged and confirmed the estimated impairment value recognised in the latest draft accounts to confirm material accuracy, existence and completeness. This included confirmation back to the updated Gerald Eve valuation report.
-   Checked the appropriateness of all related disclosures in the accounts to relevant FRS102 requirements.

Our findings – Our audit challenge around this item drove a material change in the accounts, to remove the accrual and instead recognise an impairment. In summary, we identified two material adjusted audit differences (£20m each, which have nil net bottom line impact in the SOCI). We initially identified one unadjusted audit difference totalling £2.3m, but following an updated report from Gerald Eve to more appropriately update for VAT treatment, the difference reduced to £0.6m which is below our reportable threshold.

King's College London
Significant risks and other audit risks

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8   **Estimates and judgments over other material provisions and accruals (cont.)**

**Further statement in relation to Champion Hill**

From discussions with management we understand that following the conclusion of the site survey and as at 31 July 2022 no decision has been made as to whether to rectify the fire safety issues associated with the Champion Hill residence. We understand that a decision will be made at some point in the future as part of the College's estates strategy and that a number of options will be considered.

Since no decision to rectify the property has been made as at 31 July 2022 and since the property remains non-operational the College has taken the decision to impair the building to reflect the circumstances as at the year end date.

King's College London

Key accounting estimates – 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. Cautious means a smaller asset or bigger liability; optimistic is the reverse.

Key

Cautious — Optimistic

Current year   Prior year
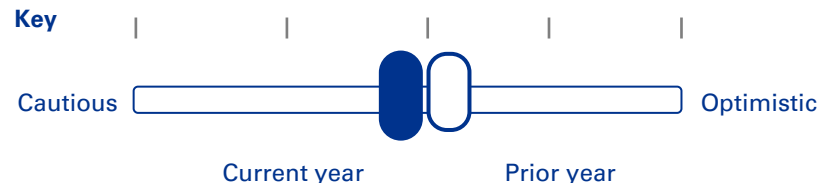
Asset/liability class	Our view of management judgement	Balance (£m)	YoY change (£m)	Our view of disclosure of judgements & estimates	Further comments
Asset: land Valuation of land	Cautious Neutral Optimistic	578.0	57.3	Needs improvement Neutral Best practice	The College includes land at a revalued amount rather than at cost. The College uses a valuation expert to value the land following the requirements of FRS 102. We are satisfied with the basis for the valuation, and find the underlying assumptions to be slightly cautious. The disclosure could be improved by adding descriptions of the key underlying assumptions in the valuation.
Liability : USS pension Valuation of net pension liability		(405.3)	(283.8)		The judgements underlying the valuation of the USS net pension liability are the discount rate, based on the Mercer Yield Curve UK, salary increases and changes in staff numbers. Our view is that the assumptions in the current year are optimistic, but with our acceptable range.

King's College London

Significant audit misstatements

Group Materiality = 18.5m
College Materiality = 18.0m

Management has approved the correction of the audit misstatements detailed on page 28 and they are reflected in the draft financial statements. A summary of the uncorrected audit misstatements above our reporting threshold is also detailed on page 28.

The misstatements identified, and their estimated financial impact on the deficit before tax, all relate to the Champion Hill adjustments. In summary, two misstatements have been adjusted for an mean a reduction in accruals of £20m and an increase in buildings impairment of £20m i.e. with no bottom line SOCI impact. We initially identified one unadjusted audit difference totalling £2.3m, but following an updated report from Gerald Eve to more appropriately update for VAT treatment, the difference reduced to £0.6m which is below our reportable threshold. We also identified minor disclosure updates required and made across the accounts.

Key comments

— No uncorrected misstatements have been identified above our clearly trivial threshold.

— For our views on management estimates – see Page 18 (Key accounting estimates).

— A detailed summary of corrected and uncorrected audit misstatements and omissions and errors in disclosure is included at Appendix Three.

King's College London

Group audits – Subsidiaries and Trust

The Group financial statements are made up of the following components:

— King's College London

— College Facilities Limited

— King's College London Business Limited

— King's Talent Bank Limited

We are in the process of completing our audit of King's College Theological Trust.

As communicated in our audit plan we determined that the College was the only significant component. We have performed risk assessment procedures over the remaining components in order to confirm that there were not material balances within the other entities that could cause a material error and did not identify any exceptions.

Planned response

As set out in our audit plan presented on 7 June 2022 we recognised significant risks relating to management override of controls only.

We have rebutted the fraud risk over revenue recognition because the revenue streams are simple, and distributable profits of the subsidiaries are subsequently returned to the College via Gift Aid.

We have reassessed materiality for each subsidiary based on the income disclosed in the draft financial statements to:

— College Facilities Limited – £145,000 (£170,000 in the plan)

— King's College London Business Limited – £297,000 (£230,000 in the plan)

— King's Talent Bank Limited - £350,000 (£350,000 in the plan)

Outcome from audit work

Our audit methodology incorporates the risk of management override of controls as a default significant risk. We have considered journals, unusual transactions and any estimates/judgements made by management.

Work is still being finalised but no significant issues have been identified from these audits to date.

Separate reports will be presented to the relevant subsidiary Boards providing detailed results of our audits.

King's College London

Other matters

Annual report

We have read the contents of the Annual Report. We have checked compliance with the Accounts Direction dated 25 October 2019 issued by the Office for Students.

Based on the work performed:

— We have not identified any inconsistencies between the contents of the Strategic and Director's Reports and the financial statements.

— We have not identified any material inconsistencies between the knowledge acquired during our audit and the director's statements. As Directors you confirm that you consider that the annual report and accounts taken as a whole are fair, balanced and understandable and provide the information necessary for regulators and other stakeholders to assess the Group's performance, business model and strategy.

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.

Audit Fees

Our fee for the audit was £88,750 plus VAT (£80,750 in 2021/22) for the College, £4,500 plus VAT (£4,100 in 2021/22) for each of the three individual subsidiaries and the Trust. We have also completed non audit work at the Group during the year on US GAAP accounts, US loans, NCTL grant and Corporation Tax, and have included in appendix four confirmation of safeguards that have been put in place to preserve our independence.

King's College London
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
We compared the financial performance for the year to budget and the cause of variances. We reviewed the University's correspondence with the Office for Students during the year. All items deemed standard and expected. We reviewed 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. We confirmed that there are appropriate policies and procedures in place, including provision of whistleblowing and anti-fraud and bribery requirements. We reviewed how the College 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. No non-compliance has been identified.	We assessed whether there were appropriate controls in place for the management of expenditure, including findings from our payroll and non-pay expenditure work. 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.	As part of our substantive audit procedures we undertook sample testing of research income and expenditure and the use of capital grants from the Office for Students. We confirmed that expenditure incurred against funding received was utilised for appropriate purposes. We also completed the following procedures: ▪ Review of significant expenditure such as capital projects or acquisitions and disposals of operations; ▪ Review of significant unusual transactions, for example the acquisition of Bush House South West Wing; ▪ Review of any suspected or identified frauds; and ▪ Review of redundancy payments. We also reviewed a sample of manual journals posted during the year to verify that they were appropriate and that controls had operated as expected.

We have not identified any matters that would require us to modify our opinion in respect of use of funds.

Appendix

Required communications with the Audit, Risk and Compliance Committee

Type		Response
Our draft management representation letter	OK	We have not requested any specific representations in addition to those areas normally covered by our standard representation letter for the year ended 31 March 2022.
Adjusted audit differences	OK	There were two adjusted audit differences with an impact on deficit of £0 million. See page 28.
Unadjusted audit differences	OK	The aggregated impact on the deficit before tax of unadjusted audit differences would be to increase the deficit by £0.6m. See page 28.
Related parties	OK	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 [and Risk] Committee	OK	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	OK	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	OK	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 was identified during the audit.

Appendix one
Required communications with the Audit, Risk and Compliance Committee

Type		Response
Significant difficulties	OK	No significant difficulties were encountered during the audit.
Modifications to auditor's report	OK	None.
Disagreements with management or scope limitations	OK	The engagement team had no disagreements with management and no scope limitations were imposed by management during the audit.
Other information	OK	No material inconsistencies were identified related to other information in the annual report, Strategic and Directors' reports. The Strategic report is fair, balanced and comprehensive, and complies with the law.
Breaches of independence	OK	No matters to report. The engagement team have complied with relevant ethical requirements regarding independence.
Accounting practices	OK	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	OK	No significant matters arising from the audit were discussed, or subject to correspondence with management.

Appendix two

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		
❶ **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.	❷ **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.	❸ **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
Financial Statements			
1	❸	**Timely review of bank reconciliations** The cash reconciliations for the NatWest GBP account for January and February were not reviewed in a timely manner, which we would consider to be within the month of the reconciliation. We recommend that all bank reconciliations are completed and reviewed in a timely manner each month to allow time for appropriate investigation and resolution of variances.	Due to a period of staff absence for personal reasons within the Financial Accounts team, combined with another vacant role within the team being in the process of being recruited to at the same time, some bank recs were not formally reviewed within a month of being prepared during the period noted. However, bank recs continued to be prepared on a timely basis and shared with other members of the Finance Department as required for action to be taken. Management do not consider this to have presented a risk to financial control around cash or the bank rec process.

Appendix two

Recommendations raised and followed up

We have also follow up the recommendations from the previous years audit, in summary:

Total number of recommendations	Number of recommendations implemented	Number outstanding:
1	0	1

#	Risk	Issue, Impact and Recommendation	Management Response / Officer / Due Date	Current Status (Oct 2022)
Financial Statements				
1	❷	**Management review of journals** There continues to be no evidenced formal process to review journals as staff are allowed to post journals without them being approved. We recognise that the current general ledger does not allow for efficient automated journal authorisation controls, and that as the system will be changed next year it is not efficient to implement system changes to allow this. **Recommendation** 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.	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.	Management has designed a new retrospective risk based monthly review control of manual journals which, we understand, introduced shortly before year end. We deem this recommendation has therefore been partially implemented but will require further follow up to confirm effective design and operating effectiveness.

Appendix three

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 recommend you consider the detail of all uncorrected misstatements. However, they 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 £925K are shown below:

Unadjusted audit differences (£m)				
No.	Detail	SOCI Dr/(cr)	SOFP Dr/(cr)	Comments
Total				No uncorrected differences greater than £925k have been identified in our work.

Under UK auditing standards (ISA (UK) 260) we are required to provide 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 (£m)				
No.	Detail	SOCI Dr/(cr)	SOFP Dr/(cr)	Comments
1	Dr expenditure accruals		£20.0	In relation to Champion Hill, utilising Gerald Eve's updated assessment, management has updated the 2021/22 accounts to reverse out the £20m accrual and instead recognise a £20m impairment of the buildings. We note the valuer's report suggests the impairment is £22.3m, but management has decided to only impair by £20m, leaving an unadjusted audit difference of £2.3m, which is not deemed material (see above). See pages 16-17 for details.
	Cr operating expenditure	(£20.0m)		
2	Dr fixed asset impairment expense	£20.0m		
	Cr property, property plant and equipment (buildings)		(£20m)	
Total		£0.0m	£0.0m	

We identified some disclosure updates through the course of our audit, none of which were deemed material. We do note that the estimated value of land in the expert valuer's report is c£5m higher than included on the balance sheet. Hence management's land valuation estimate is deemed slightly cautious, but this is not deemed a material difference.

Appendix four

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 the King's College London (the College)

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 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, directors 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

Facts and matters related to the provision of non-audit services and the safeguards put in place that bear upon our independence and objectivity, are set out below.

Appendix four
Confirmation of Independence

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:

	2021/22	2020/21
Audit fees	£	£
Audit of KCL financial statements	£88,750	£80,750
Additional work on going concern as a result of Covid-19	£0	£2,000
King's Talent Bank Limited	£4,500	£4,100
King's Business Limited	£4,500	£4,100
College Facilities Limited	£4,500	£4,100
US GAAP accounts	£50,000	£0
Total audit	**£152,250**	**£95,050**
US Loans	£11,000	£10,000
NCTL grant	£4,500	£4,100
Taxation services – CT compliance, iXBRL, PAYE, accommodation benefits	£42,500	£24,000
Total non-audit services	**£58,000**	**£38,100**
Total Fees	**£210,250**	**£133,150**

Fee ratio

The ratio of non-audit fees to audit fees for the year at the time of planning is 0.4: 1. We do not consider that the total non-audit fees create a self-interest threat since the absolute level of fees is not significant to our firm as a whole.

Application of the FRC Ethical Standard 2019

We communicated to you previously the effect of the application of the FRC Ethical Standard 2019. That standard became effective for the first period commencing on or after 15 March 2020, except for the restrictions on non-audit and additional services that became effective immediately at that date, subject to grandfathering provisions.

We confirm that as at 15 March 2020 we were not providing any non-audit or additional services that required to be grandfathered.

Confirmation of audit independence

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

This report is intended solely for the information of the Audit 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

Appendix five

FRC's areas of focus

The areas of focus from the FRC's Annual Review of Corporate Reporting 2020/21, annual letter to CEOs, CFOs and audit committee chairs along with the five thematic reviews issued in 2021 should be considered for reporting in the current financial period. The reports identify where the FRC believes organisations should be improving their reporting. Below is a high level summary of the key topics. We encourage management and those charged with governance to read further on those areas which are significant to the Registered Provider.

Judgements and Estimates	In the current climate it is particularly important for entities to provide as much context as possible for the assumptions and predictions underlying the amounts recognised in the financial statements, including potential sensitivities or ranges of possible outcomes.
	Trusts should disclose the carrying amounts impacted by estimation uncertainty. Disclosures of key assumptions and sensitivities could be improved. Preparers are encouraged to clearly distinguish between sources of estimation uncertainty with a significant risk of a material adjustment in the following year and other, perhaps longer-term, uncertainties.
	Significant accounting judgements should be clearly explained along with factors considered.
Revenue	Having raised a considerable number of queries in relation to revenue recognition policies and related disclosure, the FRC strongly encourage preparers to read their thematic report which includes tips and examples of good and inadequate disclosure.
	Entities should disclose significant judgements made in accounting for revenue. This could include judgements in relation to performance obligations, transaction price and amounts allocated to performance obligations. Disclosures should clearly identify the methods used to estimate any variable consideration.
Statement of Cash Flows	Organisations need robust reviews of the cash flow statement to ensure consistency with other parts of the annual report and to ensure preparation in line with the accounting standard.
	Errors continue to be identified, including inappropriate classification of cash flows and inappropriate netting. The FRC also challenges organisations on the composition of cash equivalents and on incomplete or incorrect related disclosures.
	Organisations are reminded that even in the limited cases where borrowings can be included as a component of cash and cash equivalents in the cash flow statement, the IAS 32 'Financial Instruments: Presentation' criteria need to be applied to determine whether they can be presented on a net basis in the balance sheet.
Alternative Performance Measures (APMs)	APMs should not be given undue-prominence. Preparers should avoid statements appearing to provide APMs with more authority than IFRS measures and are reminded that meaningful commentary on the IFRS figures is required.
	APMs, including ratios, should be appropriately labelled and reconciled to the most directly reconcilable financial statement line item. It should be clear how reconciling items are determined and companies should explain clearly why amounts are excluded from adjusted measures. Adjusting items should include gains as well as losses, where relevant.

Appendix five

FRC's areas of focus

Strategic Report	The annual report should provide a fair, balanced and comprehensive analysis of the development and performance of the business in the financial year and of its position at the end of the year. In particular companies are encouraged to include discussion of relevant significant matters and performance against key strategic objectives.
Provisions and contingencies	Provisions and contingencies should be clearly explained including the nature of the exposure, the timeframe and the basis for determining the amount. Any significant judgements and relevant assumptions should be disclosed clearly. There should be consistency between information provided in the annual report and accounts. If material provisions are dependent on the future performance of a business expected to be heavily impacted by climate change, this should be disclosed and detail provided on how climate change had been taken into account in the estimate.
Leases	Lessees and lessors are required to disclose information that gives a basis for users to assess the effect of leases on financial position, financial performance and cash flows. This could include information about variable payment features, for example. Judgements should be disclosed. Entity-specific accounting policies should be disclosed for material transactions.
2021/22 priorities for FRC review: - **Impact of COVID-19**	In addition to the topics summarised above, the FRC have indicated that routine monitoring for the 2021/22 cycle will include a focus on: - judgement and uncertainty in the face of continuing economic and social impact of Covid-19; and - climate-related risks and new disclosures. Disclosure on judgements and assumptions about the future will remain important to users of reports, particularly when considering matters such as going concern and liquidity. Therefore as part of their routine 2021/22 routines, the FRC will continue to consider whether entities: - Explain the significant judgements and estimates made; - Provide meaningful sensitivity analysis or details of a range of possible outcomes; - Describe any significant judgements made in determining whether there is a material uncertainty about their ability to continue as a going concern; and - Ensure that assumptions used in the going concern assessment are compatible with those used elsewhere.

ISA (UK) 315 Revised: Overview

Low   High

Summary

ISA (UK) 315 *Identifying and assessing the risks of material misstatement* incorporates significant changes from the previous version of the ISA. These have been introduced to achieve a more rigorous risk identification and assessment process and thereby promote more specificity in the response to the identified risks. The revised ISA is effective for the 2022-23 financial year onwards.

The revised standard expands on concepts in the existing standards but also introduces new risk assessment process requirements – the changes will have a significant impact on our audit methodology and therefore audit approach.
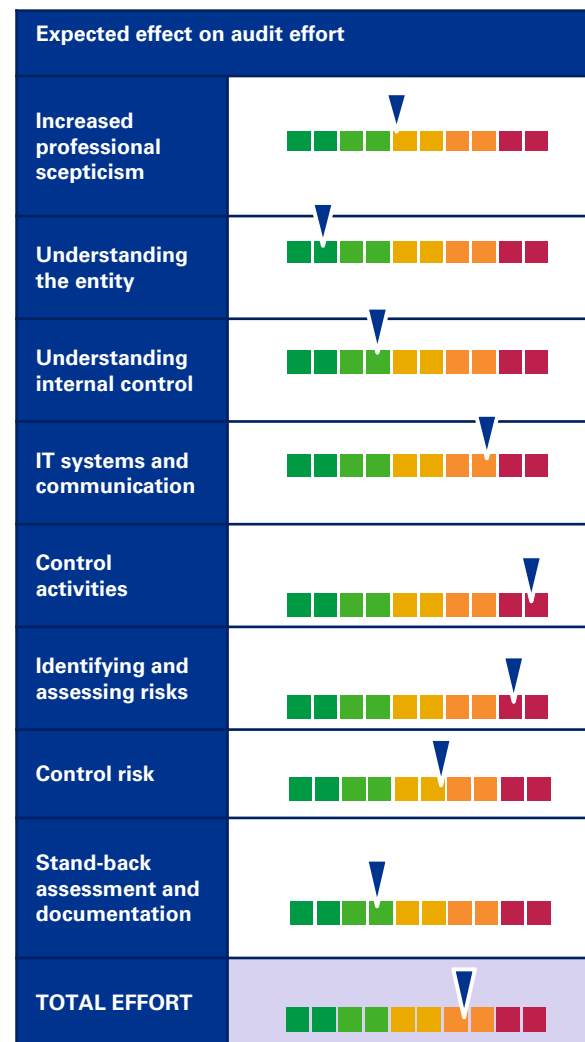
Why have these revisions been made?

With the changes in the environment, including financial reporting frameworks becoming more complex, technology being used to a greater extent and entities (and their governance structures) becoming more complicated, standard setters recognised that audits need to have a more robust and comprehensive risk identification and assessment mechanism.

The changes are aimed at (i) promoting consistency in effective risk identification and assessment, (ii) modernising the standard by increasing the focus on IT, (iii) enhancing the standard's scalability through a principle based approach, and (iv) focusing auditor attention on exercising professional scepticism throughout risk assessment procedures.

What does this mean for an audit?

To meet the requirements of the new standard, auditors will be required to spend an increased amount of time across the risk assessment process, including more detailed consideration of the IT environment. We expect these changes to result in significantly increased audit effort levels which will, in turn, affect auditor remuneration. This additional effort is a combination of time necessary to perform the enhanced risk assessment procedures and the anticipated need to involve more technical specialists (particularly IT Audit professionals) in our audits.

Given the level of changes to the standard, debate remains ongoing about the extent of impact on application of some paragraphs. Global regulators have committed to providing further clarification in this area in advance of adoption, and there may therefore be some later updates to our initial assessment of relative impact.

Expected effect on audit effort

Category	Effort level
Increased professional scepticism	Medium
Understanding the entity	Low
Understanding internal control	Medium
IT systems and communication	High
Control activities	Very High
Identifying and assessing risks	High
Control risk	Medium-High
Stand-back assessment and documentation	Low-Medium
TOTAL EFFORT	High

ISA (UK) 315 Revised: Summary of key changes

Low   High

Area	Impact on audit effort	Summary of changes and impact
Increased professional scepticism		Increased focus on applying professional scepticism – particularly the need for auditors not to bias their approach towards obtaining evidence that is corroborative in nature or excluding contradictory evidence, which requires more independent evidence to be sought. In all cases, there will be enhanced documentation requirements in this area.
Understanding internal control		The previous standard included requirements for understanding components of the entity's system of internal control. The revisions add another step by requiring auditors perform evaluation procedures over these. This may require additional effort to evaluate the entity's processes over risk assessment and monitoring activities over internal control systems to assess their appropriateness to the entity's size and complexity.
IT systems and communication		The requirements introduce an increased focus on understanding the entity's own management of IT. This may entail performing additional risk assessment procedures and taking a broader view across the IT environment, considering more systems and systems in greater depth, than previously. Given the complexity and specialist knowledge required to perform these procedures, increased use of technical IT Audit specialists will be a natural consequence of this revision.
Control activities		The revised standard enhances the way we identify IT applications and aspects of the IT environment that are subject to assessed risks arising from IT. This may result in significant expansion of risk assessment procedures to obtain and evaluate the necessary information. Further, the standard adds new requirements in control testing activities to mandate evaluation of general IT controls that address risks arising from IT associated with significant risks and certain journal entries. For these controls, the auditor is required to evaluate the design and implementation of the individual controls. This could result in a significant change in approach, with more emphasis and effort spent on evaluating control activities. Again, we anticipate integrating more specialised expertise into our audit team to meet the revised requirements.
Identifying and assessing risks		The changes require more detailed assessment of risks at both the financial statement and assertion levels for classes of transactions, account balances and disclosures than previously. Further, the revisions introduce an inherent risk spectrum and new inherent risk assessment factors, each of which the auditor evaluates to assess the level of risk and thereby shape the audit response. This will increase the audit effort needed to evaluate and document the risks of material misstatement.
Control risk		New requirement to assess inherent risk and control risk separately for each risk of material misstatement identified where the auditor plans to test the operating effectiveness of controls. The separation of assessments will require individual attention, increased documentation and is likely to affect sample sizes for substantive procedures.
Stand-back assessment		New requirement to perform a stand-back assessment for material classes of transactions, account balances or disclosures which have not been identified as significant, to assess whether this determination remains appropriate in the context of the overall audit. This will require increased consideration of aggregation risk and introduce additional documentation requirements.

ISA (UK) 240 Revised: Summary of key changes

Low   High

Summary and background

ISA (UK) 240 *The auditor's responsibilities relating to fraud in an audit of financial statements* includes revisions introduced to clarify the auditor's obligations with respect to fraud and enhance the quality of audit work performed in this area. The revised ISA (UK) is effective for periods commencing on or after <u>15 December 2021</u>. Unlike ISA (UK) 315 which mirrors updates in the international ISA, the updated UK fraud standard is not based on international changes by the IAASB.

The impact of the revisions to ISA (UK) 240 is less extensive compared to ISA (UK) 315, but will nevertheless result in changes to our audit approach. The table below summarises the main changes and our initial assessment of their impact.

Area	Summary of changes and impact	Effect on audit effort
Risk assessment procedures and related activities	[1] Increased focus on applying professional scepticism – the key areas affected are: • the need for auditors not to bias their approach towards obtaining evidence that is corroborative in nature or excluding contradictory evidence, • remaining alert for indications of inauthenticity in documents and records, and • investigating inconsistent or implausible responses to inquiries performed. [2] Requirements to perform inquiries with individuals at the entity are expanded to include, amongst others, those who deal with allegations of fraud. [3] Every audit now requires a specific determination as to whether to involve technical specialists (including forensics) to aid in identifying and responding to risks of material misstatement due to fraud. This will result in increased involvement of specialists and an expanded scope of work for these specialists, on audit engagements.	
Internal discussions and challenge	Enhanced requirements for internal discussions among the audit team to identify and assess the risk of fraud in the audit, including a requirement to determine the need for additional meetings to consider the findings from earlier stages of the audit and their impact on our assessment of the risk of fraud.	
Communications with management / TCWG	New requirements for communicating matters related to fraud with management and those charged with governance, in addition to the reporting in our audit reports.	

What does this mean for an audit?

The changes introduce new requirements which will increase audit effort and therefore the audit fee. The additional work is largely the result of investing more time identifying and assessing the risk of fraud during risk assessment and involving specialists to aid with both risk identification and the auditor's response to risk.

Document Classification: KPMG Confidential

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22 November 2022

Dear Fleur,

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 2022, 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 and University's affairs as at 31 July 2022 and of the Group's and University's income and expenditure, gains and losses, changes in reserves and Group cash flows for the financial year then ended; and

 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, the Group and University's Statements of Changes in Reserves, the Group Statement of Cash Flows and notes, comprising a summary of significant accounting policies and other explanatory notes.

The Council confirms that the University meets the definition of a qualifying entity and meets the criteria for applying the disclosure exemptions with FRS 102.

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 19 September 2018, 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 University's income and expenditure, gains and losses and changes in reserves for that financial year; and

 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. The effects of uncorrected misstatements are immaterial, both individually and in aggregate, to the financial statements as a whole. A list of the uncorrected misstatements is attached to this representation letter.

Information provided

5. The Council has provided you with:

- access to all information of which it is aware, that is relevant to the preparation of the financial statements, such as records, documentation and other matters;
- additional information that you have requested from the Council for the purpose of the audit; and
- unrestricted access to persons within the Group and the University from whom you determined it necessary to obtain audit evidence.

6. All transactions have been recorded in the accounting records and are reflected in the financial statements.

7. The Council confirms the following:

i)   The Council has disclosed to you the results of its assessment of the risk that the financial statements may be materially misstated as a result of fraud.

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

ii)   The Council has disclosed to you all information in relation to:
    a) Fraud or suspected fraud that it is aware of and that affects the Group and the University and involves:
        - management;
        - employees who have significant roles in internal control; or
        - others where the fraud could have a material effect on the financial statements; and
    b) allegations of fraud, or suspected fraud, affecting the Group and the University's financial statements communicated by employees, former employees, analysts, regulators or others.

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

8. The Council has disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing the financial statements.

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

10. The Council has disclosed to you the identity of the Group and the University's related parties and all the related party relationships and transactions of which it is aware. All related party relationships and transactions have been appropriately accounted for and disclosed in accordance with 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.

11. The Council confirms that:

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

12. On the basis of the process established by the Council and having made appropriate enquiries, the Council is satisfied that the actuarial assumptions underlying the valuation of 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.

13. 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.

14. The Council are not aware of any issues relating to the Group and University's other Office For Students or Research England funding streams (e.g., Higher Education Innovation Fund grants) which may lead to a clawback in funding over and above that recognised in the financial statements.

15. 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.

16. To the best of our knowledge and belief the Group and University has complied with the terms and conditions of any revenue grant funding (for example research funding) received in recent years and where agreed outputs are to be delivered as part of the grant agreement, the University has or anticipates delivering these.

17. 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 2022.

18. In all material respects the judgements made in year by the College relating to our global mobility accrual, the onerous contract with Pearson and the impairment of Champion Hill buildings reflect the relevant information available as at the 31 July 2022. We also confirm that we have made fair, informed. materially accurate and complete assessments based upon that information. Specifically

in relation to Champion Hill, we confirm that no decision has been made to rectify the fire safety issues as at the 31 July 2022 and that since the associated asset it not operational as at the 31 July 2022 the decision to impair is appropriate.

19. 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.

20. The Council confirms that costs or credits attributable to the agreement of a deficit recovery plan for the Universities Superannuation Scheme (USS) are calculated using assumptions that are consistent with its knowledge of the business. In particular, the Council confirms that the assumptions for assumed salary inflation in each year during the life of the plan and assumed USS membership changes during the life of the plan
are consistent with the Group and University's projected employee population profile.

21. 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.

22. There are no issues arising from the finalisation of student data for the year ending 31 July 2022 which has been used to produce the University's 2022 HESA return/re-creation of HESES22 which would have a material impact on teaching funding from the Office for Students or English undergraduate fee income recognised in the financial statements.

23. 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 2021 to 31 July 2022.

24. 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.

25. All payments made from endowment funds have been made in accordance with the terms of the funds to which they relate

26. 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.

27. There are no other factors affecting the valuation of investment properties that need to be reflected in the accounts to 31 July 2022 other than as disclosed to you.

28. There are no formal or informal compensating balance arrangements with any of our cash and investment accounts.

This letter was tabled and agreed at the meeting of the Council on *22 November 2022*.

Yours faithfully,

[Chairman]

[Secretary]

Optional cc: Audit, Risk and Compliance Committee

Appendix 1 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 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).

The entity, or any member of a group of which it is a part, provides key management personnel services to the reporting entity or to the parent of the reporting entity.

Related party transaction:

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

Appendix 2 – list of uncorrected audit misstatements

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 £925K are shown below:

Unadjusted audit differences (£m)				
No.	**Detail**	**SOCI Dr/(cr)**	**SOFP Dr/(cr)**	**Comments**
1	Dr fixed asset impairment expense Cr property, property plant and equipment (buildings)	£2.3m	(£2.3m)	This relates to the unrecognised impairment on Champion Hill buildings.
Total		**£2.3m**	**(£2.3m)**	

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Audit, Risk and Compliance Committee

Meeting date	08 November 2022
Paper reference	ARCC1122I
Status	Final
Access	Members and senior executives

Annual Prevent Report

Action required

☒ For approval or recommendation
☐ For discussion
☐ To note

Motion: That the Audit, Risk and Compliance Committee **recommend** to College Council that the Annual Prevent Report for the year ended 31 July 2022 **be approved**.

Executive summary

Under the Counter Terrorism and Security Act (2015), all HEIs are required to have a due regard to the obligations laid out in the Prevent Duty: Framework for monitoring in higher education in England from the Office for Students.

One obligation is that an annual Data Return is submitted to the Office for Students by December. The Data Return must indicate the extent to which the university has complied with its statutory duties during the year and must be accompanied by a signed declaration from the chair of the university's governing body.

The annual report in this paper provides a summary of the university's Prevent Duty activities and includes the Data Return (section 2), which must be approved by the governing body.

This report and data return were endorsed by the Safeguarding Steering Group in October 2022.

Members of the ARCC are requested to consider the annual Prevent report for the 2021-22 academic year and **recommend** it to the College Council for **approval**.

Academic Regulations, Quality & Standards

October 2022

Section 1: King's College London Prevent Duty Report 2021/22

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 demonstrates a due regard for the Duty, which applies to the governing bodies or proprietors of 'relevant higher education bodies' (RHEBs).

In the Office for Students (OfS) guidance for the 2020-21 Prevent Accountability and Data Return (ADR) submission, it was noted that the OfS would no longer issue compliance judgements as part of the process. The 2020/21 ADR was submitted to the Office for Students (OfS) in November 2021. In May 2022, the Executive Director of Students & Education, who is the university Prevent Lead, received notification from the OfS that they had reviewed the information provided and had no queries about the ADR submission.

The information below sets out the university's Prevent Duty activity in 2021/22.

Management and Governance

The Academic Regulations, Quality and Standards (ARQS) team[1] maintains oversight of the university's Prevent Duty obligations and monitors the Prevent Duty Risk Assessment and Action Plan, organises staff training, and ensures policies and processes are updated accordingly. The SED Compliance Manager is the officer for the Safeguarding Steering Group and the Safeguarding Oversight Group, which support Prevent Duty activity. The ARQS team also submit termly updates to the Director of Business Assurance.

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 KCLSU President is a member of the Steering Group.

The Safeguarding Oversight Group monitors operational aspects of delivering the Prevent Duty as well as wider Safeguarding activities at the College. In December 2021, the Safeguarding Oversight Group meeting schedule was rationalised from six meetings per year to four meetings. The change in meeting schedule was to ensure good oversight of safeguarding activity is maintained whilst allowing enough time for work generated by the group to be managed.

The KCLSU Head of Advice and KCLSU Vice President for Welfare and Community (2021/22) engaged with the Oversight Group throughout the 2021/22 academic year, attending a proportion of meetings. The KCLSU President (2021/22), Vice President Education (Health) and Vice President Postgraduate attended a meeting in April 2022 to discuss the university's approach to Safeguarding and the Prevent Duty as well as an opportunity to review our training materials. The Prevent Lead continues to meet with the KCLSU sabbatical officers as part of their role as the Executive Director of Students & Education. The Prevent Duty and our approach to compliance is discussed as and when necessary.

During 2021/22, a Safeguarding area was developed on the ARQS SharePoint to share meeting papers as well as house a specialist resources document library for key teams to provide additional briefings on safeguarding and prevent-related content to ensure sensitive content is shared in a secure manner. The guidance document on what constitutes a material incident or reportable event and who needs to be informed is included in the specialist resources document library.

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[1] The team was known as the Academic Regulation, Policy and Compliance (ARPC) team prior to the SED reconfiguration.

The external webpage on the university's approach to the Prevent Duty was moved over to the new webpage layout during 2021/22. The [internal webpages on Safeguarding](#) and [the Prevent Duty](#) continue to be available to all staff and have been reviewed and updated as appropriate.

Relationship with local partners

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) participated in a Channel panel between August and October 2021 for a referral made in the previous year. They also volunteered to participate in a working group being organised by the DfE Regional Prevent Coordinator for London, which will lead on workshops on referrals and Channel. The Head of Academic Policy attends the London HE Prevent Networks organised by the DfE and continues to act as a HE representative on the Lambeth Prevent Advisory Group. They also participated in a pilot for a new DfE Prevent training session on Gaming & Extremism, providing feedback from a HE perspective. Members of Student Services and ARQS, including the Specialist Welfare Advisors and Compliance Manager, 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.

During 2021/22, a briefing document on Incels language and terminology was created in response to the information shared at the Counter Terrorism Local Profile Briefing Session held in June 2021. The briefing document was signed off by the Prevent Lead and shared with key teams for information through the secure document library on SharePoint. Additional information was also incorporated into face-to-face training sessions and briefings for key teams. In August 2022, a training session was held with Security Managers and further content on hateful signs and symbols and proscribed groups was covered.

In June 2022, the updated Counter Terrorism Local Profile for London was received, and an overview was shared with the Safeguarding Steering Group. The particular focus for London is Extreme Right-Wing, Islamist Extremism, and Mixed, Unclear and Unstable ideologies. The Prevent Duty Risk Assessment and Action Plan is monitored by ARQS and reviewed annually by the Safeguarding Oversight and Steering Groups. Information on the Counter Terrorism Local Profile summary is built into the risk assessment, informing the College'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.

Welfare

The SOC Procedure continues to be the single point of referral for members of the university community to raise safeguarding and serious welfare concerns about any of our students, including those students who might be at risk of radicalisation. The aim is to provide consistency in how students are supported, a robust process for identifying students at risk, and support delivered in a timely fashion. The procedure is now fully online, and a rota system is in place to ensure it is constantly monitored and referrals are assigned to the appropriate caseworker. Support for students referred is coordinated by the SOC Management Group, which brings together staff from multi-disciplinary backgrounds. SOC reports are submitted to the Safeguarding Oversight Group regularly.

The College received **1636** referrals through SOC for the 2021/22 academic year - an increase of 61.9% on the 1010 referrals received in the previous year. We received **5** referrals that related to our Prevent Duty. The SOC Management Group assessed the referrals received and deemed that for one there was no concern regarding radicalisation and support was needed for other vulnerabilities. Of the four other referrals, the concerns related to Islamist radicalisation, extreme right-wing radicalisation, and mixed, unstable or unclear ideology. The origins of concern for the four students were as follows:

1. Concerns raised from within student body about a student exhibiting hate speech on social media

2. Concerning views expressed in a dissertation/assignment (2)

3. Behaviour online giving cause for concern

For one student, there were significant but general concerns regarding possible risk of harm to others and, as a result, a report was made directly to the Police (no further action was taken by the Police). After further internal investigations, it was agreed that the concerns raised about the student lacked substance and no further action was required.

The SOC Management Group referred the three remaining cases to our DfE Regional Prevent Coordinator for further advice. The College was advised to support broader vulnerabilities for these students using our Student Services. One of the students also had a staff capacity as a teaching assistant and the case was considered by both the LSO (Enrolled Students) and the LSO (staff). The student was initially suspended pending internal investigations and guidance from the DfE. It was confirmed that no further action was warranted, and support was provided to the student/staff member.

There were no other concerns relating to staff members or visitors.

Training

Face to Face

Staff training on Safeguarding and Prevent continues to cover an overview of the Duty as well as trends and ideologies and the use of non-mainstream platforms. Included in the training material is the behaviour barometer provided by the DfE, 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 newly developed iREPORTit app.

In the period 1 August 2021 to 31 July 2022, **142** members of staff received face to face training via Microsoft Teams on Safeguarding and Prevent either delivered by colleagues in SED or via the Department for Education. This included:

- **10 members of the newly introduced Faculty Wellbeing and Welfare Advisors;**

- **7 Lead and Designated Safeguarding Officers.** In addition to the introductory training, two Designated Safeguarding Officer Forum sessions were held;

- **9 members of Disability Support and Inclusion;**

- **11 members of Money & Housing;**

- **10 members of Visa & International Advice;**

- **33 members of Counselling & Mental Health;**

- **24 members of Student Services Frontline;**

- **7 members of Student Conduct & Appeals;**

- **16 Senior Tutors;**

- **8 members of the Academic Regulations, Quality & Standards team who maintain oversight of the university's compliance with the Duty;**

- **7 members of the Student Education Directorate** attended sessions run by the DfE Regional Prevent Coordinator. This included key team members from ARQS, the Lead Safeguarding Officer (Applicants), and members of Advice Wellbeing and Welfare, who assist in the management of the SOC process.

Positive feedback was received for the internally delivered training sessions. Further training sessions took place during August 2022 for Residences, Security and Senior Tutors and these will contribute to the 2022/23 OfS Prevent ADR.

E-learning

The e-module, Safeguarding at King's, was introduced in 2019/20 and this includes sections on the Prevent Duty and the university's Student of Concern Procedure. A light-touch review occurred in 2021/22 to ensure accuracy. An intranet page on the e-module has also been developed to provide further information for staff. The e-module has been rolled out to a number of teams, and now forms part of the induction pack in King's Foundations and Global Engagement.

In the period between 1 August 2021 to 31 July 2022, **168** staff members completed the module and passed the end of module assessment.[2] **11** members of staff began the e-module but are yet to complete. Positive feedback on the e-module has been received. In August 2022, discussions commenced with Health and Safety regarding whether the e-module could be made available to staff via the WorkRite platform.

Broader welfare and safeguarding awareness training

In October 2021, **19** 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 2021 and 31 July 2022, there were **6** new starters, who all completed the necessary induction training. **31** new members of Security staff received broader welfare and safeguarding awareness training, including on the Student of Concern procedure as part of their induction.

External Speakers

The university continues to work in collaboration with the Students' Union for events with external speakers. King's Venues and KCLSU coordinate and manage the external speaker process and escalate requests to the Freedom of Expression Standing Advisory Group (FESAG) where any high-risk events are identified and need further mitigations. A joint risk assessment process was introduced in 2020/21, unifying the contents of both the university and KCLSU risk assessments, and requiring minimal changes to processes, and continues to be used. KCL departmental bookings involving external speakers are also managed via this risk assessment process.

FESAG membership includes both university staff and members of KCLSU. The group is responsible for reviewing the KCL External Speaker Policy and the corresponding KCLSU External Speaker Procedure. The External Speaker Policy was reviewed during 2021/22 by FESAG and subsequently approved with an effective date of 1 August 2022. The review was conducted to ensure absolute alignment between KCL and KCLSU polices, provide clarity on how to manage events that are held as part of an academic course or programme that involve external speakers and provide clarity on how to manage student groups seeking to use space who were not connected to KCLSU. All students and staff are required to abide by this policy and associated procedures. Non-compliance with the policy and procedure would be considered under the university and students' unions conduct policies and procedures.

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[2] In total, 168 members of staff completed the e-module. However, 46 key members of staff completed the e-module and received face-to-face training. They have only been captured once in the dataset for the Office of Students.

In 2021/22, there were a mixture of online events and on campus events. **406** student-organised events involving external speakers (802 external speakers in total) were approved via the external speaker process. **12** of these student-organised events were risk assessed. There were **7** departmental bookings involving external speakers that were approved during the year. **2** of 7 events were risk assessed. Where risk assessments were conducted, mitigations were put in place as appropriate, such as, ticketing for the event, briefings for the chairs of the events and enhanced briefings for security staff. Of the events risk assessed, none were prevent-related. No events or speakers requests were rejected.

IT and Research

The IT Acceptable Use Policy includes a statement on the university's Prevent Duty, which can be found in the policy introduction. A guidance note on what constitutes a material incident/reportable event under the Prevent Duty, and who needs to be informed, has been shared with members of IT and the Research, Management and Innovation Directorate (RMID). The IT Directorate continues to monitor for incidents or procedural issues; there were no incidents in 2021/22. The Safeguarding Policy and Procedures were re-circulated to Switchboard and IT Service Desk staff to help maintain awareness. Particular attention was drawn to Procedure 1 (Safeguarding Roles and Responsibilities), which sets out who the safeguarding officers are and what their roles involve, and Procedure 3 (Reporting a Safeguarding Concern), which explains sets out how concerns can be reported.

The April Department for Education Prevent Network noted that some universities had received Russian propaganda. Advice was given for these emails not to be forwarded on in the institution and should instead be sent to the DfE Regional Coordinator and cyber security should be reviewed if propaganda is received. A possible risk of cyber-attacks was also noted if links were clicked on. This information was passed onto KCL IT Service Desk by IT Assurance who have since ensured that the Service Desk Analysts are aware of what to do if they are notified of the receipt of a potential propaganda email. The details of the DfE Coordinator have been provided so IT can action this immediately if anything is received. A notification of any such action is also to be sent to the ARQS inbox.

The university's approach to approving, supporting and managing security-sensitive research has been reviewed and the Security Sensitive Research Policy and Procedure have been introduced. The policy was developed to ensure researchers are protected and that risks are appropriately mitigated. The policy and procedure were approved by Academic Board in December 2021. Subsequently, there were some issues with implementation in departments. The 2019 Bush House incident and a feeling of surveillance was cited as a reason and, in general, is thought to be having an impact on how the university is considered in relation to the Prevent Duty. The matter was escalated to the Prevent Lead in April 2022 for advice on the approach moving forward. A meeting was held, and an approach has been devised to allow for some local management, providing appropriate records are maintained and researchers are effectively supported. Sign off for this is pending.

Guidance has been issued to confirm that any Security Sensitive Research should be conducted using a King's device rather than on personal devices. IT staff that answer queries about this through 8888 have been advised to direct the student/staff member to Research Governance for further advice about their research, including any mitigations or support that may be required. Resources on Prevent and ICT policies were released by the government in October 2021. The resources cover IT acceptable use policies, the use of web filtering and security sensitive research. Regular review of the university's stance on web filtering is recommended and it is suggested that this is done annually as part of the review of the Prevent risk assessment. The university's current stance is that no web filtering is in place.

Section 2: Data Return 2021/22 (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	1	1	2	0	4
ii) Number of Prevent-related cases which led to informal external advice being sought from Prevent partners	1	1	1	0	3
iii) Number of formal external Prevent referrals	0	0	0	0	0

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.

The Student of Concern (SOC) Procedure is the single point of referral for members of the university community to raise safeguarding and serious welfare concerns about any of our students, including those students who might be at risk of radicalisation. The aim is to have a robust process for identifying students at risk and providing timely and consistent support. Referrals can be made by staff, other students, third parties, or students themselves. The procedure is fully online, and support is coordinated by the SOC Management Group, which brings together staff from multi-disciplinary backgrounds.

5 SOC referrals that related to risk of radicalisation were received. The SOC Management Group assessed the referrals and deemed that one of these referrals was without merit, but further support was provided to the student for other vulnerabilities. The origins of concern for the four other referrals were as follows:

1. Concerns raised from within student body about a student exhibiting hate speech on social media
2. Concerning views expressed in an assignment (2)
3. Behaviour online giving cause for concern

For one student, there were significant concerns regarding possible risk of harm to others and a report was made directly to the Police, who took no further action. After further internal investigations, it was agreed that the concerns raised lacked substance and no further action was required.

The SOC Management Group referred the three remaining students to our DfE Regional Prevent Coordinator for further advice. The College was advised to support broader vulnerabilities for these students using our Student Services. One of the students also had a staff capacity as a teaching assistant. The student was initially suspended pending internal investigations and guidance from the DfE. It was confirmed that no further action was warranted, and support was provided to the student/staff member.

Events and Speakers Approved	
Dataset	
a) Total number of events or speakers approved through the external speakers process	413
b) Total number of events or speakers approved subject to any mitigations or conditions	14
c) Number of events or speakers approved subject to any mitigations or conditions due to Prevent-related risk	0

Events and Speakers Rejected					
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
For each case, please add information about the reasons for rejection where that rejection was for reasons related to Prevent risk. Maximum 300 words.					
No events or speakers were rejected in 2021/22. The process for dealing with External Speakers remains robust and 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.					

Training	Number
a) Number of staff identified as key in relation to the Prevent Duty	384
b) Number of key staff receiving induction Prevent training	116
c) Number of key staff receiving refresher Prevent training	44
d) Number of staff receiving broader welfare/safeguarding awareness training/briefing	160
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)	

Safeguarding and Prevent training was delivered to **264** staff members this year either through a face-to-face session or through an e-module.

142 staff members received face to face training via Microsoft Teams on Safeguarding and Prevent. 44 staff members received refresher training and 98 received induction training. This included Lead and Designated Safeguarding Officers, Faculty Welfare Advisers, Student Services, and Senior Tutors.

An e-learning module entitled 'Safeguarding at King's' was produced at the start of the 2019/20 academic session; this includes a section on the Prevent Duty and the university's Student of Concern Procedure as well as wider Safeguarding awareness training. Access to this module has been granted to key staff, including safeguarding officer role holders and senior tutors, as well as on request. In the period between 1 August 2021 and 31 July 2022**, 122** staff members completed the module and passed the end of module assessment. 18 staff members are considered "key" and are captured under item (b). 104 of the 122 staff members not identified as key to Prevent have completed the e-module and are captured under item (d). Positive feedback on the e-module has been received and arrangements have been made for the e-module to form part of the annual induction training for several departments moving forward.

56 staff members in Widening Participation and Security received broader welfare and safeguarding awareness training this year.

Section 3: Prevent Declarations 2021/22 (to be submitted to the Office for Students)

Throughout the year and up to the date of approval, **King's College London:**

- 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 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	The Rt Hon the Lord Geidt GCB GVCO OBE QSO FKC
Title	Chair of King's College Council
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 the appropriate 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.

Audit, Risk and Compliance Committee	
Meeting date	08 November 2022
Paper reference	ARCC1122J
Status	Final
Access	Members and senior executives

Annual Statement on Research Integrity

Action required

☒ For approval or recommendation
☐ For discussion
☐ To note

Executive summary

The College is a signatory to the Universities UK Concordat to Support Research Integrity. As part of its commitment to this Concordat, the College is required to submit an annual statement on research integrity to the Concordat's Secretariat. This statement must include: a summary of actions and activities undertaken in the previous year to support and strengthen understanding and the application of research integrity issues; confirmation of a procedure to deal with allegations of research misconduct; a high-level statement on formal investigations of research misconduct over the last 5 years, to include outcomes; a statement on learnings from formal investigations; and a statement on how the institution create and embeds a research environment in which all can comfortably report instances of misconduct. This present statement relates to the period September 2021-August 2022, with the reported misconduct cases for August 2021-July 2022. The statement incorporates more local activity around research integrity, so provides a more comprehensive overview than previous years' statements.

This statement was considered by the College Research Committee at its September 2022 meeting. Feedback was given to review the College's REF submissions in relation to the UoAs environment statements, where research integrity activity was reported. Minor updates were made and given Chair's approval on 11 October 2022.

The statement must be posted on the institutional web pages and must also be approved by the institution's governing body before being published.

Members of the Audit, Risk and Compliance Committee are requested to consider the Annual Research Integrity Statement and recommend it to the College Council for final approval.

King's College London's Research Integrity Statement, 2021-2022[3]

Introduction

As a world-leading, research-intensive institution achieving [excellent results in REF 2021](#), King's College London is committed to ensuring that the research conducted by our staff and students is consistently of the highest quality and conforms to the most rigorous standards. The proper conduct of research requires all our researchers to uphold certain principles and professional responsibilities to ensure integrity in the work they do and in the behaviours they exemplify. This is important to instil confidence in academic communities, funding bodies, and the public that the data, findings, and results produced by our researchers are reliable and trustworthy.

The Research Integrity Office (RIO) is committed to the promotion of good conduct and integrity in research and to supporting the university's research community (to include any individual engaged in research in King's name) through the provision of training and guidance, as well as the development of policies and procedures, in order to safeguard public trust in all our research. We expect that all research undertaken at King's, whether by those at the outset of their academic journeys or by more experienced colleagues, is conducted with the core values of research integrity in mind, to produce research of the highest standards. The principles of honesty, rigour, transparency and open communication, care and respect, and accountability are key to maintaining research integrity at King's.

This statement on research integrity at King's College London relates to the period September 2021 to August 2022 and has been drafted to fulfil our obligation to commitment 5 of the [Concordat to Support Research Integrity](#).[4] Previous years' statements have focused primarily on the actions and activities undertaken to support and strengthen an understanding and the application of research integrity issues by the Research Integrity Office and, where relevant, the wider team of Research Governance, Ethics and Integrity (RGEI). In the 2020-21 annual statement, we included select initiatives brought to our attention through our local partnerships as part of a commitment to highlight the range of ways in which research integrity is embedded within various practices and cultures at King's. As identified in our [previous annual statement](#), this year we have adopted a more systematic approach for reporting to ensure an accurate reflection of the full range of activities that promote and embed research integrity across the College. However, this statement does not attempt to identify all research integrity related activity coordinated across the institution as a whole, but rather aims to capture the breadth and depth of our initiatives coordinated both centrally and locally.

Resource

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[3] Presented to the College Research Committee on 27.09.2022, following which minor amendments were made and received Chair's approval on 11.10.2022. Updated version to be presented to the Audit, Risk and Compliance Committee on 02.09.2022.
[4] King's College London is a member institution of Universities UK, a signatory of the Concordat, which we are committed to uphold.

There has been significant increase in resource across King's to reflect an increased awareness and commitment to the broad principles of research integrity. RGEI has been successful in recruiting to a range of new roles. The Research Integrity Office has undergone a restructure, replacing the Research Integrity Officer post with a third Research Integrity Manager (RIM), who takes up post in September 2022. Each RIM will take the lead for research integrity in three faculties, with research misconduct investigations or more complex research conduct enquiries being divided equally. Further changes across the department were made, with a new Research Governance Manager taking up post in November 2021 to support the Head of Research Ethics and Governance (appointed in February 2021) by managing the existing two Research Governance Coordinators and two new Clinical Research Governance Coordinators, who were appointed in January 2022. To address aspects of the Trusted Research agenda, a new International Regulations Manager has been in post since August 2022. A Research England Development Fund award granted in September 2021 as part of our institutional membership of the UK Reproducibility Network (UKRN) will be supporting a new 5-year 0.6FTE Project Coordinator role to strengthen our training around open research and reproducibility.

As reported in the 2020-21 statement, a university-wide Dean of Research Culture has been in post since September 2021, reflecting a wider institutional commitment to supporting research culture. Additional resource in this area has been allocated locally, with the Faculty of Arts and Humanities (A&H) creating a Pro Vice Dean (PVD) for Research Culture (since October 2021), who has been supported by a full-time Research Culture Manager since June 2022. These roles, among other, aim to further embed research integrity training across the faculty and to support the local Research Integrity Advisors in their work. For 2022-23, the time allocation for the PVD Research Culture will be increased to 0.4FTE.

Resource has been allocated to support aspects of research integrity in other areas. Within the Institute of Psychiatry, Psychology & Neuroscience (IoPPN), the staff-led Research & Innovation Committee (RIC) has made available a small fund to support events and finance the Open Research Awards, which were launched in May 2021. 0.1FTE of the RIC administrator's time has been allocated to provide dedicated support to the Research Integrity Champion and Research Integrity Advisors. The Faculty of Social Science and Public Policy (SSPP) has made available a publication subvention to promote open access research, whereby any researcher can apply for up to £2,500 to assist with OA costs. This is additional to any centrally allocated funds. There are also limited funds available from SSPP's Vice Dean of Research and Faculty Research Manager to support with strategic initiatives on good research practices. Within the Research Management and Innovation Directorate (RMID), there is a helpdesk which continues to provide guidance and signpost queries relating to research and innovation management to the appropriate team. The Pre-Award Office within the Research Grants and Contracts team has recruited a Costing Compliance Lead and a Senior Policy Funding Manager, roles that enable compliance and support policy developments in areas related to good research practice.

Online Presence

Our external webpages provide enhanced visibility for our three teams and set out clearly the support offered by the College in the areas of: Research Governance, for all KCL sponsored research with a focus on data protection requirements under the UK GDPR and the DPA 2018; Research Ethics, to ensure that all research activities involving human participants have appropriate safeguards in place; and Research Integrity, in the promotion of the good conduct of research and researchers. The webpages clarify the College's expectations of researchers and describe where to find guidance and support. Pages are updated to reflect our continued commitment to national and international

initiatives, such as the recent inclusion of the Sorbonne Declaration on Research Data Rights. Following the expansion of the Research Governance Office, the [external](#) and [internal](#) pages underwent a full review in March 2022, leading to the publication of new and expanded team goals and remit, specifically around issues of sponsorship and arrangements with our three King's Health Partner (KHP) trusts. Monitoring of our analytics shows that traffic to our webpages is consistent, with page views and visits remaining level thereby showing continued interest in our areas of work. Further support from other central teams includes the [Contracts Team](#) internal pages, where there is information on industry and consultancy funding, data sharing, material transfer, and confidential information exchange. The [Pre-Award Team](#) provides key information on processes and issues for successful grant management. Libraries & Collections offer a [suite of webpages](#) to explain how researchers can engage with 'open' practices with their scholarly outputs.

In addition to the online content reported in last year's statement, the following academic faculties have enhanced the visibility of research integrity. The Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care (NM&PC)has a [page dedicated to research integrity](#), to introduce the topic, identify their local Champion and Advisors, and to highlight relevant sector information.

The joint King's Business School/Dickson Poon School of Law Faculty Research teams have a Research Hub on SharePoint for academic staff across the two faculties. A section on research integrity will be added to this, primarily signposting to resources provided by the RIO and any relevant external information, such as that made available by the UK Research Integrity Office (UKRIO).

The A&H Faculty research pages are in the process of being redesigned, and these will include information on research integrity, also signposting to support available in this area.

Local Engagement

The RIO is responsible for the management of institutional activity, but we rely on academic engagement to support good research practices and raise awareness of research integrity across King's. Our [Research Integrity Champions (RIChs) and Research Integrity Advisors (RIAds) networks](#) continue to provide crucial local advocacy and support for research integrity in each of our nine faculties. Further details of all local role-holders are available [internally](#). We have also published role descriptions and the RIAd recruitment process and nomination form, the latter updated in March 2022 to allow for self-nomination (to include Faculty review). Annual training for advisors continues to be provided, adopting the format of an optional refresher session followed by time dedicated to a pertinent issue. Most recently, this has involved discussions around authorship disputes and consultation on our proposed authorship dispute resolution framework. Recruitment of RIAds is ongoing due to a relatively high turnover in this role. In King's Business School, we have seen an increase in RIAds resulting from an incorporation of this role into the Research Lead position, created for each of the seven research groups in the Faculty. Our RIAds continue to support with informal dispute resolutions, often acting as the first point of contact for researchers, facilitating discussions and encouraging colleagues to contact the Research Integrity Office for further advice and guidance.

Our success in engaging with the academic community is reflected in RIO's review of the UKRIO [guidance on Champions and Advisor networks](#) and the inclusion of our networks as a [published case study](#). Our RIAds have continued to support the RIO with local training (see below for more details) and have contributed to external consultations (as noted below). Faculty colleagues have promoted research integrity throughout the year in Faculty Research Committee meetings, in regular newsletter updates, in departmental/divisional meetings, at grant start-up meetings (A&H), and via social media.

Beyond the more formal networks facilitated by the RIO, there is a dedicated self-sustaining, volunteer-led group of researchers who created the [RIOT Science Club](#) in 2018. Initially based only at King's, this forum for those interested in improving research reproducibility, interpretability, openness, and transparency has now extended to other institutions in the UK and Europe. Over the past year, the wider RIOTS team has organised almost 40 training sessions on a range of topics from open science and the decolonisation of knowledge to building sustainable science. Live participation at these events ranges from 20-100 attendees, with thousands more views on YouTube. Members of the Steering Group recently published Kowalczyk, O. S., Lautarescu, A., Blok, E., Dall'Aglio, L., & Westwood, S. J., 'What senior academics can do to support reproducible and open research: a short, three-step guide', *BMC Research Notes* (2022), *15*(1), 1-9.

Process Improvement

Over the last academic year, the Department of Research Governance, Ethics and Integrity (RGEI) has made a number of process improvements informed by daily practices and experiences of dealing with research governance, ethics and integrity issues.

The Research Governance Office (RGO) has updated and created new guidance to support researchers in relation to governance or sponsorship requirements, including: an update of internal guidance for governance reviews of low- and high-risk healthy volunteer ethics applications (February 2022);the creation of data flow diagram guidance and template (March 2022); the finalisation of guidance on KCL lead sponsored NHS/HSC study funding/study extension (March 2022); the development of templates for KCL sole sponsored NHS/HSC research (March 2022); and an update of guidance on transfer of sponsorship guidance (June 2022). Work is ongoing to develop policy and guidance on Security Sensitive Research, guidance on the use of SITS (Student Information System) data, and guidance on the principles of KCL sponsorship and co-sponsorship with KHP trusts. In June 2022, responsibility for the review of any research Data Privacy Impact Assessments (DPIAs) was transferred from the Information Compliance team to the RGO.

The Research Ethics Office has developed and published the following guidance in the current reporting year: research in schools; updates to social media research; conducting focus groups; remote consent methods; snowballing sampling; and the development of a pre-existing data section in ethics application. Additionally, the College Research Ethics Committee and the Faculty of Social Science & Public Policy have convened a working group to identify opportunities to develop ethics processes and optimise compatibility with evolving social science research.

RIO has continued to liaise effectively with colleagues across the College. The Memorandum of Understanding (MoU) with HR was approved in August 2021. It is supported by a Proforma for reporting instances of bullying and harassment by HR to RIO to enable timely notification to research funders, where required. RIO has ensured that HR colleagues are continually aware of their obligations in respect of this by holding training sessions with the HR Case Management Team (November 2021) and the newly formed HR Employee Relations Teams (July 2022). Training was also delivered to the Student Conduct and Appeals Office (SCAO) in June 2022 and to the Research Grants and Contracts team in May 2022, reflecting a wider interest in research integrity across King's and how it intersects with researcher behaviour and our obligations to research funders.

In consultation with RICHs and RIAds, the RIO developed an authorship dispute resolution framework to support the resolution of disputes that are not appropriate to be investigated under the College's Procedure for investigating allegations of research misconduct. The framework ensures Faculties have ownership over a transparent and timely process for resolving pre-publication authorship disputes.

Additionally, working with our RIAds in the IoPPN has highlighted the need for authorship guidance targeted specifically for Principal Investigators on research grants, supported by training for all relevant staff.

In August 2022, RIO identified the need for improved communication with Libraries & Collections to ensure that the KCL online article repository (PURE) is updated to accurately reflect any article corrections or retractions arising from a research misconduct investigation or enquiry, whether conducted by King's or another third party. Additional process gaps were identified, with resolution in train, including: a more formalised procedure to handle informal conflict resolution, providing guidance to relevant parties on stages and timelines; and a College-level policy for ensuring the appropriate management of research outputs and communication with collaborators upon the departure of a colleague engaged in research (whether through retirement, dismissal, or other). Progress on these will be reported next year. Libraries & Collections are in the process of revising the Research Publications Policy, to include rights retentions in research publications, and the Research Data Management Policy.

Process improvement has also been implemented at Faculty level. In May 2022, the Faculty of Natural, Mathematical & Engineering Sciences (NMES) has created a Research Grant Application Standard Operating Procedure (SOP) in May 2022 to provide standardised guidance on applying for research grants. This is further supported by RMID guidance on submitting an application.

In July 2021, the College published a Declaration of Interest policy and associated documents, which were drafted by RGEI in collaboration with Business Assurance. In this reporting period, colleagues have been made aware of this policy and a process to support it is due to be launched in the academic year 2022-23.

Locally, some faculties have now included research integrity as part of their postgraduate researcher (PGR), new staff or new Principal Investigator induction processes.

Training

With Covid-19 restrictions easing considerably in the past academic year, some in-person training has been delivered. However, online sessions continue to be popular and so much training has continued online. Post-session feedback has remained positive, and is used for content and delivery improvement, where appropriate. Attendance at the RIO introductory Skills Forge session, 'Research Integrity: the fundamentals of research excellence at King's' remains relatively high, with almost 100 participants joining four sessions throughout the year. Additionally, we have delivered focused training to subject areas in 15 subject areas to around 300 academic colleagues and in the region of 60 postgraduate research students. Many of these sessions have been developed in partnership with our Research Integrity Advisors. Across RGEI, a number of independent and joint research governance and research ethics training sessions have also been provided for students and academic colleagues. Collectively, within the reporting period teams within RGEI have delivered around 45 training sessions, to an estimated 1000 attendees. This reflects a considerable increase on last year.

Training in areas related to the integrity of research are delivered by other professional services teams across King's, such as the Centre for Research Staff Development (CRSD) and the Centre for Doctoral Studies (CDS). Research integrity is also integrated within many PGR and Early Career Researcher (ECR) training programmes implemented locally by individual faculties. Libraries & Collections provide training on Open Access publishing and research data management on request, the latter delivered in some joint sessions with colleagues from RGEI. There is additional faculty-based training in good research practices.

In A&H, the PVD Research Culture requested that all departments within the Faculty organise training on research integrity in collaboration with the RIO. Between May and June 2022, training was delivered to almost 60% of departments with commitment from the remaining to schedule this in the following academic year. Initial feedback from these sessions indicates a strong desire for more discipline-specific training and this will be factored into planning for the academic year 2022-23.

The Law Faculty held a small research integrity seminar in June 2022 led by the Research Integrity Champion and RIO, which was attended by colleagues at various career stages. It provided an introduction to the RIO and gave attendees the opportunity to discuss case studies relevant to law, proving an effective way to engage.

NM&PC held a Research Round Up session in November 2021, attended by about 45 staff and PhD students, at which research integrity was discussed along with the Faculty's Inclusive Research Practices Implementation Plan.

Research Culture

RIO recognises that the integrity of research is impacted by the broader research environment. Colleagues within RIO have engaged in national and institutional conversations on research culture, most notably becoming members of KCL's Research Culture Committee (RCC), which met for the first time in November 2021 and has broad representation from the College in its membership. Chaired by the Dean of Research Culture, the primary responsibility of the Research Culture Committee is to advise, through the College Research Committee, on the development, implementation and effectiveness of College strategy and policy affecting research culture and on initiatives required to promote and support a positive research culture. The RCC aims to create a supportive research environment to facilitate: a diverse and inclusive workforce where researchers feel supported enough to reach their full potential; rewarding, purposeful and stable career paths; the value of high standards of research integrity; the support of open research and reproducibility of research; a recognition of the wide range of activities undertaken by researchers which contributes to a positive research environment; and a zero-tolerance approach to unacceptable behaviours, such as bullying and harassment, and fair and effective processes to deal with this when it does arise.

Internal Audits

Demonstrative of our commitment to ensure compliance with Export Control regulations, the department of Business Assurance began an internal review in late May/early June 2022, and this will continue into the next reporting period. The review aims to identify any gaps in our processes and procedures and to implement a plan to ensure that the newly embedded International Regulations Manager has full oversight of all relevant research activity and can provide support and guidance as required.

The Research Governance Office (RGO) continued to conduct random audits of projects registered through the College's Minimal Ethical Risk Registration Process and deal with any breaches of good practice through our 'Supervisor breach of good practice process' and 'Procedure for research conducted without the appropriate ethical clearance'.

External Audit

In the reporting period, KCL underwent an audit from the Wellcome Trust. RGEI contributed to this process in respect of: good research practice policy and training; reporting of bullying and harassment (in collaboration with HR); research misconduct policies, reporting, investigation and escalation framework, and communication to the Wellcome; and ethics approvals in relation to grant set-up. As

a result of the audit, processes are being implemented to support strengthened communications between the RIO and our Pre-Award team in Research Grants and Contracts.

External Engagement

The Research Integrity Office at King's has positioned itself as a trusted team within the wider research integrity landscape. We have contributed to UKRIO consultations on their revised research misconduct procedure and training toolkit. Members of RIO and other colleagues from the King's community attended the UKRIO annual conference in May 2022, with one of the Research Integrity Managers contributing to a subscriber-only session on research misconduct, sharing best practice advice on this topic. RIO has recently taken on a reviewer role for training resources being developed by Epigeum for established research. Along with some of our Research Integrity Advisors, RIO has contributed to national conversations, including the House of Commons Science and Technology Select Committee Reproducibility enquiry and UKRI's Equality, Diversity & Inclusion draft strategy consultation, with institutional responses coordinated by RIO.

RIO continues to work closely with colleagues within the sector, acting as hosts for the proposed first in-person meeting of the Russell Group Research Integrity Forum since the outbreak of the pandemic. Planning for this has taken place in the reporting period, with the meeting scheduled for 8 September 2022. The main topics to be addressed at this meeting are research culture and the trusted research agenda, with KCL presenting on our MoU with HR and our authorship dispute resolution framework.

Engaging on an international level, the two Research Integrity Managers attended the 7th World Conference on Research Integrity in Cape Town, South Africa in May-June 2022. At this event, the team presented their work on liaising with HR through the Memorandum of Understanding (as discussed in last year's statement) and the success of our networks of Research Integrity Champions and Advisors.

In May 2022, the Research Integrity Office coordinated the submission of two applications to the Medical Research Council's Impact Prize through an internal call for nominations, allowing us to promote innovative and impactful research underpinned by principles of equality, diversity, and inclusion.

As an institutional member of the UK Reproducibility Network (UKRN), King's has continued to contribute to the national conversation on research improvement.

As has been previously reported, the Research Ethics Office acts in an advisory capacity to other universities who are in the early stages of establishing an electronic ethical clearance process. This collaboration within the sector has continued in the current reporting period.

Research Misconduct

The College has a formal procedure to investigate and resolve allegations of research misconduct (the 'Procedure'). The Procedure should be reviewed every three years. The current version was updated in December 2020 following approval by the Academic Board. Minor amendments to this were made in January 2022 to reflect more accurately the appeal process, ensuring independence from the Research Integrity Office and Responsible Officer, and to update the role title of the individual responsible for managing appeals. An outcome of the Wellcome Trust audit was to provide indicative timeframes for various parts of the Procedure. These have been added to a proposed update and this version will be submitted to the Academic Board for approval at its November 2022 meeting.

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, has been made available in the event of an appeal.

The College 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, KCL has met such obligations.

Learnings from formal investigations

The Research Integrity Office intends to update the Procedure further, following consultation with the Research Integrity Champions in 2019/20 over proposals to make the College's response to allegations more proportionate and timelier. The proposals resulted from greater experience and knowledge gained from recent, complex cases. Involvement in recent cases has brought to light further key considerations for our new revised procedure. New clauses will be embedded within the procedure that will allow us to address these complexities, for example how to manage appropriately anonymous allegations of research misconduct, and how to work effectively when legal input is sought from any party.

How does King's create or embed a research environment conducive to reporting 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 the College's name.

The process for reporting concerns about research conducted in the College's name is communicated to our research community through our training sessions and is also visible on our webpages. The Research Integrity Office provides assurance to researchers that they should feel safe to report poor research practices, either to us or at local level. The Research Integrity Office 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. In the course of an investigation, we may signpost to mental health support provided by the College to staff and students, where appropriate.

To demonstrate the College's commitment to appropriately signposting and handling all complaints of any nature, including those related to research, a webpage for all College complaints processes is in development and will be made available in the upcoming academic year.

The following summary data relates to cases that have been undertaken by the College under the Procedure over the past 5 years. Other issues relating to research integrity and handled by the Research Integrity Office are not included in this information. Please note that the figures provided for research misconduct are provided for the financial year (August 2021-July 2022), to align with our internal reporting purposes. Data on investigations under the Procedure and issues of research integrity are reported to SMT quarterly within the audit and monitoring section.

Figure 1: Chart showing the number of closed research misconduct investigations by financial year (Aug-July)[5]

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[5] Please note that the chart has been generated from a spreadsheet with the earliest record being the case closed in November 2018. As such, the earlier cases included in the table are not represented.

KING'S COLLEGE LONDON

AUDIT, RISK AND COMPLIANCE

COMMITTEE

ANNUAL REPORT 2021-22

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 2021-22 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 President & Principal 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. The first two meetings of the year (in November 2021 and February 2022) were conducted online, as the university emerged from its lockdown arrangements. The final meeting of the year (June 2022) was conducted as a face-to-face meeting and was held in the Council Room at the Strand campus. There is a strong preference to hold the meetings in-person, since the online meetings were generally considered to lead to reduced interaction and discussion between members. However, overall, it was felt that there was no serious detriment to the quality of the meetings or discussions held on the Teams meetings, and the technology had continued to be consistently reliable. During this year, we paused the informational pre-meetings, which have been a feature of the ARCC in previous years because they are considerably harder to replicate on Teams, although the first meeting of the 2022-23 year, which was held at the King's College London Mathematics School, included a session with some of the pupils of the school.

2.2 At the end of the 2021-22 year, two members left the Committee. Professor Guy Tear had to step down as the staff member appointed from College Council, as he was no longer a member of Council. This position will now be taken by Professor Kim Piper. Mr Adrian Signell also stepped down from his position as student member on the committee, as he has completed his studies at King's and is no longer eligible to fill the position. Interviews for this role were held recently and the position will be filled by Ms Julie Moonga, subject to final recommendation by the Governance and Nominations Committee and approval by College Council. The Committee has yet to fill the vacancy created by the departure of Ms Ros King at the end of the 2020-21 year. We still seek to appoint another independent member of Council in addition to the Chair and Ms Lan Tu.

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 interim Assistant Director of Business Assurance (Audit), 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 between the Chair of the ARCC, the Deputy College Secretary & Chief Compliance Officer and staff in the Business Assurance function.

2.4   The Chair was also in regular contact with senior members of the Executive outside of the ARCC meetings, most particularly the Principal, the Senior Vice President (Operations), and the Vice-President (Finance).

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 (July 2022 and October 2022). The Enterprise Risk Management sub-group is due to meet next with management in December 2022.

2.6   The Committee has also had the opportunity to review the university's purchasing arrangements, in June 2022, with the Chief Procurement Officer through her presentation of the Annual Procurement Report. This is a key part of its broader assessment of the approach to the achievement of value for money. Matters concerning internal controls, governance and arrangements to support data quality have principally been discussed with the ARCC through the reports of the Business Assurance function, and in discussions with senior managers who have presented to the Committee on particular areas of interest.

2.7   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 OfS Conditions of Registration, the Prevent Duty and legislation relating to the College's responsibility toward ensuring democratic processes in the Student Union.

2.8   The termly Compliance Report is underpinned by a programme of independent assurance reviews carried out by the Department of Business Assurance. This programme of reviews is determined on a risk basis, with areas of higher risk being prioritised for review. The Committee also receives a number of annual reports in relation to compliance, including the annual report of Health and Safety Services 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 continues to engage with the Directorate of Strategy, Planning and Analytics (SPA), which is the department within the university which has responsibility for Enterprise Risk Management. This is achieved by occasional meetings between the relevant staff from SPA and the independent members of the ARCC outside of the usual schedule of committee meetings in order to undertake a more in-depth evaluation of the processes by which risk is managed within the College. The Chair of the ARCC has met during the year with the Director of SPA and the Director Strategy to discuss the university's progress in this respect also. This helps the growth of expertise within the university by exposing key staff to the experiences of ARCC members who have worked in heavily controlled risk environments. The ARCC noted that evidence of the growth of capacity within the university in this important area had been demonstrated most clearly to the Committee at its November 2022 meeting. The Committee remains engaged with management in the expectation that evidence of further embedment of risk management as a discipline will be forthcoming over the next twelve months.

3.2   The Director of SPA has reported to ARCC on the embedment of processes to manage risk effectively at the university at each meeting of the Committee during this year. This remains a standing item the agenda for every ARCC meeting.

3.3   In addition to these general risk management discussions, 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 Committee received a general summary of the position with regard to cyber security at its meeting in June 2022 and has followed up with a sub-group undertaking deep dive discussions with management around the university's arrangements in July and October. Overall, the Committee was satisfied that the

university had invested resources in the right areas to protect itself from cyber-crime, but there was more work to be done on keeping its ongoing risk evaluations, and corresponding responses, up to date.

3.4   Another area of significant focus for the ARCC has been on the management of risk in relation to capital programmes and projects. This began in 2020, when the Chair of ARCC requested that a high-level audit review of the university's arrangements for managing capital programmes be undertaken. One of the resulting recommendations was for the creation of a post of Portfolio Director, which would take a view of project management across the entire institution. An appointment was made to this post in late 2020 and the post holder now attends all ARCC meetings. A specific thematic discussion on risks to capital projects took place at the ARCC meeting in February 2022, and a dashboard of project risks, controls and mitigations was discussed at the November 2022 meeting, with a view to this becoming a standing item for ARCC meetings going forward. The Committee has welcomed the development of this dashboard view and will provide a level of scrutiny over it on behalf of the College Council.

3.5   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:

- **Financial sustainability**
  In November 2021, the ARCC received a presentation on the Size and Shape project, through the lens of financial sustainability. It was noted that the College had passed its student numbers growth target for 2029 in that admissions cycle, but it has not reached its target for income and operating surplus. Size and Shape had been the quantitative planning framework used by the College, which laid out at a high level a plausible 'central case' for how King's would look as a university in 2029. The central case sought to optimise outcomes for King's within the constraints of the funding model that it operates within, however, it had been paused and the university was now proposing to restart with an adjusted model to take account of blockages and stubborn issues. The conversation with ARCC was to provide assurance to members about how the Executive were looking at this. The assurances included that the College would articulate why it was important to create the headspace to invest, as well as communicating the reason why there is a new confidence in the emergence of the College from the pandemic period. It was noted that roles and responsibilities were becoming clearer and that financial sustainability and the need to invest in the refresh were central to the success of the strategy. Several challenges were noted, including that the university has reached its size objectives for 2029, with only 2.7% surplus in hand. This illustrated the size of the challenge and management observed that meeting it would not be straightforward.

- **Management of capital projects**
  The Director of Portfolio reported that significant progress had been made around arranging the project portfolios in Estates & Facilities and IT. These are the two largest project areas of the College. Standard approaches were now being taken to the model of project management utilised by the College, especially around trend analysis for risk management, and gateways and approvals, which were all shared with the members. The Committee noted a number of very positive developments following a Business Assurance review of this area, including the strengthening of the number of senior representation and improved training for individuals involved with projects and boards. In terms of governance, the launch of the Portfolio Governance Arrangement (PGA) would provide stronger prioritisation setting within the wider context of portfolio and strategy and would establish a number of gateways. The Director of Portfolio was working with the Deputy College Secretary on developing a method to formally close the loop around each major project by identifying the benefits realised and recording important lessons which have been learnt during the lifetime of each project. Discussions were also taking place about the potential for increasing the amount of assurance work undertaken on projects which were "in flight". Standard reporting methods would be developed, including a dashboard which could be regularly shared with ARCC and reported to Council. Members

of ARCC noted that they were much assured by the progress which had been made, and eagerly awaited seeing the results of further developments and improvements.

- **The development of the people and culture strategy**
The Senior Vice-President (Service, People & Planning) reported that the Culture and People strategy would be established as a strand of the strategy refresh. There were a number of emerging risks, including inflationary costs pressures, global mobility, recruitment and retention. Developing this strand of the strategy involves the identification of the key risks in relation to people and going forward it will be important to provide an update to ARCC on how those risks are being managed. More broadly, though, a need to develop a dedicated workstream in the governing structure of the College, under the Council, for this strand of the strategy has been identified. The Council is, therefore, in the process of establishing a standing committee for culture and people. There will be some overlap with the work of the ARCC, most notably in the area of risk and the area of compliance relating to Health & Safety. The ARCC acknowledged that risk, compliance and regulatory matters would be the main areas of overlap, but the consideration of improvement measures within the College would be firmly within the remit of the new committee rather than a concern of the ARCC. Members of the ARCC expressed their support for the development of the new committee.

- **Fundraising risks**
The Executive Director of Fundraising & Supporter Development (FS&D) reported on the management of risks which can impact on the effectiveness of fundraising. The King's model of fundraising is unique because it incorporates some of the hospital charities from within the King's Health Partnership. This is complex but comes with huge benefits. The fundraising goals were set over four years ago, and there would be some justification for revisiting them to ensure they are realistic, as it may be sensible now to increase the targets. The major challenge over the past three years has been the COVID pandemic and the political upheaval in Hong Kong, which had always been a good source of major gift donations. However, the team had responded well to the changes in donor patterns. King's has a good track record of securing principal gifts, which are at the higher level. Other challenges were noted as understanding where to target effort and resource and the mutuality of interests between the partners. In the latter case, it was difficult to find synergies across the full King's Health Partnership. However, it was noted that the model does work, because if all of the partners were fundraising individually, there was the potential for constant conflict over who should be approaching which donors. Overall, the Committee noted that the risks appeared well managed.

- **Reputation management**
The Director of Strategic Communications presented an update on threats to the reputation of the College. It was noted that maintaining a positive reputation was not the responsibility of a single person within the organisation, but the responsibility of the whole leadership. The Corporate Communications team at King's is a relatively smally unit, but on the whole the Director of Strategic Communications considered that they deal well with reputational threat. As an example, it was noted that the decanting of an entire hall of residence at Christmas 2019 due to fire safety concerns had been handled in such a way that it only received positive news coverage. This was considered quite remarkable in the post-Grenfell context. The understanding of reputation risk is a mature one, and the approach taken to managing the risk is holistic, involving a number of other areas of the College closely, most notably Strategy, Planning & Analytics and Resilience. The key areas of the College's activity which have a bearing on reputation are student experience, staff morale, international exposure and philanthropic donations. Significant investment has been made in online monitoring that gives early warnings. The College has attempted to get an accurate picture of how it is perceived, both by internal stakeholders, but also by the public in general. The Committee noted that these risks also appeared to be well managed.

3.4   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.

4.   INTERNAL ASSURANCE PROGRAMME

4.1   Following on from the pandemic period, during which the internal assurance plan had been proposed by the Business Assurance team and approved by the Audit Committee on a termly basis so as to remain flexible, we returned to a set plan for the 2021-22 year. Despite a certain amount of staff turnover in the Business Assurance team, the plan was delivered successfully.

4.2   During the year, 38 internal assurance reviews were completed. This included two reviews which were led by PA Consulting as part of the IT Assurance Programme, nine reviews which were undertaken as part of the Compliance Assurance Programme and two reviews which were undertaken on behalf by the Information Governance team on areas related to data governance in research.

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 2021-22 year (ARCC1122O). In the 2021-22 year, the Business Assurance team also started to create a regular report for the Principal's Senior Team (PST) on all incomplete audit recommendations, with a PST member allocated to each recommendation as sponsor. In this way, the Principal is able to take a view on all of the outstanding recommendations, and to close the loop on all actions from the Business Assurance audits which have been agreed by ARCC.

4.4   The Business Assurance team is able to take a matrix approach to providing assurance to both governors and management of the university. The majority of work is performed through the internal audit team, which concentrates reviews relating to risk, control and value for money. However, other parts of the team, contribute significantly in the areas of information governance, research assurance and compliance. This capability has been enhanced in the 2021-22 year by the addition of a role concentrating on Information Security assurance. The Associate Director of Information Security Assurance was appointed in February 2022 and has been able to contribute heavily to the IT Assurance Programme undertaken by PA Consulting. The Internal Audit team has been led by the Senior Internal Auditor on an interim basis during this year. A permanent appointment will be made before the end of the calendar year.

5.   EXTERNAL AUDIT

5.1   Ms Fleur Nieboer reported on the annual external audit at the November 2022 meeting of the ARCC. At that meeting, it was noted that the ISA260 was still in draft form, since there were still some minor audit tasks to perform or complete, but the audit was expected to conclude without any issues. In terms of the significant audit risks identified in the scoping of the audit, it was reported that there were no significant issues with the management of income from research grants and contracts, the valuation of land or the valuation of the USS pension liability. The audit had found no indications to suggest that controls had been overridden management at any point and it was noted that access and participation expenditure had been made appropriately. Following an audit challenge, management had made a change to the accounts to recognise a material impairment to the Champion Hill Buildings of £20m. Ms Nieboer observed that the auditors' work around going concern was well progressed and no significant or material issues had been noted. The auditors were, so far, content that all appropriate forecasting and stress-testing had been undertaken.

It was noted that three areas had been close to materiality, and the external auditors had taken some time to be comfortable about the judgements and assumptions used. These areas were:

- Global Mobility, where additional care had been taken to understand the implications of tax liabilities abroad

- The Pearson contract support the provision of online education, where the auditors had taken time to understand the basis of the decision and the accuracy of the judgements

- The Champion Hill buildings, where the auditors have agreed with management that impairment of the buildings is the most prudent approach and most accurately reflects the position at the end of the year.

One recommendation was made about more timely bank reconciliations. Management had already responded to this point and noted that the previous delays observed by the audit were due to the long-term absence of a key member of staff.

Ms Nieboer reported that the auditors were comfortable that the College complies with the OfS Accounts Directive in relation to the use of funds. She also confirmed the independence of the auditors and briefly summarised the KPMG fees, including those for non-audit work.

5.2   During the 2021-22 year, KPMG carried out five separate non-audit exercises for the College at a total cost of £42,450. Three of these exercises related to advisory tax matters and totalled £19,500. The other two items related to statutory and compliance exercises around corporation tax compliance and the statutory iXBRL return (HRMC Company Tax Return). All work was approved locally in accordance with the ARCC Terms of Reference and was passed through the KPMG ethical review processes.

6.   COMPLIANCE

6.1   A full 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 each of its meetings during the year. The report presents a largely management view of the legal and regulatory compliance landscape, whilst the Compliance Assurance Programme is designed to give an independent view of that assessment and is supported by an assurance map, drawing on a number of sources, which also sets out the risk assessment. Three news areas of compliance were added during the last year. These were, Export Controls, National Security & Investment Act compliance and Global Mobility compliance with overseas jurisdictions. In all, 30 areas of compliance are now considered, including areas such as the management of the OfS Conditions of Registration, Equality and Diversity duties, employment law, anti-money laundering responsibilities, Human Tissue legislation and regulations relating to the use of animals in scientific procedures, fundraising and compliance with the 1994 Education Act provisions for governance of student union activity.

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   One external report, from KPMG, was received in relation to the university's compliance to research funder compliance. This report found that the university was operating well in relation to quality-related research charity support funding. Several other compliance-related internal reports were presented to the Committee during the year. These included:

- The Annual Report of the Director of Health and Safety
- The Fundraising Ethical Review Group annual report
- The Freedom of Expression Standing Advisory Group annual report
- The Prevent Annual Statement
- The Research Integrity Annual Statement
- Safeguarding annual report

The Chair of the ARCC has related the key points of these reports to the College Council for its consideration during his regular reports during the year. No serious adverse matters were reported to

Council, although the ARCC had continued to monitor one particular issue in relation to an HSE investigation into a case of occupationally acquired asthma at the university. At the time of writing this report, the university was informed that there would be no prosecution of the matter.

6.3   Overall, the compliance landscape was considered to be well managed, despite challenges from regulatory change, such as the introduction of more onerous export controls on the sector. Currently the Committee regards the most challenging regulatory environments to be those connected with visa management for both students, and the management of research facilities which are licensed by the Home Office. 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.   VALUE FOR MONEY

7.1   As part of its remit around risk and value for money, the ARCC had the opportunity to discuss purchasing matters with the Chief Procurement Officer. At its February 2022 meeting, the Audit, Risk and Compliance Committee noted the update report on the strategic improvement plan put forward by the Chief Procurement Officer. The Chief Procurement Officer attended the meeting to answer questions from members and to present the next steps for the ongoing Procurement Improvement Plan.

7.2   Overall, it was observed that there had been a reduction in spending with third parties over the past year, resulting from the creation of a community of procurement practice throughout the College. Another significant step forward had been taken in appointing a dedicated travel manager. This was an area of considerable spend for the College and this appointment is expected to deliver significantly increased value for money in this procurement category with a rapid pay-back period. Progress was also noted in the promotion of sustainable procurement and social value.

7.3   It was noted that the key objectives for the year going forward would be the creation of a Procurement Centre of Excellence, which would have a better structure in place than currently for reviewing contracts, would have more customer focus and would provide a more specialist service to the College. In terms of maintaining business with preferred suppliers, it was observed that no purchaser at the College can buy any item over £50k, which means that the use of preferred suppliers is always enforced at the upper end of the spending bracket. At the lower end, controls are being put in place and a proactive education campaign is ongoing. Improvements are being seen at the lower levels of spending now, also. Suppliers are regularly reviewed and there is visibility of which suppliers are particularly critical to the College's supply chain. The Committee noted that a process of improvement was also underway in relation to the database of suppliers. Increasing proactive contract management was also a goal for the Procurement team in the 2022-23 year. This would include reviews with vendors to ensure they are delivering what the College expects will be central to any improvement in contract management.

7.4   Members of the ARCC were assured by the positive messages which the Chief Procurement Officer was promoting around the pursuit of excellence in sustainable and ethical procurement. The Committee encouraged the College to use these examples in its outbound communications, as they could be viewed as very inspiring by young people who were making their choice of university.

8.   CONCLUSIONS

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

8.2 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.

8.3 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 2022.

8.4 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.

8.5 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.

8.6 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.

8.7 In this respect, the Committee was able to endorse the university's statement of internal control for the financial year 2021-22.

8.8 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.

8.9   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.

8.10   ARCC continues to support strongly the improved framework proposed and partially implemented by executive management that separates out more clearly risk management from risk governance/assurance roles. There is still more bedding in required and the ARCC risk management sub-group will continue to engage in the coming year with executive risk management to satisfy itself with regard to plans to enhance risk management culture, structure, process and pace of change.

8.11   ARCC remains of the view that a Board Assurance Framework methodology is the right medium-term aspiration for King's College London.

Mr Paul Cartwright
Chair – Audit, Risk and Compliance Committee
King's College London
November 2022

MANAGEMENT REPRESENTATION

Report for Members of Audit, Risk and Compliance Committee

1) This report has been prepared by the University Executive for Members of the Audit, Risk and Compliance Committee in order to assist them in providing an opinion on the adequacy and effectiveness of the university's arrangements for risk management, control, governance, data assurance and value for money.

2) In order for Members to receive the required level of assurance in giving this opinion, the University Executive has made the following representations:

- Law and Regulations – we are not aware of any actual or potential breaches of laws and regulations, other than those reported to the Audit, Risk and Compliance Committee and/or Finance Committee, which could have a financial impact on the Financial Statements for the year ended 31 July 2022.

- Fraud - we are not aware of any actual or suspected frauds, other than those reported to the Audit, Risk and Compliance Committee and/or Finance Committee, which could have a financial impact on the Financial Statements for the year ended 31 July 2022.

- Related Party Transactions – we confirm the completeness of the information provided to the external auditors regarding the identification of related parties and regarding transactions with such parties that are material to the Financial Statements. The identity of, and balances and transactions with, related parties have been properly recorded and, when appropriate, adequately disclosed in the notes to the Financial Statements. We are not aware of any other such matters required to be disclosed in the financial statements.

- Internal Control – we confirm that a generally effective system of internal control has been in operation throughout the year to 31 July 2022. A small number of areas have been identified where there have been control failures or established controls have operated sub-optimally. In these events, the issues have been reported to the Audit, Risk and Compliance Committee and, where appropriate, College Council. In each case, steps have been taken to mitigate the effect of the failures and prevent recurrence.

- Risk Management – Management have kept the key risks to the university in view throughout the year to 31 July 2022. An improvement process continues to be embedded for the formal recognition and reporting of corporate risk management activity.

- Data integrity – any identified breach of data to the year end 31 July 2022 has been handled in accordance with the relevant university policy. No cases have required reporting to the Information Commissioner's Office. This remains a key area of focus for senior management.

For and on behalf of the University Executive

November 2022

Audit, Risk and Compliance Committee	
Meeting date	08 November 2022
Paper reference	ARCC1122G
Status	Final
Access	Members and senior executives
FOI release	After subsequent committee

Internal Assurance Service Annual Report 2021-22

Action required

☐ For approval
☐ For discussion
☒ To note

Summary

The annual report of the Business Assurance team is provided for members of ARCC to help arrive at their annual opinion for the Principal and College Council. Whilst it is no longer a mandatory requirement under the OfS Terms and Conditions of Funding, the Department have maintained the custom as a matter of good practice.

BUSINESS ASSURANCE REPORT 2021-22
EXECUTIVE SUMMARY

1. This report reviews the internal assurance work of the Business Assurance Department of King's College London for the financial year 2021-22 and comments on significant issues identified to date.

2. The Business Assurance Department is part of the Office of the Chairman and the College Secretariat (OCCS). The Department is made up of teams which focus on risk and control assurance and value for money auditing, compliance assurance, research assurance and information governance and security assurance. The Department also assists with a variety of internal investigations and ad hoc lessons learnt work. It reports to the Deputy College Secretary & Chief Compliance Officer, who has rights of direct access to the Chair of the Audit, Risk and Compliance Committee (ARCC), the Principal and the Chair of Council on audit matters. These rights of access have not been exercised during the year, although the Deputy College Secretary & Chief Compliance Officer has continued to have regular discussions with the Chair of ARCC through the year as part of a continual communication process.

3. During the year, 38 audit and assurance reviews were completed by the Business Assurance Department, including two technical IT audits undertaken by a third party which were closely supported by the department. We also supported an external funder audit from the Wellcome Trust (WT) this year and have been significantly engaged in follow-up work and liaison over recommendations following this visit. Similarly, the Research Assurance team continued to engage with the UKRI throughout this year, following their Funder Assurance visit in 2019. The UKRI formally notified the College that they were removing special measures on our grants in October 2022. A full note is included in the November 2022 Compliance Report (ARCC1122P).

4. The assurance programme in 2021-22 has included a range of work aimed at informing the ARCC's assessment of the effectiveness of internal control systems, management of risk and governance. We have also undertaken a programme of work aimed at providing assurance on legal and regulatory compliance matters. Across the whole range of assurance exercises, we have noted that where weaknesses were identified, managers have engaged with a process of improvement based on the remedial actions we have recommended. This process has been further supported by the Principal's Senior Team taking a closer interest in the closure of audit recommendations.

5. Our programme of IT Assurance has been further enhanced by the recruitment of the Associate Director of Information Security Assurance who is engaging with colleagues in IT and PA Consulting. A key focus for the role in the coming year will be to audit against the embedment of the *Code of Connection* for IT devices across the university.

6. *Internal controls are generally considered to be adequate and effective, although audit work this year has identified some control weaknesses. Where issues have been raised, management are willing to engage and consider improvements. There is evidence to support the conclusion that value for money is sought in the management of various activities and the Chief Procurement Officer pursues a programme of continuous improvement in this respect. Governance arrangements are also considered to be adequate and effective, with the effectiveness of the ARCC having been reviewed this year. The arrangements for managing the risks attached to specific work packages are generally considered to be adequate and effective, however, work is underway to improve the processes by which risk is monitored, mitigated and reported more broadly throughout the institution.*

Paul Mould
Deputy College Secretary & Chief Compliance Officer
November 2022

KING'S COLLEGE LONDON

ANNUAL INTERNAL AUDIT REPORT 2021-22

1. INTRODUCTION

1.1 This report reviews internal assurance undertaken by the Business Assurance Department of King's College London for the financial year 2021-22 and comments on significant issues identified to date.

1.2 The Department of Business Assurance consists of a team of three auditors who focus on reviews relating to the internal control environment, risk and value for money. This capability is augmented by independent assurance work undertaken in other parts of the of the department, where there are specialist skills in compliance, research, information security and data governance. We are planning to introduce a project assurance specialist in the 2022-23 year. For the 2021-22 year, we had a capacity of around 4.5fte concentrating on assurance reviews to both support the improvement agenda of management and to provide information for governors. The staff complement for internal assurance work at King's is made up of senior graded staff, all at Grade 7 and above. We consider the specialist assurance provided the university across a matrix of skills within the department establishes a strong foundation for the internal assurance service at King's.

1.3 The ARCC approved the Internal Audit work plan for 2021-22 at its June 2021 meeting.

2. ACHIEVEMENT AGAINST PLAN & AUDIT TEAM OUTPUTS – 2021-22

2.1 The usual broad range of reviews were undertaken during the year, and members of the ARCC have been able to draw on the outputs of these audit reviews to help in forming an overall opinion of the strength of the system of internal control, the adequacy and effectiveness of risk management, governance and data integrity, and the processes in place to achieve value for money.

2.2 A summary of all reviews conducted by the Business Assurance team and reported to the Audit, Risk and Compliance Committee over the year is found in Appendix A, organised into the following categories:

o **Financial management & internal control**
Work in relation to both financial management practices as well as the assessment of key controls has concentrated largely on central processes this year. Reviews included, Treasury Management, TRAC Resilience, Occasional Payroll, Student Debtors, Capital Accounting Arrangements, Scholarships and Student Support, with Faculty Reviews focussing on the SSPP and the King's Business School. Key controls were found to be working well in Treasury Management, Journal and Suspense Accounts, Student Debtors and the King's Business School. Improvements were considered necessary in the payroll reviews, TRAC, SSPP, Capital Accounting and Management of Scholarships and Bursaries. Follow-up work has shown work is underway to make the improvements identified in a number of these areas.

o **Strategic & Operational Management**
A number of reviews were carried out during the year associated with the College's arrangements to support its strategic goals and to evaluate non-financial operational management. These included reviews of Examinations and Assessment, Widening Participation, King's Online, Organisational Development, Sports and Fitness and the Management of Intellectual Property. Reviews of risks management, widening participation

and intellectual property management found good controls and adequate measures in place. The review of Organisational Development noted that the OD department worked well and provided good value for money, but many of the organisational mechanisms for development were disjointed and sub-optimal. The other reviews included a number of recommendations for remedial actions. We can confirm that improvement work is underway now by management in all areas we reviewed.

- o **Compliance Assurance**

    The Compliance Assurance programme this year has included reviews of consumer protection regulations, modern slavery, student visa management the conformity of the ARCC to guidance produced by the Committee of University Chairs and export controls. In general, the reviews noted a high degree of compliance to regulatory and legislative requirements. The only areas which were considered to require improvement were visa management in relation to attendance monitoring and export controls, where improvement is already being seen following the appointment of an experienced manager to a key post.

- o **Value for Money**

    Four specific reviews took place in this category, although elements of value for money were also reported in reviews in the other categories. The reviews undertaken looked at the management of energy, NHS teaching contracts, research grant pre-award costing and the implementation of the Worktribe system in Research Management. No serious issues were found in any of the reviews.

- o **Data Governance and Integrity**

    Two reviews were undertaken in this category, both focussing on data governance in research. We have noted improvements during the year in the management of data in research generally, and this has been achieved by the by the continued support of the Data Governance Group which scrutinises the management of data across the university.

- o **Special Investigations**

    The Department of Business Assurance also conducted two lessons learnt exercises during the year. One focussed on delays in the development of a Containment Level 3 laboratory facility and the other on the failed implementation of a framework for Graduate Teaching Assistants. We also conducted two preliminary investigations following allegations made in public interest disclosures. Neither proved to have sufficient grounds to take further. Over the past year, we have also undertaken work to strengthen the university's counter-fraud posture. More detail will be provided to the ARCC on that work at the March and June ARCC meetings in 2023.

- o **Other audit work undertaken by third parties**

    Only one review was led by a third party. This was the Cyber Security maturity review undertaken by PA Consulting, which concluded that cyber security continues to develop across the university and cyber security capability within King's has developed in its maturity. The department has also closely supported a funder review by the Wellcome Trust and has helped bring the UKRI funder review to closure by managing the recommendation follow-up in support of the funder. We are now managing the same process with the Wellcome audit review.

4. AUDIT OPINON

4.1 There is good evidence that internal controls are generally soundly based, are adequate and in the main operate effectively. Some control weaknesses were identified through audit work during the year for which management have demonstrated a willingness to engage and make improvements to ensure that the overall control environment remains effective or, where appropriate, have provided justifications for accepting risk. The Principal's Senior Team (PST) engages in ensuring audit recommendations are brough to closure, and each recommendation made during an Assurance Review is now given a PST sponsor to be answerable for the appropriate management of that recommendation in the PST forum. The Senior Vice-Presidents are engaged with the process of remediation across a number of areas during the course of the year and receive interim updates on the progress of all assurance review work, prior to its submission to the ARCC. There is also evidence to support the conclusion that managers seek and achieve value for money in the management of their various functions and activities and that the university supports this endeavour adequately and effectively. The College has a dedicated procurement function which was set up to ensure that the best value is achieved from suppliers at all times and is actively engaged in a programme of outreach to strengthen this objective across the institution. From a detailed knowledge and understanding of the governance arrangements operating within the university, as set out in the financial statements for the year ending 31 July 2022, it can be concluded that the university has an adequate and effective system of corporate governance.

4.3 The Audit, Risk and Compliance Committee has been engaged directly with Management with 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 Executive is aware of the need to manage risk effectively and continues to seek to provide an environment which supports the cultivation of an effective risk management culture throughout the organisation. A recent focus on better understanding the way in which operational risks impact on strategic risks provides evidence of a willingness to develop this practice further. Review work carried out by the department during the year suggests that, whilst improvements can still be achieved, there is an overall system of managing risk which is both adequate and effective.

Paul Mould
Deputy College Secretary and Chief Compliance Officer
November 2022

Appendix A – Listing of Audit Reports for 2021-22 with summarised findings and updated RAG ratings, where available.

Listing of Internal Audit Reviews for the year

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
	Financial Management & Internal Control				
1	**Treasury Management**	Nov 2021	This review was commissioned to provide assurance over the processes in place to determine the strategy for the King's treasury activities and the adequacy and effectiveness of the mechanisms in place monitor compliance with it. Key controls and risk management were considered, as well as the relationship with Royal London. The College's borrowing arrangements were also assessed to ensure that they met with policy requirements. Governance over the entire operation was also examined. Systems and processes were found to be satisfactory. One minor recommendation was made in relation to reporting and another in relation to bringing policy up to date with OfS requirements	🟩	🟩
2	**TRAC**	Feb 2022	This review tested the resilience of the processes for providing the statutory return of costing data in two returns, TRAC and TRAC (T), each year. We recommended a number of improvements, including increased communications to facilities in RMID that should be TRAC listed, where there had been no recharge based on the required TRAC calculation, but had been calculated with a lower costing method, thus leading to funds going unrecovered. We also recommended that TRAC costings in faculties should be evidenced as approved or explanation documented as to why the costing has not been used, that VfM indicators should be introduced based on TRAC costing methodology and that sample sizes should be increased. Evidencing of approval of key documents such as the TRAC costings was also recommended.	🟧	🟧
3	**Journals, Suspense and Control Accounts**	Feb 2022	This audit review provided positive control assurance over the processes and procedures operating in the new finance system with regard to journals, suspense and control accounts. The implementation of the new system was found to have had a positive impact in providing a workflow and automation of processes that were formerly carried out manually. The review was able to confirm that the appropriate reconciliations and checks are taking place.	🟩	🟩

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
4	**One-off Payments/Occasional payroll**	Feb 2022	Our audit of the One-off Payments/Occasional payroll identified that significant improvements were required. Specifically, we recommended improvements to details included on payslips where pay varies according to the amount of time worked, enhancements to approval forms and an eventual transition to the Remedy Force ticketing system so that fields can be mandated, and validations utilised. Improvements to Right to Work checks and approval sign off procedures were also recommended. We also suggested that consideration should be given to some policy enhancements with regards to casual staff engagement. In response to these recommendations the Director of People Services has begun an improvement process to consider these issues with the casual payroll and more.	🟥	🟧
5	**Processes for salary payment**	June 2022	This review has considered several functions including HR, Payroll, Finance and local departments in the process for paying staff salaries, recognising that various inputs are essential for accurate staff payments. A review of the authorisation process for extra duty payments was recommended, which has since been done in KBS and SSPP. Reporting will be documented in Payroll and a regular process for updating the electronic HR record will be developed. Non-automated payroll requests will be investigated with a view to moving entirely to Manager Requests. Departments will be reminded about appropriate use of the leavers process. Quarterly reports of access to the Payroll and HR system will be provided including level of access and usage. Local oversight over salary payments was recommended as an additional control, as well as payroll running a monthly report on variances and investigating appropriately.	🟧	🟨
6	**Management of Student Debtors**	Nov 2022	Our review of the management of student debt gave a positive satisfactory assurance over the control environment. We highlighted a small number of recommendations to further strengthen the controls regarding the Implementation of Standard Terms and Conditions around withdrawals and change of circumstances (COC's) and the Student Loan Company (SLC). We also made recommendations relating to the speed of transaction processing and student experience.	🟩	🟩
7	**Accounting for Capital Projects**	Nov 2022	Our review of Accounting for Capital Project reflected the change to a new governance structure since our earlier review in 2020. Findings included that there was no transparent revenue budget for write offs, the Capital Recognition document needs to be agreed before being circulated and adopted, the capital plan gives no information on what completion stage a project is at other than the amount of time and money spent. A confusion over roles and responsibilities around the capital plan and administration was also noted. It was noted that Estates capital projects require a level of granularity to show different depreciation rates relating to different parts of the estate and that there is an expectation that everything related to IT is capital, exacerbated	🟧	🟧

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
			by the lack of an operational budget to write expenditure to. Projects to implement key new systems are not transparent in the capital plan, and cost accountants are not used to support IT projects.	🟧	🟧
8	**Faculty Review - Social Science & Public Policy**	Nov 2022	This planned faculty audit set out to review the financial, HR and systems access processes within the Faculty of the Social Science & Public Policy. We identified several issues during this routine departmental audit. Most significant amongst these issues was a variability in the approach to the management and approval of expenses and oversight of purchasing card transactions. Expenses claims were found to be incomplete in terms of supporting information, this included travel, which did not go through the preferred supplier. Several recommendations were made, and management action plans were agreed for remedial action.	🟧	🟧
9	**Faculty review of Kings Business School**	Nov 2022	The faculty audit of the Kings Business School also set out to review financial, HR and systems access processes in that area. The review found a sound system of internal control and positive management action. These included good controls around purchasing cards, where access to the system is highly restricted and only seven staff out of an FTE of 216 have purchasing cards. Detailed reports are produced on Third Stream ('TS') accounts by the Senior Finance Business Partner and are scrutinised within the faculty. Good access control to systems and property was identified, as well as structured staff leavers processes, which removes access rights appropriately.	🟩	🟩
10	**Scholarships, bursaries & student support**	Nov 2022	The review of scholarships, bursaries and student support considered that some improvements were necessary to systems and processes. A number of recommendations were made, including to identify and formally document processes which were dependent on a key individual, to apply more frequent reviews over transactions and balances with regards to third stream accounts and to review agreements for historical balances on endowments. We also recommended that, once the Terms of Reference for the Studentships Oversight Committee had been finalised, standardised reports on expenditure on studentships should be developed for the scrutiny of that group.	🟧	🟧
Strategic & Operational Management					

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
11	**Insurance arrangements for Research Projects**	Nov 2021	The purpose of this review was to understand the current landscape for research data governance at the College. This was done by engaging with various stakeholders from within the King's research community, to examine the general practices for managing and curating data, to understand sector and industry best-practice and to undertake a gap analysis to identify any areas of weakness. To improve researchers, experience and understanding of their responsibilities it was recommended that a research hub be created with clear information such as a checklist for researchers, guidance on data storage options and outlining the roles and responsibilities of stakeholders of the research community.	🟧	🟩
12	**Engineering maintenance in the BSUs**	Nov 2021	This review focused on the management and maintenance of the Air Handling Units (AHUs) in the BSU at the Hodgkin Building. It was noted that there was a lack of deep expertise in the internal engineering teams which support these areas and a perceived lack of understanding around how important managing the engineering infrastructure is to the maintenance of the Home Office licence to operate these facilities. During the year, recruitments have been made to address the gaps in knowledge within the Engineering teams. The review also made other recommendations for improving the engineering support and processes for addressing faults in the BSUs, which have largely been implemented.	🟥	🟨
13	**Examinations and Assessments**	Feb 2022	This review considered the mechanisms through which students submit assessed work and receive associated feedback. We identified issues with policies regarding Examinations & Assessments that were found to be outdated or not followed, and a lack of documented processes around arrangements during lockdown. Issues that had been reported and escalated had not been addressed, such as the widescale student submission system errors for online examinations, which had been reported without any further investigative action taken. There is lack of a standardised approach across faculties, with few defined roles and responsibilities, and little data enabled reporting to drive KPIs within the faculties and monitor and report key targets. Exception reporting developed by Analytics is not well used across the College. und that data analytics can identify faculties with the most incorrect postings of grades, however this data is not reported or monitored.	🟥	🟧
14	**Timetabling**	Feb 2022	The review focused on the centralised timetabling process, consisting of the four key sets of activity to which the timetable is scheduled, and rooms allocated, including identifying the availability of teaching staff, organising programme modules and student selections, agreeing activities that have to be fixed within the timetable for each programme and the scheduling of all teaching rooms, both departmental and centrally managed facilities. We found a number of issues including a lack of priority and focus on the student experience when scheduling timetabling, an absence of occupancy checks over room bookings, a lack of centralised policies for space	🟥	🟧

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
			management of internal spaces and staff events and few metrics, feedback or KPIs for student satisfaction of timetables.	🟥	🟧
15	**Widening Participation**	Feb 2022	Our review of Widening Participation gave a positive assurance and a satisfactory rating over the procedures and processes. Covid impacts had been well managed and the Access and Participation Plan (APP), which the College is obliged to have in place by the OfS, is well appropriately created and its implementation is effectively governed. The potential impact of governmental student number controls had been appropriately assessed. Importantly, financial commitments established in the 2020-21 APP are being met. Assurance was also provided that Widening Participation remained a scientific priority for the College.	🟩	🟩
16	**Kings Digital Online Environment**	June 2022	This review focused on the governance, challenges, and risk management of the Kings Online programmes. There are currently some major decisions to be made about online provision at King's, and the process to discern the correct way forward was considered to be robust with appropriate involvement of Finance, Legal, the VP (Education) and senior management. Several recommendations were made for improvement, including use of data analytics, the setting of KPIs, updating of the marketing strategy for an international audience and to respond to infrastructure issues in a timely manner. Since the audit, a masterplan has been developed taking into account many of the recommendations.	🟧	🟨
17	**Kings Sports and Facilities**	June 2022	This review found that the recovery of the business from the impacts of the pandemic lockdown, which hit the membership numbers of the gyms and sports facilities drastically, is the key objective of the departmental, which has a goal to operate without a financial deficit and support the universities and communities' sports participation objectives. A number of changes have been made, including the introduction of a new application and online events and initiatives to support the university and students' fitness aims, including Kings Move (App), Active Wellness, Be Active, Gyms and Sports Facilities. Recommendations included to finalise the Business Continuity plan, to perform a benchmarking analysis of other HE and private sector recovery plans and to implement key KPIs to assist monitoring of financial sustainability.	🟧	🟧
18	**Student Representation**	June 2022	This review of Student Representation recommended that there should be greater clarity over roles and responsibilities and that expectations and outputs should also be clearly defined for both the College and the Student Union. It was found that greater use could be made of data, which might require greater capture and improved curation. Consideration should be given to the passing the administrative burden for faculty	🟧	🟧

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
			representatives to the faculties and for KCLSU to assist in developing the guiding principles for elections. It was also suggested that the College may wish to review the attendance of sabbatical officers at senior level university committees in response to the KCLSU review of sabbatical portfolios in 2022-23. It was also suggested that an assessment should be carried out to evaluate the web provision for allowing student feedback across the university. Some recommendations were also made to improve meeting management and preparation.	🟧	🟧
19	**Organisational Development (Training and Development)**	June 2022	We determined that this area required improvement because of the requirement for a number of functions to interact across the organisation. Based on the VfM it provides, the performance of the OD team alone would have been rated as satisfactory. It was noted that OD have a high profile and contributed significantly to the successful transition to home working during the pandemic, salary costs within the unit are very modest compared to their 'reach', and the transition to putting training online and providing digital options was seen to provide particularly good value. However, we noted a lack of strategic vision for staff development in the organisation and a lack of long-term plans and goals for the OD team. Distribution of staff training can also be unequal, leading to equity issues. There is a lack of a training database to record staff training and a recommendation was made to consider implementing the training module in the People XD system.	🟧	🟨
20	**Management of Corporate Risk**	Nov 2022	Our review of the Management of Corporate Risk followed up on the January 2021 review regarding the Financial Risk Management, of which we confirmed that positive processes and structures had been put in place around the management the risk registers, governance and procedures. We gave positive assurance over the risk registers, risk ownership, likelihood and probability ratings, governance, and reporting.	🟩	🟩
21	**Intellectual Property Management**	Nov 2022	This audit review highlighted good procedural documentation, monthly reconciliations between the IP and finance system and good governance processes. Recommendations were made for more emphasis to be given to existing key performance indicators, improvements to be made to administration within the Inteum system, alongside the refreshed Innovation@King's research strategy so that an increased interconnectedness is developed within RMID in relation to the management of Intellectual Property.	🟩	🟩
Compliance Assurance					

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
22	**Compliance with Consumer Protection Legislation**	Nov 2021	This review surveyed the processes by which the College ensures it remains compliant with relevant legislation and provides students with the education is has promised in its advertised prospectus. The impact of the pandemic lockdown on delivery of prospectus promises was also assessed. The review provided assurance that the College is compliant with the legislation and that this remained the case in the circumstances of the pandemic and the adjustments to the delivery model for education. Some areas for improvement in the timeliness and accuracy of information provided to students were identified in the review process. Arrangements to ensure compliance were found to be comprehensive and effective.		
23	**Modern Slavery and Supply Chain Management**	Nov 2021	This review was undertaken following questions from Council members when they approved the Modern Slavery Transparency Statement. The main commitment of the College is to seek assurances that suppliers manage the supply chain in a way that ensures Modern Slavery is not involved lower down the chain. The review tested that these assurances are received and was satisfied with the results. In overall terms this review was able to conclude that the College has put in place measures both to ensure its own compliance with the requirements of the Modern Slavery legislation and has taken and continues to take reasonable steps to ensure that it only partners with, accepts donations from, or contracts with organisations that demonstrate compliance with Modern Slavery legislation. There were no recommendations.		
24	**Compliance with OfS Conditions of Registration**	Nov 2021	The College Council is required to ensure compliance with the OfS conditions of registration, which include a number of matters connected to academic standards. We reviewed a report on the OfS conditions of registration, prepared by the Students and Education Directorate for the consideration of Academic Board and Council. This review work was able to support to the conclusions that the university is compliant in relation to conditions C1 (relating to consumer law), C2 (relating to the handling of complaints) and the conditions listed under section D relating to financial sustainability and the reporting requirements listed in condition E4 and F4. The College is compliant with the Conditions of Registration.		
25	**Compliance with Requirements for Student Unions in the Education Act (1994)**	Nov 2021	A review of this area found that the university and the Students' Union were broadly compliant to the requirements of the 1994 Education Act. This included appropriate governance and election documents being publicly available (including financial statements), the existence of a Code of Practice which supports the good relationship with the College and up-to-date insurance arrangements. Students got notifications about the right to withdraw from KCLSU annually, but it was buried down in a large amount of other information. The process for managing opt-outs appears to be appropriate, but it is little-used. The review raised a question around whether the process for the fair allocation		

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
			of funds to clubs and societies was clearly advertised. Recommendations were also made in relation to this which have been implemented.	🟩	🟩
26	**Student Visa Management**	June 2022	A routine review of this area of activity identified that a number of understandable gaps in the recording of information arose from the period of the pandemic lockdown, but effective remedial work was underway, and the situation was considered to be improving since the return to campus and the restoration of business as usual for the Student Visa Compliance team. This is a crucial area of compliance for the College's ambitions to finance its strategic growth. As a result of concerns expressed by the Management team in SED at the conclusion of this review, a follow-up review was immediately commissioned to look at attendance monitoring, which is summarised separately in this report at line 37.	🟧	🟧
27	**ARCC Conformity to CUC Guidance**	June 2022	This review provided an assessment of the effectiveness of King's College London's arrangements for the oversight and governance of audit via the Audit Risk and Compliance Committee. The College's current practice was assessed against the Committee of University Chairs' (CUC), advisory, *Higher Education Audit Committees Code of Practice,* which identifies the key principles and eight elements that form an effective Audit Committee. In overall terms, the university's arrangements for governance in audit were assessed as satisfactory, although there were a small number of more detailed points where the ARCC was not fully in conformity to the CUC *Code of Practice*. Recommendations were made in these areas.	🟩	🟩
28	**Export Controls**	Nov 2022	The College is operating in an increasingly global capacity with research collaborations involving partners, donors and students from across the world. A key risk is that compliance with legislation around export control and overseas investment may be breached. This review of the current state of compliance management noted that the College is behind its peers in establishing controls to prevent breaches and that support for staff and students working in this area is not currently adequate. In particular, the College is yet to define any policy or procedure around these areas, nor does it communicate advice to stakeholders via its web pages. Recommendations were made to improve engagement through the use of champions to make processes less bureaucratic. A significant improvement since the audit review has been the recruitment of an International Regulations Manager, who is already having a positive impact upon this area.	🟥	🟧
29	**Attendance Monitoring**	Nov 2022	As part of its visa sponsorship licence, the College is legally required to monitor the attendance and engagement of our visa sponsored overseas students and to report to UK where a student does not meet the minimum	🟥	🟥

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
			standard of attendance and engagement. Arrangements for monitoring attendance and engagement (which can also be used to identify and support any student who is disengaging from studies and in risk of failing) varies between faculties. Two faculties have robust procedures which would likely meet UKVI standards. Other faculties are only partially meeting the standard. The review has made recommendations for remedial action, taking into account possible resistance based on a perception that attendance monitoring is an intrusive process for students and an onerous one for academic staff to help administer.	RED	RED
Value for Money					
30	**Energy Procurement and Sustainability**	Feb 2022	Our review of the energy procurement and sustainability highlighted many positives aspects and provided a satisfactory rating at its conclusion. Policies and processes had been in place for efficient energy use for many years, and consequently the College has performed well in carbon reduction, which has been independently and externally verified. The College has an environmental management system certified to ISO14001 standard that contributes to the objective of energy efficiency and carbon reduction. Energy usage is business operations is continuously monitored to identity opportunities for further efficiencies. Governance structures are considered to be appropriate. King's Climate Action Network was considered an excellent example of an interdisciplinary forum that provides support for achieving net carbon zero and other objectives.	GREEN	GREEN
31	**Management of NHS Teaching Contracts**	Nov 2022	Our satisfactory review of the management of the NHS teaching contracts highlighted a strong control environment with just one recommendation made with the aim of strengthening the variance in Budget and Forecast figures. This was because the sample test of contracts carried out supported the Budget figure, but the Forecast figure could not be substantiated by NHS Contract Teaching income.	GREEN	GREEN
32	**Pre-award Costing and Contract Development**	Nov 2022	The costing and development of research contracts, prior to award, was considered satisfactory following this review. Some minor issues were surfaced, including that in a sample of 20 awarded "Live Projects", 25% had not been submitted to the RG&C team within 5 days of the bid submission date as required by the "Policy on Administration of Research Grants and Contracts". This can restrict the amount of time Pre-Awards have to review a contract before approving. Limited evidence was held on Worktribe to confirm that the relevant Ethics approval process had been completed. An automated feed or additional manual input should be created from the Ethics system to ensure that relevant evidence is held on Worktribe. We also noted that contractual agreements should be signed on a timely basis in line with good practice.	GREEN	GREEN

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
33	Worktribe post-implementation review	Nov 2022	This review was undertaken to consider whether the objectives in the business case for the Worktribe solution to support Research Management had been met in the implementation of the system. A second objective was to understand how benefits realisation are managed in such projects. It found that the majority of expected benefits have been delivered and there was confidence that the remainder would accrue when the implementation is fully concluded. The review noted that of the ten key benefits identified in the business case, seven were fully delivered, with the other three partially complete. The review identified four things that should be replicated in future projects and five should be enhanced.	🟡	🟢
Data Quality					
34	Research Data Governance	Nov 2021	The purpose of this review was to understand the current landscape for research data governance at the College. This was done by engaging with various stakeholders from within the King's research community, to examine the general practices for managing and curating data, to understand sector and industry best-practice and to undertake a gap analysis to identify any areas of weakness. To improve researchers, experience and understanding of their responsibilities it was recommended that a research hub be created with clear information such as a checklist for researchers, guidance on data storage options and outlining the roles and responsibilities of stakeholders of the research community.	🟠	🟡
35	Open Access Publication of research	Nov 2022	Overall, this review found that the management of Open Access Publication in Research was satisfactory, but it was noted that there was an ongoing challenge of reaching individual researchers across the university in order to ensure that compliance to the terms of public funding in relation to research publication are maintained. Although a revised Research Publications policy will help to simplify the message, there is a need to demonstrate that the College is following up and engaging meaningfully with researchers on this policy. A number of recommendations were made by the review for ensuring that researchers were engaged and incentivised to use the publication scheme and support for open access publication offered by Libraries and Collections, via tailored messages, training and better use of the Pure system.	🟢	🟢
36	Cyber Security Maturity assessment	Oct 2022 ARCC Cyber subgroup	A detailed technical audit is undertaken each year on the College's cyber security posture and an assessment on its strength and maturity. The review in this academic year noted that cyber security continues to develop across the university and is now considered as more of a Business-as-Usual activity, that cyber security capability within King's has continued to develop and grow, and that a range of cyber security initiatives are either planned, ongoing or recently completed, all of which are helping to mature the approach to cyber security.	🟠	🟠

#	Title of Review	Reported to ARCC	Key findings and follow-up notes	RAG Rating at Audit	RAG Rating Nov 2022
			Members of the ARCC cyber sub-group were pleased to note the improvements, but also strongly encouraged the College to reach a baseline score of 3 in all elements of the combined NIST/CIS methodology used for the evaluation when it is done next year.	🟧	🟧
Special Investigations					
37	**Lessons learnt from the development of a Containment Level 3 (CL3) laboratory**	Nov 2021	A lessons learnt review was requested by the Senior Vice-President (Operations) into overruns in time and budget on the project to construct a new CL3 laboratory facility on the Guy's Campus. The review identified issues, dating back to a sub-optimal review process for the business case. A failure to identify a responsible owner of the laboratory resulted in there being little effective ownership of a high-risk facility. Health & Safety Services had been required to take more operational responsibility in the project than appropriate for their governance role. Many of the recommendations were focussed on project methodology, which has now improved with the introduction of the Project Governance Arrangement.	🟥	🟨
38	**Graduate Teaching Assistant Framework**	June 2022	This was a lessons' learnt review which was commissioned by the SVP (Operations). A number of elements were found to contribute to the failure to successfully deliver the new GTA framework in autumn 2021. A key element was the failure of the project board to appreciate the amount of work that was needed to implement the change, which was more than the "lift and shift" that was first anticipated. A number of recommendations were made for more rigorous assessments of the work needed to deliver a complex change project to be made in the future. Another key element was a failure to test assumptions made around the way the framework would work when released. The arrangements for redelivering the GTA framework in 2022 learnt many of the lessons learnt in the first attempt to deploy it and it has been successful. A number of the recommendations around project delivery have already been taken up by the Project Governance Arrangement.	🟥	🟩

Enterprise Portfolio

Snapshot and Insights

September 2022

Background

Projects and programmes – our learning

At any one time, King's is delivering a vast number of projects and programmes:

- Major ones in development or underway – for example the Student Success Transformation Programme, development of our sciences strategy, building the Quad, the London Institute for Healthcare Engineering and Children and Young Persons Centre, introduction of Global Social Mobility framework and a major programme of estates strategy with expanded masterplanning across all campuses;
- King's has developed a number of professional functions which are oriented around delivering and supporting projects - IT, Estates & Facilities capital projects, Transformation team in SPA;
- Beyond this most faculties and directorates will be leading or involved with projects;

A review of project management practices commissioned by Business Assurance in early 2021 recommended:

- Creation of a university-level portfolio
- Review of senior sponsors and training required
- Good-practice project and programme governance
- Knowledge management and benefits realisation processes

Through this enterprise portfolio snapshot, and our new Portfolio Governance Arrangements, we should be considering:

- **Financial capacity –** understanding our current commitments, and new ones being requested *(slides 7 & 10)*
- **Delivery capacity** – recognising many projects require cross-functional support *(slides 8 & 9)*
- **Leadership capacity** – leadership bandwidth to manage this many projects well *(slide 8)*
- **Change capacity** – the impact of this portfolio on staff and students *(slide 9)*

This snapshot is particularly critical at this juncture when King's has:

- New senior leadership
- A new strategy to 2026
- Rising costs and high turnover and vacancies in our workforce

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What is our Enterprise Portfolio Snapshot and why is it important?

Why is visibility of activity at Portfolio and Enterprise Portfolio level important?

- A Portfolio is a collection of projects, programmes and sub-portfolios which are managed together to achieve an organisation's strategic objectives.
- Portfolio management is the selection, prioritisation and control of an organisation's programmes and projects, in line with its strategic objectives and capacity to deliver.
- The goal is to balance the implementation of transformative initiatives and the maintenance of business-as-usual, while optimising return on investment.
- Enables *portfolio definition* - support Investment Advisory Sub-Committee (ISC) to provide advice to University Executive in the context of what's already underway. It enables prioritisation of investment to deliver against strategic objectives.
- Supports *portfolio delivery* - will facilitate Portfolio and Benefits Assurance Sub-Committee (PSC) in providing assurance around project and programme delivery. Provides a view of status of the portfolios and highlights exceptions where intervention is required.

> **Questions it can help us answer:**
> - Are we doing the right projects, at the right time (strategic alignment, priorities)?
> - Are the projects we are initiating actually deliverable (resources, capacity, capability)?
> - Are we delivering projects well (health check on progress, timelines and budget)?
> - Are we delivering benefit for our investments (as stated in original business case)?
> - Which areas of the organisation are being impacted by change – are there hot spots?
> - Are we trying to deliver too much, or too little? (focused activity, strategically aligned)?
> - Is there anything we should stop doing/ pause to make best use of resources?

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What is our Enterprise Portfolio Snapshot and why is it important?

This Enterprise Portfolio snapshot provides a single, amalgamated view of individual portfolios across the organisation:

Portfolios included are: Estates & Facilities, IT, RMID, SPA, HR and Students & Education

- RMID portfolio is being further developed to widen its scope
- E&F portfolio excludes projects that are completed but in 12 months defects period
- Faculty-based projects would be assumed to be captured via one of the functional portfolios, however if the change is not being delivered by one of the above, it is possible it is not recorded
- Partnerships are not captured here as a matter of course; this portfolio is managed via the Partnerships Committee

Points to note:

- Captures *potential* ('pre-activation') projects as well as those *in development* and *in delivery*
- Reporting is not yet standardised so lots of manual manipulation is required at this point
- As our portfolio governance needs clarify we can align processes accordingly
- There are other portfolios to include in time, such as Finance, Faculty

Summary:
- **This is a first go, it's not perfect, it's not complete and the data are not necessarily consistent across portfolios (e.g in classifications)**
BUT
- **It's a first step on the journey of us understanding our investment commitments, activity and ability to successfully achieve our goals**

King's College LONDON

Executive Summary – Early insights

1. Health warning on data – low level of accuracy and consistency across portfolios
   - We'll want to 'cut' our enterprise portfolio many different ways to answer different questions.
   - It will take some time to have standardised data of a high quality (accuracy) that will enable this

2. Even with the incomplete view we have today, this snapshot starts to quantify the sheer scale of projects and change activity underway across King's
   - The enterprise portfolio, which has been manually collected, currently holds nearly 600 projects, of which 352 are actively underway
   - Total portfolio investment, where there is financial information, indicates circa £309m

3. 50% of projects in development and delivery are considered to be 'Develop & Transform' by spend, by Project no. this is 31%

4. Project sponsorship is distributed across a large number of people, with some individuals holding a very large number

5. We see significant levels of cross-functional delivery and support for projects, this requires strong project practices and stakeholder engagement to achieve successful outcomes

6. 7 (Seven) projects have a red RAG-rating; many projects are not yet rated in a way we can easily capture (note RAG status fluctuates in response to active management of delivery risk)

As we enter the next strategy and investment cycle the enterprise portfolio warrants review…

- Almost 600 projects have been captured so far

- These are individual projects, i.e. not duplicated between portfolios

- Of these, we are actively working on 352 i.e. in development and in delivery

- The number of projects will only go up as we improve on capturing portfolio information, e.g RMID

- We have incomplete financial data - not all projects have finance data included

Project Stage	Project #	Budget
Committed – in delivery	182	£176,718,527
Approved – in development	170	£24,048,375
Pipeline	245	£109,013,550
Total	**597**	**£309,780,452**

Insights:
- **With over 300 projects actively being worked on, it is not surprising the organisation feels like 'there is a lot going on' and workload is an issue**
- **Delivering this volume of projects and change means we need to professionalise and standardise how we deliver projects and programmes across our multiple portfolios**
- **The strategic alignment of the contents of the enterprise portfolio is unclear**

We can see there is a substantial level of activity and significant investment underway already…

Project number by budget range
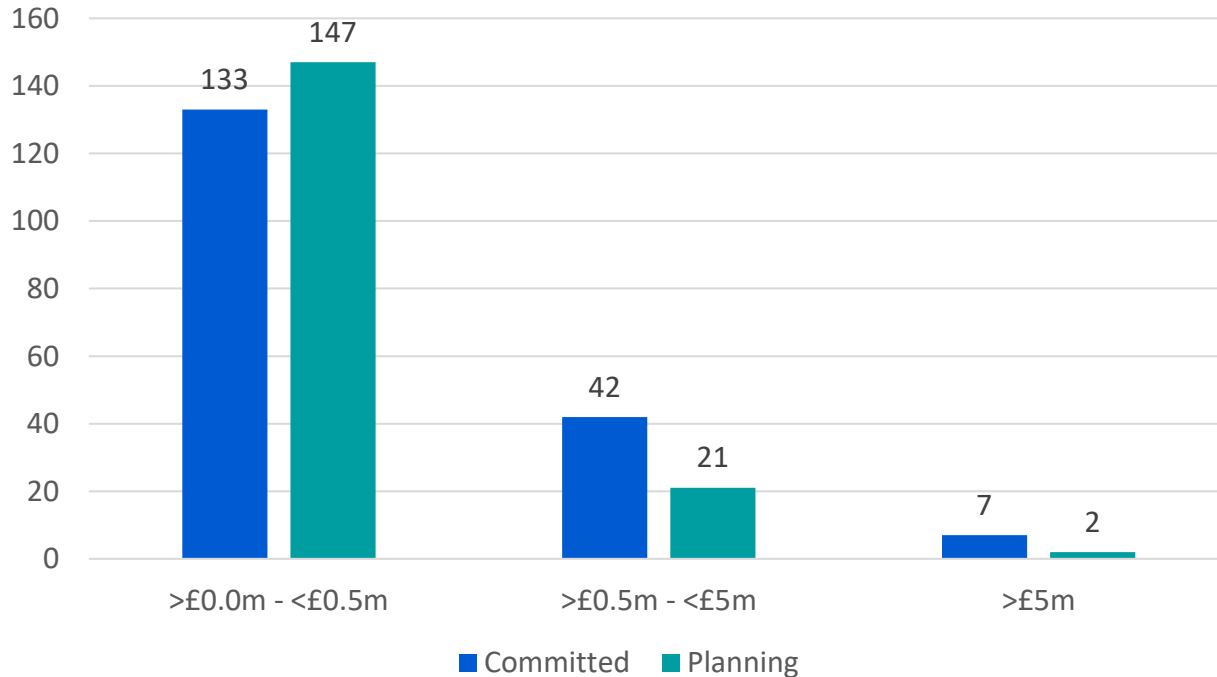
- We have 72 projects underway with a budget over £500k, 9 of which are over £5m

- Our Investment Advisory Sub-Committee's (ISC) criteria look at investments >£500k

- We don't currently capture the financial cost of our internal resources working on projects

- Our financial data is incomplete but indicates significant levels of investment. Once it is more complete, it can help with:
  - Understanding the true cost of projects and programmes
  - Checking that functional budgets / business plans have captured the BAU requirement
  - Track capital allocations, i.e.; Develop & Transform, SCIF and Operating Capital

- Visibility of pipeline projects varies across portfolios, and most don't currently capture any

Leading change - of the projects in development and in delivery, 50% of the spend is for 'develop and transform'

Type of project and budget
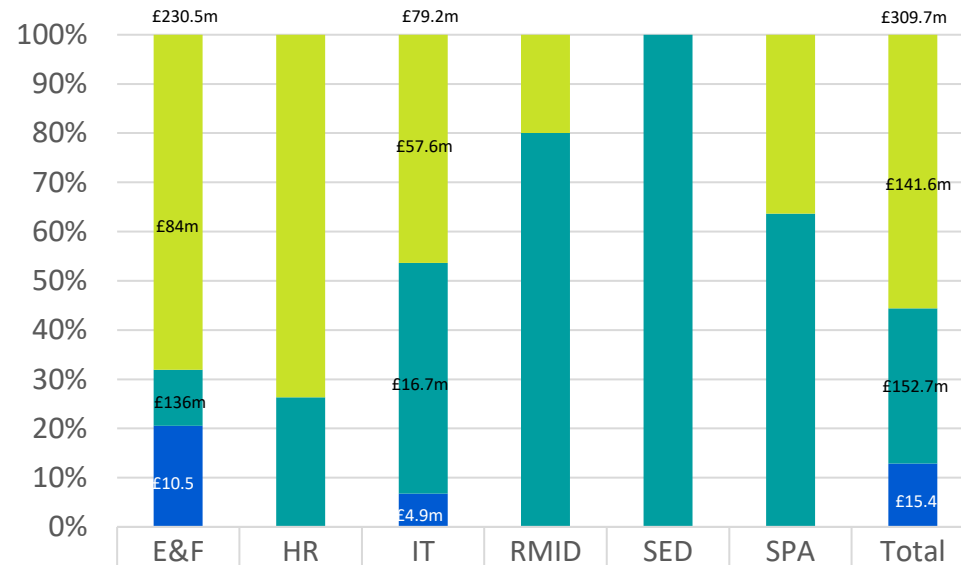
	E&F	HR	IT	RMID	SED	SPA	Total
Replacement & Continuity	209	14	96	1	0	12	332
Develop & Transform	35	5	97	4	26	21	188
Compliance & Regulation	63	0	14	0	0	0	77

■ Compliance & Regulation   ■ Develop & Transform   ■ Replacement & Continuity

Through our new Portfolio Governance Arrangements we should be considering:

- **Change capacity** – the impact of this portfolio on staff and students

- **Delivery capacity** – recognising many projects require cross-functional support

- **Leadership capacity** – leadership bandwidth to manage this many projects well

In considering our Senior Leadership of projects and programmes:

- 200 of our projects have an SRO assigned

- Over 68 individuals with between 1 to 26 projects per SRO

- **Distribution** – we need to balance know-how and capacity

- **Authority** – what mandate does each SRO have?

- **Skills and support** - SPA have an action to develop 'support package'

- We should also consider that the vast majority of our active projects will have a Project Board, Chaired by the SRO. There is the opportunity to rationalise effort if we start to combine silo'd projects into programme or portfolio level boards.

High levels of change and identifying hot spots……

- The enterprise portfolio is not just about financial control, it's also about understanding the people dimension of change
- The below is for indicative purposes only, but we aim to provide a heat map of the people impact of our projects across the organisation
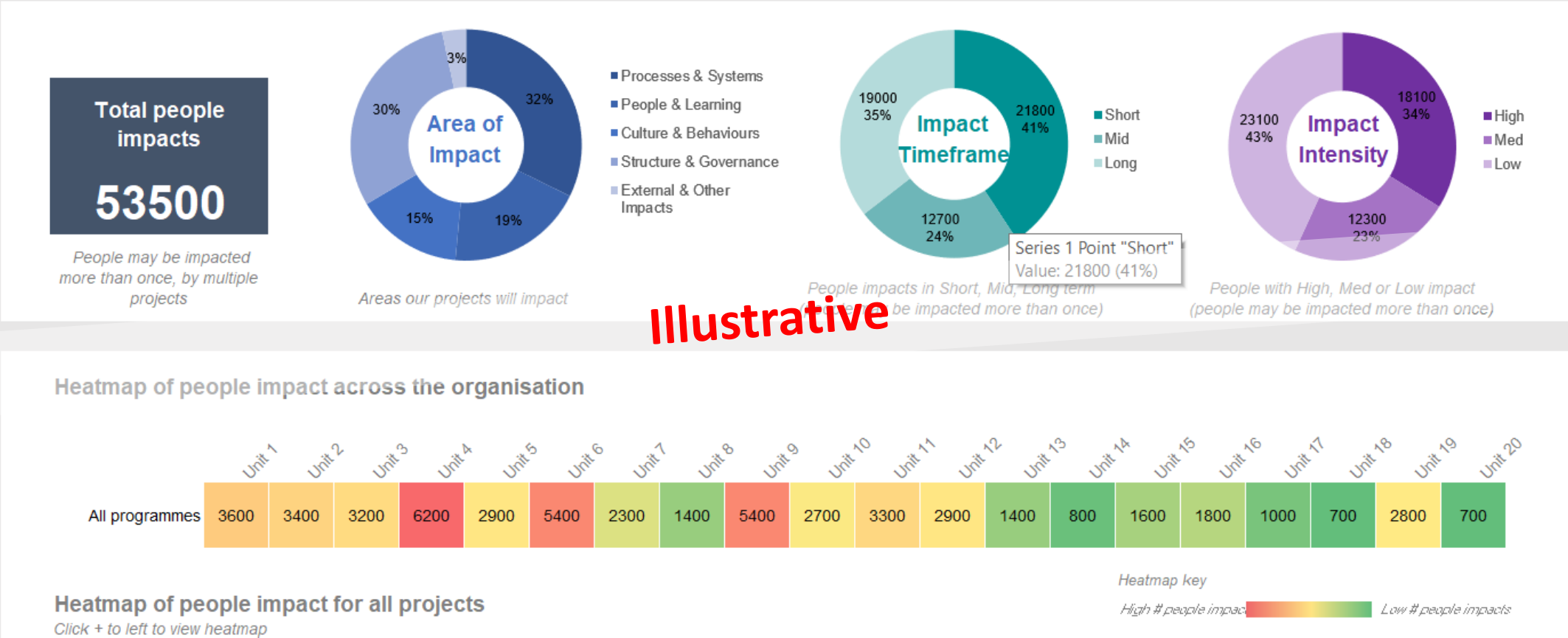
Managing change and risk – the enterprise portfolio is constantly changing; Red Amber Green (RAG) status will help direct our collective attention

New significant investments approved in last 4 months – at least **11 new projects** have gone through UE approval; approved investment of £15m, total potential **investment of £215m.**

Projects underway – RAG information on projects is incomplete and the methodology for ratings varies between portfolios.

We have 144 projects that have a RAG rating which requires additional scrutiny - 7 are red and 137 are amber.

PSC will focus it's attention on red projects and persistent amber projects. It will also introduce consistency around lessons learned and benefits realisation.

RAG

■ red ■ amber ■ Green/ unknown

Projects closed - In the last 6 months 26 projects have been retired or completed.
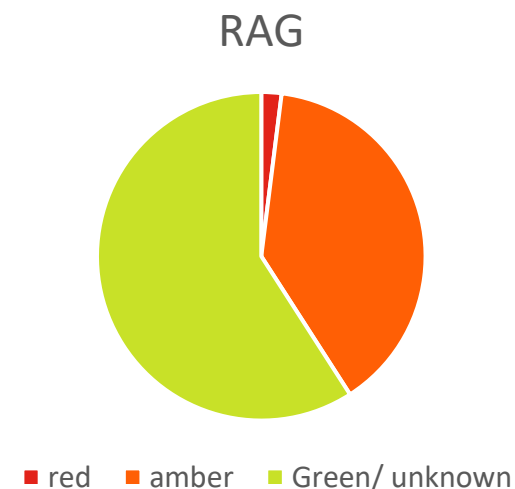
Insights:
- **We have a constant flow of requests for funding, which needs actively managing**
- **Even in the last 4 months we've added 11 new projects to the enterprise portfolio with a potential total investment of £215m**
- **We need a stable enterprise portfolio both financially, and in terms of successful deliverability**

King's College London

Next steps in developing our Enterprise Portfolio and wider programme and project practices

There are known issues and gaps with the current enterprise portfolio data we have, and challenges with data collection, so continuing to evolve our portfolio management is critical. Next steps are:

- Establish a central King's Portfolio Office, which:
    - will transfer resource from the current IT PMO to report to the Portfolio Director in the SVP Ops Office
    - will provide reporting standards, best practice, tool kits to be used to support the project management functions within the organisation
    - will help ensure that all projects are aligned with the business strategy, standards and policies.
    - enable the Portfolio & Benefits Assurance Sub-Committee to focus on the projects which need attention, and report regularly to UE

- Move away from manual data capture of project information and put in place digital tools to capture and report the information

- Keep working with portfolio leads to improve the information captured, and the accuracy of it

- Develop standard risk management and RAG ratings for projects

- Develop a benefits framework and support the regular capture of lessons learned from projects and programmes, and share widely among the collaborative PMO community

Insight:
- **Developing our enterprise portfolio approach, and the King's Portfolio Office supporting more efficient, effective delivery through standard processes, reporting, targeted interventions and sharing best practice will deliver benefit**
- **Efficiency saving of 1% across the enterprise portfolio would be £3m (352 projects, £300m total)**

King's College LONDON

The ask of UE

- To note progress in our understanding of the Enterprise portfolio, acknowledging it's not perfect and this is only the start. We ask for UE support in the ongoing maturation of our portfolio, programme and project practices at King's.

- To note the risks of our current enterprise portfolio:
  - Delivery risk - ability to actually deliver on what is currently underway, with significant additions in the pipeline
  - People risk – the capacity, and capability of the organisation to successfully embed the level of change associated with the enterprise portfolio
  - Financial risk – significant investment commitments in place, with a constant flow of new requirements

- What we'd like from UE:
  - Grant approval for Director of SPA and Director of Portfolio, in collaboration with other key stakeholders, to design and lead a process to:
    - ❖ Review our committed portfolio and sense-check strategic alignment and optimal allocation of resource
    - ❖ Sense-check our potential/pre-activation projects against strategy and capacity so we deploy finite resources to best effect

Appendix

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Risk Topic: Operational Risk Management (*minute*)

The Director of Business Resilience reported that a process had been established for managing operational risk, which supported the management of enterprise and portfolio risk. This uses the expectations set out in the Service Excellence Framework to track the risks to delivery of service. A risk management universe has been created which describes which areas have organisational ownership of each risk. This framework is being used to inform the capacity for College operations to support its strategic growth aspirations. For instance, the College might decide that it has an appetite to undertake a certain packet of work, but the operational risk analysis will show that there is insufficient capacity or resource in that area to successfully deliver the work. If managed properly, this will mean that in future unnecessary level of risk will not be carried.

Going forwards, low level projects in the Refresh and Renew strategy will be considered through the Operational Risk Management process and will be evaluated against a Business-as-Usual framework at their inception and during their lifetime. The creation of a framework also provides clarity around risk escalation and what should pass to the next level of risk management for consideration. In this way, the College hopes to create a more holistic view of risk management. Additionally, the College continues to run Business Continuity exercises, to test the operational risks and their likely impacts.

Members followed up by asking questions related to all three risk presentations. The management team noted that change capability around risk was good. There are various professionals around the College with change management skills and management are trying to build capacity further. The College now has a clear methodology on this discipline and there is a good track record on projects like portfolio simplification and the move into Bush House. The key is considered to be clarity around requirements at the start.

In response to a question about the governance framework around risk, management noted that they were not replicating what project boards did already, but the PGA provided a prioritisation framework and a scrutiny process for projects which were raising red flags or consistent ambers. Members asked how projects were evaluated against each other, and management responded that bringing together projects and programmes into one portfolio has helped with equal and fair evaluation. In terms of working with the NHS partners, it was noted that joint programme boards tend to be created for joint projects and there is an overarching operational partnership committee to enable conversations about how projects are running and to pick up any difficulties before they reach a critical stage.

The Chair noted that, as the reporting capability around the portfolio develops, it would be useful to have a short report each term to share with Council in order to inform them about how projects were progressing.

Council	
Meeting date	22 November 2022
Paper reference	KCC-22-11-22-09.3
Status	Final

Report of the Governance and Nominations Committee

For Discussion

1. Away Day Follow Up

The Committee considered the outcomes of the Away Day held on 21 September 2022 and any follow-up actions needed. In discussion the following points were noted:

o It had been a very productive day and the small meeting of Council members held at the end had been very useful and had confirmed this.

o Communication of follow up action with Deans and Council Members was critical. The Principal would share the summary notes and actions to be taken with the Deans and discussion of the report at Council would be taken on the main agenda.

o The Principal outlined the following actions being taken for key messages received at the away day:

  o Student Support - participants had agreed that student support should be the top priority. Since the Away Day a strong appointment had been made to the new post of Executive Director of Student Support Transformation. The post would report directly to the Principal. and not through the Director of Students and Education. Significant improvement to the NSS results would require multi-year effort.

  Members of the Committee suggested that a deep dive briefing on student access be arranged with the new Executive Director of Student Support Transformation for Council and the Executive Deans and that the Executive Director be invited to make a presentation to Council at an appropriate point.

- o Online King's Global – the proposals made at the Away Day had lacked clarity with respect to the way in which the elements of provision would fit together: King's campus, King's Online (domestic and international) and Pearson and whether they were to meet different objectives. The executive team would return to Council with further developed proposals and the changes anticipated from Pearson.

  Members asked that the Principal keep Council abreast of developments in his regular reports to Council in the meantime.

- o Executive Project Lead Information – Council members had asked that they be kept informed about the individual project lead responsibilities of senior executive staff. The Principal would provide the Remuneration Committee with a statement of management priorities with indicators for responsibility and timing. This would take the form of a mid-year report and would be reported to Council from the Remuneration Committee as a matter of routine.

The Committee agreed the following actions:

(i)   That the Executive Director of Student Support Transformation would be invited to present to Council.

(ii)   That further developed proposals for King's Online detailing the fit with King's campus and Pearson provision would be presented to Council and that the Principal would report on progress in his regular Principal's reports in the meantime.

(iii)   That the Principal would provide Council with a mid-year statement of management priorities, showing individual executive responsibilities and timing to be presented through the Remuneration Committee.

2.   **Comprehensive Communications Strategy on the Role of Council**

The Committee welcomed the emerging Council and governance communications and engagement framework **[See Annex 1]** and commented as follows:
- These initial steps should form part of the wider communications strategy and messages should be reinforced between the staff and governor communications.
- Core messages should be woven into messages from the Chair and Executives.
- There should be a commitment on the part of independent Council members to have at least one engagement with students and with staff facilitated by executive colleagues each year.
- There will need to be an engagement plan around the governance review.
- The Strategy should involve students.

Implementation of the Strategy would begin immediately.

3   **KCL UCU Letter re Council Membership**

The Committee considered a letter issued by UCU to the Council on 12 August 2022 with respect to its earlier petition concerning Council membership [**Annex 2**]. UCU was seeking to have a right to elect a majority of Council members enshrined in staff employment contracts. This is a further to its earlier petition discussed by GNC and Council last year with respect to Council membership. Council had agreed that it would not support the proposed changes at this time but would include the issues in the 2023-24 governance review. Subsequent to that decision, two members of Council had met with the President of the UCU and one of his colleagues to further understand their views. That meeting had not provided any new rationale that would warrant Council re-opening the issue.

The Principal outlined the current issues under discussion with the UCU and the likelihood of industrial action this year.

The Committee was informed of questions and proposals raised recently in the Academic Board with respect to the role of the Board in human resources matters concerning academic staff. The Committee agreed that these issues should also be considered as part of the governance review.

For Note

4. Council and Committee Appointment Recommendations

The Committee agreed to recommend the following appointments to Council and Council has approved them by email circulation:

- Vinay Jha, Independent member of Council

- Rachel Mills, Staff member of Council

- Kim Piper, Staff member of Audit, Risk and Compliance Committee

- Natasha Awais-Dean, Staff member of Governance and Nominations Committee

- Julie Moonga, Student member of Audit, Risk and Compliance Committee

5. Protocol for staff appointments to ARCC

The Committee concurred with the view of the Chair of ARCC that the level of staff that would be the cut off for staff managers to be eligible to sit on the ARCC be Executive Dean/Executive Director rather than Head of Department.

6. Ongoing Searches

6.1 Honorary Treasurer

The Committee agreed the shortlist to be invited to interview, subject to one potential conflict of interest query and agreed the interview panel as follows: Lord Geidt (Chair), Clare Sumner, Natasha Awais-Dean, Michael D'Souza and the KCLSU President (student member of GNC).

6.2 Staff & Culture Strategy Committee

The Committee noted progress in the appointment process for membership of the Staff and Culture Strategy Committee. The search for three independent members of the Committee was ongoing and it is likely that a list of candidates will be ready for short-listing early in November. The Chair of the Committee, Lan Tu, had established an interview panel consisting of herself, Donna Catley, Ellen Clark King, and Hillary Briffa. A call for nominations for the five staff seats had drawn an unprecedented 63 nominees from all areas of the College and all levels of staff, all of whom were given an initial interview. The panel was now conducting interviews of short-listed staff candidates and hoped to have a final list for recommendation before Christmas.

Council had delegated to GNC the authority to establish the membership of the new committee.

6.3 Remaining Council Vacancy

The Committee considered a list of potential candidates identified by the search agents, Odgers Berndtston, for the seat formerly held by Bishop Sarah Mullally. It agreed that staff and student membership of the panel for this position would be critical.

The search agent would meet with all candidates over the next two weeks and would provide further guidance in due course with respect to a short list.

7. Members' Interests Audit

At the request of the Chair of GNC, as an extra due-diligence step, an audit had been conducted to ascertain whether there were any potential conflicts of interest arising for members with respect to university investments and university suppliers, noting that members would not likely be aware of

the details of the investments or suppliers. The Committee agreed that this had been a useful exercise and suggested it be conducted annually. Any potential conflicts identified would be added to the Register of Interests following consultation with the member(s) in question. The report would also be taken to ARCC to ensure due diligence.

For Approval

8.   Minor Ordinance Amendments

Note: This item is on the Council agenda at item 6 – Report of the Chair.

The Committee reviewed and recommended for Council's approval a series of editorial amendments to the Ordinances, largely related to changes in titles of members of the senior executive. In order that such changes might be made more expeditiously in future, the Committee also recommended that:

Ordinance B1 be amended to enable the College Secretary to make minor editorial amendments to the Ordinances, with such amendments being reported to the Governance & Nominations Committee.

Clare Sumner
Chair, GNC
November 2022

Council and governance communications and engagement framework update
Over the next 12 months, building on proactive communications completed over the summer to support the reappointment of the Chair of Council and announce new Council developments, we are continuing to develop a more open and transparent narrative and communications approach around King's Council, members and processes.

Following previous discussions, King's Corporate Communications team and the College Secretary have worked together to develop a framework – including priority audiences, major milestones in the year, potential issues and tactics – to set out 12-month communications approach for Council Governance.

Context and Background
Currently among staff and students, there is a limited understanding of the role and running of Council, how members are selected and what they do and how Council governance contributes to the running of the university.

We will look to ensure we strike the right balance between Council's role as stewards of the university, governing it so it is well run, and the President and the senior executive's role and responsibility for the strategic management and day to day running of the university.

Objectives
To develop a communications approach that builds awareness and understanding of Council Governance – its people and its processes.
The approach will seek to:
• Improve understanding of Council Governance – of its activity and positive contribution to King's
• Profile awareness of key individual members
• Communicate and explain wider governance arrangements

Audiences & Channels
We have identified five key priority audiences. We consider that these audiences are those it would be most effective to focus on to deliver our objectives.

1. King's academic, research and professional staff
a. **Rationale:** Staff are clearly one of the most important and largest audiences for our communications. We do not believe there is a major difference across different professions in terms of their understanding of College Council, or in the channels they use – which is why we have grouped them together into one audience.
b. **Priority channels:** Newsletters (King's Essentials), President & Principal vlogs, all staff forums and LinkedIn

2. One King's Leadership Team
a. **Rationale:** One King's Leadership Team comprises around 250 leaders and managers across academic, research and professional practices. While these staff will not often interact with Council directly, they should have a greater understanding of King's governance arrangements, and we would expect them to implement policy changes and filter information down from Council.
b. **Priority channels:** Email and leadership meetings

3. King's University Executive team
a. **Rationale:** King's University Executive team should interact with Council, its members and understand it well. Some members (SVPs especially) have more established relationships with Council and in fact are members of Council. Others may potentially see Council as a step to get past with their proposals, rather than partners with expertise and knowledge to add-value to their own and university decision making.

While Council members may regularly engage with the Principal's direct team or with some member of UE who report in to Council standing committees, there are others, such as Executive Deans, who currently have limited opportunities to engage. Our executive team are a key channel to develop an understanding and we need them to be our advocates for Council and its value.

b. *Priority channels*: Council meetings, Leadership meetings and email

4. KCLSU President, Officers, staff and students

a. *Rationale*: The challenge of engaging with KCLSU officers is their short time (one year) in office. Nonetheless, we need them to understand and buy-in to Council's processes and governance procedures and to help offset misinformation students may receive from other sources.

b. *Priority channels*: KCLSU induction meetings, KCLSU owned channels (the King's communications team has no influence over these channels or this engagement and this is something for the College Secretary to consider further).

5. Funders, alumni, wider sector and select media

a. *Rationale*: We do not expect or need this wider group of influential external stakeholders to have a strong view on Council. However, currently understanding may be impacted by negative coverage driven by our critics, which we need to neutralise to ensure we maintain our funding streams and wider reputation.

b. *Priority channels*: Email, magazines, events, website

Tactics/Approach

Our approach will comprise several key tactical areas:

1. *Using business as usual opportunities in the strategy and governance calendar to be more proactive*:

Rationale

We will use milestones in the normal governance calendar to deliver key messaging about Council and its role.

Example tactics

• Council members to begin to visibly engage in strategic goals of Strategy 2026 or areas of university by meeting with more staff / engaging on wider range of issues. The obvious area of focus is People and Culture this semester, but there is also potential for Council to more visibly associate other areas such as student success or research, which would allow Council members to engage students and staff in partnership with the Executive Team members responsible. This is already beginning to happen but opportunities for relevant Council members to be invited to join listening sessions with Staff 100 or Student 100 forums about Strategy implementation should be considered by senior leaders as they develop their plans and engage students and staff.

• Through the process of launching and consulting on the upcoming Governance Review, use online blogs and in-person consultation meetings to articulate how current decision-making works.

2. *Seizing opportunities to raise the visibility of Council through ongoing internal engagement or business activities*:

Rationale

We will continue to leverage regular forums – such as the All Staff Forum and monthly One King's Leadership Team – to raise visibility of Council and its members.

Example tactics

• Tying into regular vlog content the President & Principal already delivers

• Featuring individual members in the Meet section of King's Essentials (our weekly all staff newsletter)

• Interviews with Council member with Alumni e-news and In-Touch magazine, the alumni-focused channels – these provide opportunities to share content in staff channels

• Regular termly updates/impact reports in King's Essentials following governance moments/ Council meetings to be introduced by the College Secretary

• Q&A with Council members at One King's Leadership Team (ideally this should happen at least twice a year)

We believe some consideration should be given to new Council members having on campus, experience-focused inductions – such as 'day in the life of a student' or 'day in the life of staff' – as part of their induction so they have a hands-on opportunity to understand how the university works.

*3. **Developing and revising content on our channels**:*
Rationale
We will continue to refresh our website and intranet content to create a more proactive narrative on our Governance arrangements. Much of the content is already there but there are always opportunities to make it clearer.
Example tactics
• Updating Council members biographies on the website.
• Bespoke video content for new-starters and professional development modules (e.g., the new Heads of Department programme) to explain Council Governance and involve Council members to make them more visible or content focused on the work that Council is doing in a specific area such as People and Culture.

Scaling up our approach
There may be some hesitancy about shifting to a more proactive communications approach, when there has been none in the past. We know that we must take King's stakeholders, including Council and its senior leadership, on a journey with us. Therefore, what is proposed here is a menu for the first year, and we will then need to re-evaluate the approach.

There is an option, if there is appetite in the future, to scale up our approach and to be bolder. For instance, inviting a variety of student leaders to observe Council, or a senior member of Council doing an on-the-record interview with *Roar* (the main student magazine). However, those steps are best considered as we get some feedback from the steps already outlined.

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12 August 2022

Dear Prof Kapur, Lord Geidt, and Members of the King's College, London Council,

We write with respect to the [petition](#) to restore our rights to vote for the Council, signed by over 1750 members of academic staff, professional services, and students. We would like to propose codification of each staff member's right to vote for a majority of Council members, as a term of each employment contract, as follows:

"As part of your employment contract, you have the right to vote from time to time for [10 out of 19] members of the King's College, London Council, either directly or via members of the Academic Board."

We have urged the benefits of the right to vote for a majority of the Council to bring our university together, strengthen our independence, and protect academic freedom and innovation. We have drawn attention to:

- the rule that 8 members of Council should be elected by academic staff, and 2 by non-academics, in the King's College, London Act 1997 [section 15](#);
- the beneficial practice of staff votes for the Oxford Council with 15 out of 25 elected by staff, including 5 external members (Statute VI [arts 4 and 13](#)), the Cambridge Council with 16 out of 25 staff-elected (Statute [A.IV.1](#)) while the UCL Council has 6 out of 20 elected via its Academic Board (Statutes, [art 3](#));
- the fact that KCL elected staff representatives were unilaterally abolished in 2009, without review;
- the incomplete restoration of 3 elected staff members, via the Academic Board, in 2018;
- the suggestion of the previous Principal, Sir Ed Byrne at a meeting in December 2020, with the Council Chair, and the KCL UCU president, that the Council's current eight staff members could be elected.

This has become all the more pressing because in a consultative e-ballot during July, over 80% of our colleagues voted that they were prepared to take strike action, and 87% said they were prepared to take action short of a strike, for democracy on the Council, as well as other pressing issues of pay, job security and equality.

We have been told that staff lack the "skill set" to serve on the Council, but this is factually mistaken. Our colleagues have rejected delay, and rejected waiting patiently for a review in 2023-24. Our colleagues have reviewed the issue already. It is right as a matter of principle that we uphold voting rights, not suppress them.
We therefore invite King's College, London to make the changes we need for inclusion of the right to vote into the express terms of employment contracts, and for future nomination procedures for the Council. Under the existing KCL Statutes ([article 1](#)) and Ordinances ([B4.1](#)) there is full discretion for the nominations committee to appoint those who have been chosen by staff in an appropriate election procedure, without further changes to the Charter and Statutes by the Privy Council.

Yours Sincerely,
King's College, London, University and College Union

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	King's College Council	
Meeting date	22 November 2022	
Paper reference	KCC-22-11-22-09.5	
Status	Final	

Report of the Academic Board

Contents	Meeting at which considered	Consent agenda	Council action
1. OfS Conditions of Registration **[Annex 1]**	2 November 2022	No	Approve
2. HR Excellence in Research Award: Research Concordat Action Plan **[Annex 2]**	2 November 2022	No	Approve
3. The Future of Online Education at King's	2 November 2022	Yes	Note
4. Strategy Refresh	2 November 2022	Yes	Note
5. Academic Workforce Report	2 November 2022	Yes	Note
6. Academic Board Sub-Committee reports	2 November 2022	Yes	Note
7. Other items approved or noted	2 November 2022	Yes	Note

For approval

1. **OfS Conditions of Registration**

   Motion: **That the Annual Report on Ongoing Conditions of Registration for Office of Students for 2022/23 be approved and accepted as assurance that the College continues to meet the OfS ongoing conditions of registration.**

   Background: The OfS monitors higher education providers, and as part of this expects providers to continue to meet ongoing conditions of registration, including any new conditions introduced since the initial registration process. Governing bodies of universities also have a requirement to receive assurance that the College is meeting the conditions set out by regulatory and funding bodies. The CUC 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*'.

   From 1st May 2022 the OfS have operated new/revised Condition B: Quality and Standards conditions of registration. A mapping of King's practice and identification of any gaps/action was presented to College Education Committee at its meeting on 6 July 2022 before the report was brought for CEC approval on 12 October. Following CEC consideration, the report was updated further with the OfS release of the data dashboard relating to Student Outcomes (Condition of Registration B3). Academic Board recommends that Council approve this. **See Annex 1**

2. **HR Excellence in Research Award: Action Plan against the Research Concordat**

   Motion: **That the HREiR Action Plan for 2022-25 be approved.**

   The action plan attached at **Annex 2** is required as a condition of King's having signed the concordat and by funders when they are considering future awards of grants. An internal action plan is to be approved annually by College Council. On alternate years this action plan is also submitted for renewal of the HR Excellence in Research Award for external accreditation of our compliance, necessitating the same format for both. Academic Board recommends approval of the Action Plan.

For note

3.   **The Future of Online Education at King's**

Academic Board discussed the next phase of King's online education strategy and members offered comments and suggestions on the emerging new model. The model would need to meet a diverse range of needs and establish King's as a leader in online education as stated in the objectives of Vision 2029.

Challenges noted included: the rigidity of the current model and the contractual obligations have curtailed the ambition to develop new programmes; the need to expand in-house expertise in developing online content and pedagogy, recognising that online provision makes very different operational demands on academic and professional services staff; and the lack of diversity in current student base enrolled in programmes.

The Board held a wide-ranging discussion and the views would be taken into the next phase of development.

4.   **Strategy Refresh**

The key strategic directions approved by Council on 23 September 2022 were noted and Academic Board members offered comments and suggestions on the development of these into specific proposals. Specific proposals would return to Academic Board, other Council committees and Council at the appropriate times for individual approval.

5.   **Academic Workforce Report**

Academic Board discussed data on the King's academic workforce and benchmark data with other institutions which had been provided in response to discussions held at its previous meeting. The Board noted that consideration of mechanisms concerned with compliance with dismissal policies would be included in the 5-yearly governance review next scheduled for 2023.

6.   **Academic Board Sub-Committee reports**

Reports approved and noted:

6.1   **Academic Board Operations Committee**

(i)   CEC Terms of Reference minor amendments **(Approved)**

6.2   **College Education Committee**

(i)   Professional, Statutory & Regulatory Body policy **(Approved)**
(ii)   CEC Schedule of Business 2022/23 **(Approved)**
(iii)   King's International Foundation condonement **(Approved)**
(iv)   Degree Outcomes Statement 2020/21 (**Noted**)
(v)   Academic Regulations 2022/23 (**Noted**)
(vi)   Periodic Programme Review – revised process (**Noted**)
(vii)   Macadam level 3 Project 2022/23 (**Noted**)
(viii)   College Teaching Fund – final year report 2021/22 **(Noted)**
(ix)   Harassment & Sexual Misconduct (**Noted**)
(x)   Review of practice – Abrahart (Bristol) case (**Noted**)
(xi)   Examinations & Assessment delivery update 2021/22 (**Noted**)
(xii)   Academic Misconduct – paper for Faculty discussion (**Noted**)
(xiii)   CEC Schedule of Business 2021/22 (**Noted**)
(xiv)   Module Evaluation overview 2021/22 response rates (**Noted**)
(xv)   PGT Assessment Board Annual Report 2020/21 (**Noted**)
(xvi)   ASSC Schedule of Business 2021/22, 2022/23 and Membership 2022/23 (**Noted**)
(xx)   Programme Development & Approval Sub-Committee (**Noted**)
(xxi)   Collaborative Provision Sub-Committee (**Noted**)

(xxii) NSS Overview/Update (**Noted)**

(xxiii) TEF Provider Submission (**Noted)**

(xxiv) Equality, Diversity & Inclusion update (**Noted)**

(xxv) King's College London Strategy 2026 (**Noted)**

(xxvi) Update on the start of the Academic year 22/23 (**Noted)**

(xxvii) Learning Environments Working Group (**Noted)**

(xxviii) Professional Statutory and Regulatory Body activity (**Noted)**

(xxix) Fair Admissions Policy Statement (**Noted)**

(xxx) Executive MBA – Terms & Conditions **(Approved)**

(xxxi) Statement for Exams Periods 1, 2 and 3 **(Noted)**

(xxxii) Academic Regulations **(Academic Board approved delegation of authority to give final approval of the academic regulations 2022/2023 to the College Education Committee**)

6.3   College Research Committee:

(i)   King's Research Strategy Refresh **(Noted)**

(ii)   NMES Research Strategy **(Noted)**

(iii)   Digital Research Strategy **(Noted)**

(iv)   Digital Futures Institute **(Noted)**

(v)   PGR Stipends **(Noted)**

(vi)   Research Integrity: Research Misconduct Procedure **(Approved)**

(vii)   Libraries & Collections: Research Publications Policy **(Approved)**

7.   Other items approved or noted

(i)   Principal's report on key current matters **(Noted)**

(ii)   KCLSU President's report **(Noted)**

(iii)   The Dean's report **(Noted)**

(iv)   Election of Associates of King's College (AKC) (**approved**)

(v)   Report from Council **(Noted)**

Annual report to Council: ongoing conditions of registration for Office for Students 2022/23

To note: Following CEC consideration, the report has been updated following the OfS release of the data dashboard.

Introduction

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 revised conditions since the initial registration process.

Governing bodies of universities also have a requirement to receive assurance that the College is meeting the conditions set out by regulatory and funding bodies. The CUC[2] 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'.

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 2021/22 (see appendix 2). Where applicable updates on previously reported KPI's[3] are included in the report.
- An update on any changes to conditions of initial registration, introduced by OfS during 2021/22.

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

Currently, failure to comply with these ongoing conditions of registration will result in the OfS contacting the institution directly or asking the QAA[4] to conduct a Quality and Standards Review[5]. This review is the process QAA will use to provide evidence to the OfS about whether providers referred by the OfS are meeting one or more of the Core Practices of the UK Quality Code for Higher Education (the Quality Code). Additionally, 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 provider[6].

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[1] Office for Students: Securing Secret Success: Regulatory framework for higher education in England
[2] Committee of University Chairs: https://www.universitychairs.ac.uk/wp-content/files/2018/06/CUC-HE-Code-of-Governance-publication-final.pdf
[3] Key Performance Indicators
[4] Quality Assurance Agency in Higher Education
[5] From March 2023 the QAA steps down from the Designated Quality Body. We have yet to hear who will replace the QAA in this role and what the mechanism may be.
[6] https://www.officeforstudents.org.uk/publications/regulatory-advice-19-the-ofs-s-approach-to-determining-the-amount-of-a-monetary-penalty/

OfS Oversight Committee

The College's OfS Oversight Committee continues to have oversight of OfS activity. The Committee has reviewed and where it was deemed appropriate[7] inputted into the following consultations during the year:

- Revised and new[8] B conditions Quality and Standards (excluding B3: Student Outcomes) (final outcome from the consultation was published March 2022 for implementation 1st May 2022, see Appendix 2 for further information)
- A new approach to regulating student outcomes (B3 Condition: Student Outcomes)
- Teaching Excellence Framework (TEF)
- Constructing student outcome and experience indicators
- Suitability of Jisc as the designated data body
- Data futures and data collection
- OfS Strategy for 2022-25
- Changes to the National Student Survey

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[7] 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.

[8] The new conditions relate to new providers registering with OfS, and are therefore not relevant to King's College London

Annual report to Council: ongoing conditions of registration for Office for Students 2022/23

Section A: Office for Students Ongoing Conditions of Registration

The OfS regulatory framework[1] 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].

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
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:
	  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 2021/22 monitoring and APP renewal.

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:
	  i. Publish an access and participation statement.
	  ii. Update and re-publish this statement on an annual basis.
		Y	n/a

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

Condition B1: Academic Experience [revised]	The provider must ensure that the students registered on each higher education course receive a high quality experience, ensuring the following:
	  • Each higher education course is up to date
	  • Each higher education course provides educational challenge
		Y	See appendix 2 for update on how this was managed during 2021/22

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

	• 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.		

Condition B2: Resources, support and student engagement [revised]	The provider must take all reasonable steps to ensure:
	• Each cohort of students registered on each higher education course receives resources and support which are sufficient for the purpose of ensuring:
	  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:
	  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 2021/22

Condition B3: Student Outcome [revised]	The provider must deliver positive outcomes for students on its higher education courses.	Y	See appendix 2 for the summary of the new benchmarks.
Condition B4: Assessment and awards [revised]	The provider must ensure that: • 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 course[2]; 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 2021/22
Condition B5; Sector-recognised standards [revised]	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);	Y	See appendix 2 for update on how this was managed during 2021/22

[2] 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.

	• Any standards set appropriately reflect any applicable sector-recognised standards; and • Awards are only granted to students whose knowledge and skills appropriately reflect any applicable sector-recognised standards.		
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 TEF
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 2021/22
Condition C2: Student complaints scheme	The provider must: 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 2021/22
Condition C3: Student protection plan	The provider must: i. Have in force and publish a student protection plan which has been approved by the OfS as appropriate for its assessment of the regulatory risk presented by the provider and for the risk to continuation of study of all of its students. ii. Take all reasonable steps to implement the provisions of the plan if the events set out in the plan take place. Inform the OfS of events, except for the closure of an individual course, that require the implementation of the provisions of the plan.	Y	See appendix 3 for update on how this was managed during 2021/22
Condition C4: Student protection directions	Student protection directions[3] 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").	Y	n/a

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

D: Financial sustainability			
Condition D: Financial viability and sustainability	The provider must: i. Be financially viable. ii. Be financially sustainable. 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. iv. Have the necessary financial resources to continue to comply with all conditions of its registration.	Y	n/a
E: Good governance			
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
Condition E2: Management and governance	The provider must have in place adequate and effective management and governance arrangements to: 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. Continue to comply with all conditions of its registration.	Y	n/a
Condition E3: Accountability	The governing body of a provider must: 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. Nominate to the OfS a senior officer as the 'accountable officer' who has the responsibilities set out by the OfS for an accountable officer from time to time.	Y	n/a
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
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	n/a
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

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
Condition F3: Provision of information to the OfS	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: 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. The requirements in paragraphs (ii) and (iii) do not affect the generality of the requirement in paragraph (i).	Y	See appendix 5
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
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
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
Condition G3: Payment of	The provider must pay:	Y	See appendix 6

OfS and designated body fees	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.		

Conclusion

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

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

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

The OfS approved the 2020/21-2024/25 Access & Participation Plan, which is automatically rolled over each year subject to satisfactory progress. The 2020-2025 APP OfS approval initially came with an 'enhanced monitoring' requirement. This was satisfactorily concluded and removed in 2021. In spring 2022 the Director of Fair Access and Participation (OfS) wrote to the Principal as Accountable Officer to confirm that the approval of our Access & Participation Plan will roll over for the 2022/23 academic year given our satisfactory performance. Should circumstances change during the academic year and/or subject to the monitoring completed for 2021/22, then the OfS can revisit this decision. 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.

Following the 2022/23 admissions cycle, we are on course to meet or exceed all of our APP targets relating to fair access and reducing the gaps in entry between students from the most and least disadvantaged areas of the country.

The OfS appointed a new Director of Fair Access in January 2022. The new Director set out four new priorities for universities to focus on in their APP. As such, all providers had to submit a 'variation request' to their agreed APPs to commence from 2023/24. These had to provide detail on the following areas, alongside a demonstrable commitment to evaluation:

1. Working more strategically with schools to improve pupil attainment.
2. Provision of alternative routes such as Degree Apprenticeships and vocational pathways.
3. Ensuring APP provision is linked more closely to quality assurance.
4. Simpler and more accessible APPs.

The APP variation was submitted to the OfS in July 2022 and we are awaiting the outcome. A paper was sent to Council noting our approach and how we satisfy each of these requirements at the July meeting. A completely new APP will be submitted to commence in 2024/25. We expect OfS guidance on this in winter 2022, with submission in spring 2023. This is a timely point, given the opportunity to align with Strategy 2026 and a new three-year Widening Participation strategy. We would anticipate reviewing our targets, areas of priority and greatest impact, and our provision of financial support to the most disadvantaged students. A new investment plan to achieve our stated aims may be required. This will be overseen by the Associate Director of Social Mobility & Widening Participation on behalf of the Vice Principal (Education & Student Success) and the President and Principal as Accountable Officer, engaging with relevant areas across King's as required.

In line with OfS requirements, the APP is hosted on King's website here:
https://www.kcl.ac.uk/study/widening-participation/ofs

The Associate Director of Social Mobility & Widening Participation has oversight of the APP. Reporting is via the Social Mobility steering group and to the University Executive for activity relating to Vision 2029 delivery and to Council for activity relating to academic policies and practice.

Annex 2: Condition B update: Quality and Standards

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.[4] 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, including asking the Designated Quality Body (DQB) to undertake a review. 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 are expecting to hold a "readiness" check for the College's new Integrated Degree Apprenticeship: MSc Clinical Pharmacology, where the College is due to be the End-Point-Assessment for the apprenticeship. This check is expected to be undertaken by the Quality Assurance Agency for Higher Education (QAA) and timescales are expected to be communicated to the College in the autumn term.

The QAA announced on 20th July 2022 that they would be stepping down from the DQB role after 31st March 2023, due to the QAA perceiving that the OfS current regulatory approach in England is not consistent with standard international practice for quality bodies, as reflected in the European Standards and Guidelines (ESG). The QAA had recently been temporarily suspended from the European Quality Assurance Register for Higher Education (EQAR), which is based on the ESG, citing areas of non-compliance in England. While the OfS work with sector bodies such as the Universities UK to determine who could undertake this DQB role from April 2023, there are concerns with the QAA decision and how this may impact our international relationships (current and prospective relationships) if our international partners (and the Countries Ministry of Education they reside in) determine that English providers are not following the ESG. The OfS have always claimed that they feel that English providers do fulfil the ESG requirements but with the QAA's statement[5] this may now be questioned by our current and future partners, particularly where we have jointly awarded programmes and whether the Country/partner will recognise the degree awarded in England. This is an area therefore that should be kept under review and conversations with QAA and OfS should continue to help inform our decisions of action to take after March 2023.

The OfS undertook a substantial consultation on revised and new conditions of registration for Quality and Standards, with Condition B3 (Student outcomes) and Condition B6: Teaching Excellence Framework (TEF) being separate to the consultation on the other conditions relating to quality[6]. For those conditions B1 – B5 the outcomes were published in March 2022, for implementation May 2022. A mapping exercise of how King's continues to meet these revised conditions, identifying any gaps and/or actions to be completed was undertaken and reported to Academic Standards Sub-Committee (paper ref: ASSC: 21/22: 77) and College Education Committee (paper ref: CEC: 21/22: 110) in June and July respectively.

In light of these revised conditions, which now covers *all* awards of the College, this annual report to Council now covers: taught awards for programmes of King's (UG and PGT); research awards; and awards of our validated partners (RADA and Inns of Court College of Advocacy (ICCA)). Work is progressing with our validated partners on mapping the new conditions of registration against their quality activities, but at the annual meetings with the partners, all of the revised conditions of registration are already discussed as part of our process for monitoring our validated provision.

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 2021/22 demonstrates this commitment to continue to meet the conditions of Condition B: Quality and Standards for all students:

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[4] https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports/King-s-College-London
[5] https://www.qaa.ac.uk/news-events/news/qaa-demits-dqb-status-to-focus-on-sector-and-students-in-england
[6] The outcomes from these two consultations were published end of July 2022.

Condition B1: high academic experience

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 student's in their chosen subject.

The following aids the College 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.
- Our procedure, 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.
- When programmes are developed, they have to develop their programmes in accordance to:
    - Framework for Higher Education Qualifications (FHEQ)
    - 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.

The OfS have also introduced under this condition reference to ensure skills being assessed include "technical proficiency in the English language". King's manages this via both the current College marking criteria and new marking criteria, which refers to marking assessments considering English language, noting the following:

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)

There is also a system in place to identify students with certain learning disabilities that may be impacted by this condition. Where students have been identified with these learning disabilities, markers will then take this into consideration when they mark.

Work continues on implementing the Education Strategy 2017 – 2022, which will provide our students with a high-academic experience and enable a student's achievement to be reliably assessed in future year. During 2021/22 the following updates were reported to College Education Committee and Academic Board (where appropriate):

- King's First Year: Gateway to King's progressed with the module gaining approval from Programme Development and Approval Sub-Committee in December 2021 (paper ref: PDASC: 21/22: 22). Programmes have been identified to pilot the module in 2022/23. The module was launched w/c 26th September 2022 and will be kept under review.

- Flexible curriculum: a proposal to incorporate King's First Year: Gateway to King's into the interdisciplinary minor was discussed and approved at College Education Committee in May 2022 (paper ref: CEC: 21/22: 86). Included in this proposal was the introduction of a key-stone module in year two that students would need to take if they wished to undertake an interdisciplinary themed minor, and a capstone module in year three. Work is now underway to develop these key-stone modules, ready for piloting 2024-25.
- Curriculum Commission met in March 2022 and continued to receive updates on how Faculties are progressing with their implementation of outcomes from Curriculum Commission.
- The UG Progression and Award Policy, previously approved by Academic Board in 2020, was incorporated into the academic regulations for 2022/23 and work has commenced on operationalizing the new regulations. Two faculties (King's Business School and Faculty of Life Science and Medicine) will undertake the 1st stage of delivering with the new regulations by automating progression from 2022/23. An external consultant company has been brought in to assist the College in setting up our systems to enable this automation to occur.
- The Academic Standards Sub-Committee approved in November 2021 a revised marking framework, and revised marking criteria (taking into consideration the QAA level 6 qualification outcome descriptors). Included in this framework is an introduction of stepped marking, and pilots will be run during 2022/23 with interested programmes.
- A pilot was run in Assessment Period 2 with a company called TEAMCO, where invigilated online assessments were held in an examination hall. Outcome from the pilot will be reported to Academic Standards Sub-Committee and College Education Committee at its first meetings in 2022/23.
- A proposal for a micro-credential stackable programme received final approval by Programme Development and Approval Sub-Committee at its meeting in July 2022 (paper ref: PDASC: 21/22: 80). This PGT programme is a CPD programme that enables students to undertake micro-credential modules during x period of time, and when they determine they wish to enrol onto a programme to gain an award in recognition of this study, the programme is ready for the student to enrol onto. A portfolio committee is being established in the School of Professional and Continuing Education to develop these micro-credentials further.

Measures that had previously been in place (for UG and PGT) to manage the Covid pandemic were discontinued and the College returned to pre-pandemic regulations, e.g., mitigating circumstances process returned to requiring evidence to be submitted alongside the claim; while some assessments continued to be held remotely many programmes returned to a fixed-time format, rather than continue with the 24-hour format; and progression rules returned to those as noted in the regulations.

For research degrees, during the Covid pandemic online viva examinations were introduced. The Research Degrees Examination Board (RDEB) agreed in June 2022 that the option of hybrid examinations should remain to offer as much flexibility as possible. Face-to-face examinations were on the rise and had increased by 10% between September 2021 and June 2022 and that fully remote examinations had decreased by 10% in that period. Hybrid examinations increased from 5% to 7%. To ensure compliance supervisors must complete the oral examination consent form.

Student's Academic Experience
Students' academic experience is monitored by King's via student surveys, including the National Student Survey, Postgraduate Taught Experience Survey and Postgraduate Research Experience Survey[7]. The following outlines the response we had with these student surveys that ran during 2022:

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[7] PRES did not run in 2022 as this is an bi-annual survey

Indicator	Result	Benchmark (average across Russell Group)	Benchmark against sector	RAG rating[i]
NSS 2022 overall satisfaction	71.1%	76%	76.3%	
PTES 2022 overall satisfaction	81%	81%	82%	

National Student Survey (NSS) 2022

Disappointingly the responses to the NSS showed a further decrease in satisfaction from last year, down 2.3%. This means in terms of OfS we are once again *significantly below the benchmark[8]*, which is likely to be a concern for the OfS as we are 5.2% below the sector benchmark. King's position in the Russell Group has dropped down two places, but still remains in a better position than 2020 when we were bottom of the group for overall satisfaction. It should be noted though that there are however significant similarities between the shift in results at King's and the sector more generally.

The breakdown of the survey results by various demographics show there are some areas where satisfaction rates have improved compared to last year, including amongst EU domiciled students and Mature students. However, there are some areas in which satisfaction gaps between different parts of the student population continue to grow which requires urgent further investigation and consideration.

The one section in NSS where we have seen a significant improvement in satisfaction relates to learning resources, increasing by 6.5% up to 80.1% (sector benchmark is 80.9%).

The following areas are where King's has received results that are *"not significantly different to the benchmark"* in terms of OfS findings[9] (all other questions were *"significantly below the benchmark"*):

- All bar one question on "Teaching on my course category"
- All bar one question on "Learning opportunities"
- One question on "Academic Support" (the question related to contacting staff when needed to)
- All questions on "Learning Resources"
- One question on "Student voice" (the question related to having the right opportunities to provide feedback)

In terms of the overall University results, the highest scoring question come from the teaching section, with 84.3% of students agreeing that "*the course is intellectually stimulating*".

Questions in the Sections "Organisation & management" and "Assessment & feedback" are prominent amongst the questions with the lowest satisfaction rates. The question "*it is clear how students' feedback has been acted upon*" received the lowest satisfaction level with just 41% of respondents agreeing.

There is considerable variation in the results at Faculty, Subject and Course level. There are a number of areas where satisfaction levels have increased substantially compared to previous years. In some case it is in terms of specific sections of the survey but often the improvement has been seen right across the survey questions.

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[8] Last year, for the first time since this classification has been introduced, we were classed as "not significantly different to the benchmark"

[9] https://www.officeforstudents.org.uk/advice-and-guidance/student-information-and-data/national-student-survey-nss/nss-data-provider-level/

At faculty level, King's Business School and Institute of Psychiatry, Psychology and Neuroscience have seen significant increases in overall satisfaction compared to last year, up 9.6% and 6.8%. Law achieved an increase in satisfaction rates across every section of the survey. The remaining faculties have seen decreases of between 1% and 5%. The one exception is FoDOCS, which experienced a much more considerable drop in the latest results.

At a department and course level there are excellent results spread across the faculties. Areas with overall satisfaction at or above 85% include Accounting & Finance, Economics & Management, History & International Relations, Pharmacy, Politics, Psychology, Sport & Exercise Medical Sciences, and War Studies.

The University Executive have approved the following actions to be undertaken in light of these results:
- Initial review workshops to be held with each faculty in August/September to identify immediate actions, ensure that mechanisms for continuous improvement are in place, and to identify any departments/ programmes where a deeper dive review may be necessary.

- Undertake 5-6 deep dive/ focused reviews in prioritised programmes or departments. The methodology used for the recent review in the Faculty of Nursing, Midwifery and Palliative Care is an appropriate template, with a review panel with both internal and external membership focused on specific categories of NSS that had been stubbornly low.

- Update (Programme) Continuous Enhancement Plan guidance to make explicit the need to respond to highlighted areas in NSS outcomes.

- Continue to work with faculties and KCLSU on strengthening student representation, voice and engagement to create a culture of positive feedback loops, strengthening academic representation training, officer induction and faculty 'King's 100' style forums and explore the potential use of Unitu https://unitu.co.uk/. Introduce a PS lead role for 'student voice', with a particular responsibility for NSS and PTES.

Postgraduate Taught Students Survey (PTES) 2022
In comparison to the NSS results, PTES saw a significant rise in 2022, with overall satisfaction rising 10%. Results in every question theme saw an increase, and overall approval rates increased in almost all faculties. Notably, the Resources section of the survey saw a substantial increase this year, achieving an 89% agree rating, exceeding pre-pandemic results. The "Teaching and Learning" section of the survey received overall satisfaction response of 83%, an increase of 5% from 2021, indicating a return to pre-pandemic response, which in 2019 was 85%; while the "Skills Development" section of the survey saw an increase of 9%, up to 78%, which also indicates a return to pre-pandemic responses, which in 2019 was 78%.

The section receiving the lowest satisfaction scores is "Assessment and Feedback" at 73%, and indicates another return to pre-pandemic results, which in 2019 was 73%, with 2018 having 71% satisfaction. This is in comparison to NSS result of overall satisfaction in this area at 58%.

Unlike the NSS, the OfS does not currently benchmark PTES satisfaction, so it is difficult to determine how the OfS perceives PTES results in terms of meeting this condition of registration but based on the overall satisfaction result benchmarked against the sector, we can presume we would not fall under a category of "significantly below the benchmark" as we are only 1% below the sector benchmark. When looking at benchmark against universities in London we are on par with them, as well as being on par with the satisfaction benchmarked for universities in the Russell Group.

Postgraduate Research Experience Survey (PRES)
The PRES is a bi-annual survey and was last run in 2021. Despite the challenges of the pandemic, overall satisfaction amongst King's PGR students remained stable at 79%, equivalent to the 2019 outcome. This level of satisfaction is also equivalent to the London and Russell Group averages, with the Russell Group average having fallen slightly from 81% two years ago. As is typically the case, the London average is slightly below the sector average of 80%.

Faculties were asked to submit a PRES 2021 action plan with their annual report in January 2022 (which were discussed at Postgraduate Research Students Sub-committee (PRSS) in March 2022. Further updates on individual actions identified from faculties will be discussed at the October 2022 PRSS meeting.

We reported last year that overall satisfaction rates were lower in students from Black and ethnic minority backgrounds and students who declared a disability. This provided us further impetus, if it were really needed, for actions relating to PGR EDI issues.

Via the annual reports Faculties are required to report any PGR EDI issues and what they are doing to mitigate them, for example:
- Faculty of Arts and Humanities is committed to developing better mentorship structures and networks for students from underrepresented communities and to profiling their research achievements. It is working on implementing these goals in the context of ongoing work on the website and EDI support networks.
- Faculty of Natural, Mathematical & Engineering Sciences has created the EDI student forum which includes PGR students from all faculties, and they have a Gender Equality Student Fund available for PGR student initiatives and activities that support the promotion of gender equality in STEM fields.
- Faculty of Nursing, Midwifery & Palliative Care has appointed a new Equality, Diversity and Inclusion (EDI) officer from the PGR coordinator team to support PGR students, who have joint responsibility for representing EDI issues within one of our research divisions and for PGR.

To address issues raised by less abled students the Centre for Doctoral studies took active steps to commission a PGR disability project. This project aims to action some of the recommendations made in the 2021 PGR Disability Review and Recommendations policy paper presented at an earlier PRSS meeting (PRSS2021.13) on behalf of the PGR Equality, Diversity and Inclusion Task and Finish Group.

Lienkie Diedericks has been appointed on a part time basis to take forward some of the recommendations from the review.

Key achievements from this project so far:
- Consulting and awareness-making around PGR and disability issues. An email was sent to all Faculty Associate Deans on behalf of Professor Richard Trembath, Chair of the Disability Inclusion Steering Group. Contact and insights gained from key stakeholders.
- Amended key guidance documents for students and supervisors including working on the progress reports to provide students with space to note any adjustments that they may need.
- Created an online PGR Disability Support Hub (https://emckclac.sharepoint.com/sites/PGRWH/SitePages/PGR_Disability_Support_Hub.aspx)within the Centre for Doctoral Studies' Wellbeing Hub.
- Communications campaign was successfully run from the 5th to the 9th of September 2022. This included:
    - Launch of the PGR Disability Hub with an online Open Forum Q&A with key stakeholders, disabled PGRs and interested faculty. Monday 5 September.
    - In person meet and greet for disabled PGRs, interested faculty and supervisors, Monday 5 September and Wednesday 7th of September
    - A series of online webinars, live every lunchtime (12h30-13h00) between Tuesday 6th and Friday the 9th of September.

Further work planned in this area include:

- Disabled PGR online focus group to gain in-depth qualitative data on disabled PGR experience. Ethics approval has been granted and it's estimated this work will proceed in February 2023.
- Finding and actioning an alternative to the King's Inclusion Plan which better suits the dynamic needs of the PGR student (as opposed to a taught student).
- Setting up a London university-wide Disabled PGR Network.
- Developing and providing disability-specific supervisory training.

Validated partners
When considering survey responses from our validated partners, we can report the following:

NSS 2022:
RADA have seen a fall in overall satisfaction since 2021 (down to 78.57% from 87.80%) and have moved from being "*significantly above benchmark*" to "*not significantly different to benchmark*". There has also been a significant drop in satisfaction relating to the question on "marking and assessment has been fair" – from 78.05% in 2021 to 66.67% in 2022, but the results continue to remain in the category of "*not significantly different to benchmark*". The question relating to "well organized and running smoothly" has significantly dropped to 25.93%, (2021 results were 43.90%) which is now "*significantly below the benchmark*".

Similar to King's the section on Learning Resources has seen some increases in satisfaction.

At the annual meeting to be held during 2022/23 we will discuss with RADA their NSS results and what action (if any) is being taken in light of recent NSS results, but it should be noted that RADA's cohort is relatively small so may have some impact on the changes being seen.

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

PTES 2022
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.

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

Assurance can be given that King's adheres to this condition for all its programmes (taught and research), via the following mechanisms[10]:
- Personal tutors
- Supervisors
- Learning support via the library, disability team, including consideration of personalized examination arrangements

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

- 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.

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.

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).

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.

The revised OfS condition of registration has expanded it 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 Honesty and Integrity 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.
- 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".
- 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 Honesty and Integrity 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.

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 Collaborative Provision Sub-Committee. 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

As part of the revised condition of registration for Student Outcomes, the OfS has produced 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)[11]. The OfS have made a judgement whether a provider has achieved positive outcomes for its students, and 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 provider is operating nevertheless justifies the provider's outcomes, in that they nevertheless represent positive outcomes for its students.

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 in the near future.

King's metrics

The OfS produced a set of metrics and benchmarks that determine how King's is meeting this ongoing condition of registration. Based on the overview[12] data assurance can be given that King's meets the OfS thresholds in all areas bar the continuation category for Part-time, Other UG. This category however covers the free-standing modules run in the Faculty of Nursing. Midwifery and Palliative Care and are not classed as a programme of study. Conversations have been held with OfS regarding this inclusion as the modules are not technically leading to an award.

The following provides an overview of how the College is benchmarked against the OfS split indicators. While broadly in line with benchmarks there are some areas that are just below the benchmark (in a lot of cases below 1% of the benchmark), and the category of Undergraduate with PG Components are below the benchmark in the majority of categories[13]. This should be reviewed to gain an understanding of why this may be the case e.g., is it the way we report these programmes to HESA.

Full time programmes

- Continuation: for all the levels of study, bar the category of "undergraduate with postgraduate study", King's is above the OfS benchmark. For that one category we are below the benchmark by 0.4%.
- Continuation by subject area: breaking down to subject level the majority of subject areas (for a First Degree (BA/BSc) programme) are above the benchmark but there are a small minority of areas that are just below the benchmark (Design, and Creative and Performing Arts, Humanities and languages, Natural and Mathematical Sciences, and Nursing, allied health and psychology). Those programmes that are UG with a PG component are all below the benchmark, bar Computing, and Medicine and Dentistry. Those programmes below the benchmark should be kept under review in light of the data, including considering how these programmes are reported on.
- Continuation by characteristics: Age on entry: for First Degree (BA/BSc) programmes we are above the benchmark for students aged under 21 years and 21 – 30 years, however we are below the

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[11] The release of the data was 30th September 2022
[12] https://www.officeforstudents.org.uk/data-and-analysis/student-outcomes-data-dashboard/data-dashboard/
[13] In comparison to the data received as part of the consultation exercise however there has been a slight improvement in the data.

benchmark by 0.7% for students aged 31 and above. For programmes that are UG with PG component we are below the benchmark for all categories.

- Continuation by characteristics: Disability reported: for First Degree (BA/BSc) programmes we are below the benchmark by 0.6%, however we are above the benchmark for programmes that are UG with PG Component. No disability reported category is however the reverse.
- Continuation by characteristics: BAME: for both First Degree (BA/BSc) and programmes that are UG with PG component we are below the benchmark bar BA/BSc programme under the White category and programmes that are UG with PG component the Black category. While we are under the benchmark, we are in fact not far off the benchmark (varies from 0.1 – 0.8 from the benchmark). However, this should be kept under review to ensure we don't decline further.
- Continuation by characteristics: Gender: while we are above the benchmark for the First Degree (BA/BSc) category, we are below the benchmark for both Male and Female in the category programmes that UG with PG component.
- Continuation by ABCS[14] Quintile: for First Degree (BA/BSc) programmes we are above the benchmark for all categories bar Quintile 4 or Quintile 5; while for programmes that are UG with PG components we are below the benchmark bar for the category Quintile 2 or Quintile 3 only.
- Continuation by Deprivation Quintile: for First Degree (BA/BSc) programmes we are above the benchmark for all categories bar Quintile 3, 4 or Quintile 5, while for programmes that are UG with PG components we are below the benchmark for all the Quintiles.
- Continuation by Domicile: for both First Degree (BA/BSc) programmes and programmes that are UG with PG components we are below the benchmark for all categories (by 0.1% for BA/BSc and 0.5% for UG with PG components).
- Continuation by Free School meals: we are below the benchmark by 0.8% for First Degree (BA/BSc) programmes in the Not eligible category.
- Completion: for all the levels of study, bar the category of "undergraduate with postgraduate study", King's is above the OfS benchmark. For the one category we are below the benchmark by 0.8%.
- Completion by subject area: breaking down to subject area the majority of subject areas for First Degree (BA/BSc) are above the benchmark, but there a small minority of subject areas below the benchmark (in many cases, by a small margin) (Performing Arts, English studies; History and archaeology; Media, journalism and communication studies; Physics and astronomy; and Medical studies). Those programmes that are UG with a PG component are all, bar Engineering, below the benchmark.
- Completion by characteristics: Age on entry: for First Degree (BA/BSc) programmes we are above the benchmark for students aged under 21 years, and 21 – 30 years, however we are below the benchmark by 0.5% for students aged 31 and above. For programmes that are UG with PG component we are below the benchmark for all categories.
- Completion by characteristics: Disability reported: for First Degree (BA/BSc) programmes we are above the benchmark for both categories, however we are below the benchmark for programmes that are UG with PG Component for both categories[15].
- Completion by characteristics: BAME: for First Degree (BA/BSc) we are above the benchmarks for all categories bar Asian and Other (and these are below the benchmark by less than 1%). For programmes that are UG with PG components we are below the target for all categories bar Mixed (again these are below the benchmark by less than 1%).
- Completion by characteristics: Gender: while we are above the benchmark for the Other UG and First Degree (BA/BSc) category, we are below the benchmark for both Male and Female in the category programmes that UG with PG component.

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[14] Associations between characteristics of students quintile
[15] 5% below benchmark for Disability reported and 0.4% for No disability reported

- Completion by ABCS Quintile: where there is data for this category, for First Degree (BA/BSc) programmes we are above the benchmark bar Quintile 4 or Quintile 5, while for programmes that are UG with PG components we are below the benchmark for all categories.
- Completion by Deprivation Quintile: where there is data for this category, for First Degree (BA/BSc) programmes we are above the benchmark, while for programmes that are UG with PG components we are below the benchmark for all categories.
- Completion by Domicile: where there is data for this category, for First Degree (BA/BSc) programmes we are above the benchmark, while for programmes that are UG with PG components we are below the benchmark for all categories.
- Completion by Free School meals: we are below the benchmark by 0.4% for First Degree (BA/BSc) for those not eligible.
- Progression: for all the levels of study, bar the category of "undergraduate with postgraduate study", King's is above the OfS benchmark. For the one category we are below the benchmark by 2.3%.
- Progression by subject area: breaking down to subject area the majority of subject areas for First Degree (BA/BSc) we are above the benchmark, but there a small minority of subject areas below the benchmark (in many cases, by a small margin) (Media, journalism and communication studies; Geography, earth and environmental studies; Chemistry; Mathematical studies; Physics and astronomy; Allied health; Medical sciences, and Pharmacology, toxicology and pharmacy). Those programmes that are UG with a PG component have one subject area above the benchmark (Biosciences), but the following are below the benchmark: Medicine and dentistry (1.4% below the benchmark); Chemistry (5.5%), Mathematical Sciences (6.6%), Physics and astronomy (9.4% below the benchmark); and Pharmacology, toxicology and pharmacy (5.0% below the benchmark).
- Progression by characteristics: Age on entry: for First Degree (BA/BSc) programmes we are above the benchmark for all categories, however for programmes that are UG with PG component we are below the benchmark.
- Progression by characteristics: Disability reported: for First Degree (BA/BSc) programmes we are above the benchmark for both categories, however we are below the benchmark for programmes that are UG with PG Component for the category No disability reported (2.7%).
- Progression by characteristics: BAME: for First Degree (BA/BSc) we are above the benchmarks for all categories bar Black (0.1% below). For programmes that are UG with PG components we are below the target for all categories (with Asian category being 3.0% below the benchmark, versus Other and White below benchmark by 0.4%).
- Progression by characteristics: Gender: while we are above the benchmark for the First Degree (BA/BSc) category, we are below the benchmark for both Male and Female in the category programmes that are UG with PG component.
- Progression by ABCS Quintile: for First Degree (BA/BSc) programmes we are above the benchmark for all categories, while for programmes that are UG with PG components we are below the benchmark for all categories.
- Progression by Deprivation Quintile: for First Degree (BA/BSc) programmes we are above the benchmark for all categories, while for programmes that are UG with PG components we are below the benchmark for all categories.
- Progression by Domicile: where there is data for this category, for First Degree (BA/BSc) programmes we are above the benchmark, while for programmes that are UG with PG components we are below the benchmark (by 2.3%).
- Progression by Free School meals: we are below the benchmark by 0.2% for First Degree (BA/BSc) for those not eligible.

Part-time study (nursing modules)
- Continuation: for those First Degrees (BA/BSc) we are above the OfS benchmark, but for the category "other undergraduate" we are below the benchmark (by 39.3%).

- Continuation by characteristics: Age on entry: we are significantly below the benchmark bar[16] the category on First Degree (BA/BSc) for 21 to 30 years.
- Continuation by characteristics: Disability reported: we are below the benchmark for all categories ranging from 0.6 to 39.2% depending on category.
- Continuation by characteristics: BAME: for Other UG category we are below the benchmark for all areas ranging from 29.4% (Asian) to 43.4% (White), however for First Degree (BA/BSc) category, where there is data (bearing in mind these are low numbers so may not be reportable), we are above the benchmarks.
- Continuation by characteristics: Gender: for the category Other UG we are below the benchmark for both Male and Female (39.3 – 38.8% below benchmark), however for First Degree (BA/BSc) category we are above the benchmarks.
- Continuation by ABCS Quintile: we are below the benchmark for all categories reported against bar First Degree (BA/BSc) Quintile 4 or Quintile 5.
- Continuation by Deprivation Quintile: we are below the benchmark for all categories reported against bar First Degree (BA/BSc) Quintile 3, 4 or Quintile 5.
- Continuation by Domicile: where data is reported, we are below the benchmark for Other UG category (UK) but above the benchmark for First Degree (BA/BSc).
- Continuation by Free School meals: there is no data reported.
- Completion: for Other UG we are below the benchmark, but for First Degree (BA/BSc) we are above the benchmark.
- Completion by characteristics: Age on entry: we are below the benchmark bar for all categories relating to Other UG category, however for the category on First Degree (BA/BSc) we are above benchmark for ages Under 21 and 31 years and above.
- Completion by characteristics: Disability reported: we are below the benchmark for all categories bar the First Degree (BA/BSc) No disability reported, ranging from 6.1 to 7.3% depending on category.
- Completion by characteristics: BAME: for Other UG category we are below the benchmark for all areas ranging from 13.7% (Mixed) to 1.3% (Other), however for First Degree (BA/BSc) category, where there is data (bearing in mind these are low numbers so may not be reportable), we are above the benchmarks, bar the Black category.
- Completion by characteristics: Gender: for the category Other UG we are below the benchmark for both Male and Female (6.2 – 8.7% below benchmark), however for the First Degree (BA/BSc) category we are above the benchmark for Femail (5.4%) but below for Male (12.4%).
- Completion by ABCS Quintile: we are below the benchmark for all categories reported against bar First Degree (BA/BSc) Quintile 4 or Quintile 5.
- Completion by Deprivation Quintile: we are below the benchmark for all categories reported against bar First Degree (BA/BSc) Quintile 3, 4 or Quintile 5.
- Completion by Domicile: where data is reported, we are below the benchmark for Other UG category (UK and Non-Uk) but above the benchmark for First Degree (BA/BSc).
- Completion by Free School meals: there is no data reported.
- Progression: data is not available[17]

For Postgraduate taught programmes we have an indicator result of 93.9%, with no benchmark or split metrics recorded against. For Postgraduate research programmes we have an indicator result of 96.6%, but again with no benchmark or split metrics recorded against (though we are above the numerical threshold for both PGT and PG programmes).

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[16] Range from 1.3 to 39.8% below the benchmark depending on the category.
[17] Term used on the spreadsheet is DPH: data has been suppressed for data protection reasons, due to a numerator that is greater than 2 but is within 2 of the denominator

Link to periodic programme reviews

In 2022/23 the College is introducing a revised process for periodic programme reviews. While reviews will continue to be run on a 6-year cycle, a mechanism for early intervention has been introduced. This involves an annual meeting being held to review the OfS data with the indicators that the OfS will provide us, and where there may be concerns where the data is indicating performance below the benchmark, consideration will be had on whether an earlier programme review is required to take action in improving the metrics. Annual monitoring reports[18] will be considered alongside the OfS metrics to determine whether appropriate action has already been identified but impact from the action is not expected to be seen just yet. Where it is deemed early intervention is required, the faculty will be advised that they are required to complete a programme review in that academic year.

Graduate outcomes survey

We now have the results for the Graduate Outcomes Survey (GOS) for the 2019/20 leavers:

- 53.8% response rate (in comparison to 46% response rate in 2018/19). This survey continues to be operated centrally by HESA, so we are unable to engage with graduates directly when the survey starts, and therefore are unable to assist with encouraging engagement with the survey.

Of the approx. 6500 student who completed the survey:
- 69.5% were in highly skilled employment
- 80% believe the work they are doing is meaningful
- 67% believe they are using the skills they gained from their degrees in their work
- 76% believe they are on track with their future plans

Condition B4: Assessment and awards

Following the revisions, the OfS made to this condition of registration, and 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.
- "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 assessed.
- 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.
- 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

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[18] Called Continuous Enhancement Review

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 Academic Standards Sub-Committee.

- Our current and new marking framework note how to take into consideration when marking students' English language proficiency.

Awards review

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

UG:

For 2020/21, 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%	

While we have experienced a very small drop in awarding of good honours (0.1%), the benchmark against the Russell Group has seen a very small increase (1.2%), but this has balanced our awards, so we are now on par with the benchmark, where back in 2019/20 we were just slightly above the benchmark.

There is however some concern with our awarding of good honours over time, as we have significantly increased our awarding of 1st/2:1's in recent years (back in 2018/19 we awarded 86% of good honours, compared to the ca91% in 2020/21, and currently we are awarding ca45% of 1st, in comparison to 37.7% awarded in the sector). Though this concern is across the sector, we are keeping this under review and discussions have been held at Academic Standards Sub-Committee (November 2021 meeting and June 2022 meeting), and College Education Committee (July 2022 meeting), and the summary reports of External Examiner reports has also referenced the concerns raised by our External Examiners (see *External Examiners* section for more information). Some of the increase in the last two years can be attributed to mitigations put in place for Covid, including readjusting assessment to an online format (with many being open-book 24-hour exams), but as we have been steadily increasing our awards year on year a further in-depth review is being undertaken as part of our work with publishing a new Degree Outcome Statement by December 2022.

A small minority of programmes in 2021/2 piloted invigilated online examinations with a company called TEAMCO. This was in part to resolve the rise in misconduct cases seen in some subject areas when their assessments moved to remote online assessments, which also were raised as concerns in External Examiner reports. It is hoped that for those programmes the student profile may move back to pre-pandemic results.

PGT:

For 2020/21, the following table demonstrates PGT awards:

Indicator	Merit and Distinction Awards[19]
Percentage of awards 2020/21	91.1%
Percentage of 2017/18 – 2019/20	83.2%

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[19] Awards that were "passed" have not been included

While there is no benchmark comparison with the Russell group, the table above does show that there has been an increase of 7.9% in awarding of merit/distinctions in recent years. Some of this can be attributed to the mitigations put in place for covid, including re-introducing the 2% borderline rule (which had been discontinued by the College back in 2013/14), and the readjusted assessment format to online (similar to UG programmes). A paper went to the Academic Standards Sub-Committee (ASSC: 21/22: 42) on the impact the 2% borderline rule had with the awards, and showed that there was a clear link to grade inflation with this rule, particularly with Distinctions and the report to the Committee noted "during both period, there was an increase in the number of Distinctions awarded when the 2% boundary rule was applied, with an average difference of 7.5% in the pre-Covid period and 13.4% during the Covid period)". The conclusion from this report, which gained approval from the Committee, was to remove the 2% boundary rule and return to the rules pre-pandemic, as there had clearly been evidence of grade inflation seen with this introduction.

PGR

For 2019/20 and 2020/21, the following table demonstrates PGR awards:

	2019/20	2020/21
Final Awards (1st of the month)	612	568
First Time Passes	137	129
One Month Corrections	17	13
Minor Corrections (3 months)	343	337
Major Corrections (6 months)	87	70
Re-examination (18 months)	22	17
MPhil Recommended	5	1
Academic Fails	0	1

While there is no benchmark comparison with the Russell group, we are happy to report that we have had increase on both first time passes and minor corrections, these are considered best results.

As a result of continued review and policies and practices for admissions, student progression and monitoring during the registration both at University and Faculty level we are seeing a decrease on Major corrections (-1.89%), Re-examinations (-0.6), and MPhil only (-0.64) recommendations from 2019/20 awards.

Validated partners
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

			Year Of Study						Grand Total
CRSN	Award AYR	CLASS	2015/6	2016/7	2017/8	2018/9	2019/0	2020/1	
Theatre Costume	2017/8	PD[20]		3					3
		PM		1					1
	2018/9	PD			3				3

[20] Key: PM = Pass with Merit; PD = Pass with Distinction; P =Pass

CRSN	Award AYR	CLASS	2015/6	2016/7	2017/8	2018/9	2019/0	2020/1	Grand Total
		PM			1				1
	2020/1	PD				4	3		7
		PM					1		1
Theatre Costume Total				4	4	4	4		16
Theatre LAB	2017/8	P		13					13
	2018/9	P			16				16
	2019/0	P		1		16			17
	2020/1	P			1		16		17
	(blank)	(blank)			1	1			2
Theatre LAB Total				14	18	17	16		65
ACTING[21]	2017/8	P	26						26
	2018/9	P	1	24					25
	2019/0	P		3	24				27
	(blank)	(blank)			2	2	26	15	45
ACTING Total			27	27	26	2	26	15	123
Technical Theatre and Stage Management	2017/8	P		2					2
		PD		8					8
		PM		21					21
	2018/9	P		1	4				5
		PD			10				10
		PM			18				18
	2019/0	P		1		4			5
		PD				13			13
		PM				16			16
	2020/1	P				1	3		4
		PD					1		1
		PM					23		23
	(blank)	(blank)			4	1	3	23	31
Technical Theatre and Stage Management Total				33	36	35	30	23	157
Grand total			27	78	84	58	76	38	361

As this is the first time of reporting validated awards to Council, we have submitted the last 6-years of data, so a comparison can be viewed.

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

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.

ICCA
This validated provision only commenced in 2020/21 and therefore there is only the one-years of awards we can note, but the provision does have two entries:

Start Month	Enrolled students	Withdrawn students	Grand Total
April	**39**		**39**
Pass Distinction	4		4
Pass Merit	11		11
#N/A	24		24
Sep	**44**	**2**	**46**
Pass	4		4
Pass Distinction	3		3
Pass Merit	31		31
#N/A	6	2	8
Grand Total	**83**	**2**	**85**

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. The partner has advised us that they are expecting a higher number of students undertaking the programme moving forward so the award profile will be kept under review.

Assessment Working Group
In 2022, an Assessment Working Group was restructured under the new leadership of Dr Jayne Pearson, Academic Lead for Assessment, and Senior Lecturer in Education (King's Academy). Under this working group two further groups have been established to help take forward discussions and actions relating to assessment:
- Assessment Strategy Implementation Board (with faculty representatives) and
- Assessment Projects Oversight Board (with SED and other College stakeholders for business systems and processes)

In 2022/23 the working group are doing the following (though not particularly to try and resolve any perceived grade inflation, but in some cases, it is thought they may have an impact):

- A revised marking framework was approved in 2021/22, including introduction of stepped-marking, rather than using the current 0-100 marking scale. Pilots will be run in 2022/23 for stepped-marking and will be kept under review to see if this method of marking has any impact on mark profiles. Guidance will be provided to all those undertaking the pilots, and reporting of findings will be fed into Assessment Boards and Academic Standards Sub-Committee.
- Undertaking further work on procuring online invigilation examinations.
- Reviewing assessment feedback policies and suggesting some regulations/revisions to policy as deemed appropriate.
- Reviewing assessment practices, particularly inclusive assessment, in light of recent sector cases with students with mental health.

- Reviewing academic integrity, in liaison with work being undertaken by the Academic Standards Sub-Committee.

External examiners

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

External Examiner reports 2020/21		RAG rating
Undergraduate		
Percentage of External Examiner reports received[iii]	91%[22]	
Percentage of External Examiners who had received an induction[iv]	97%[23]	
Confirmation of assurance that academic standards are met[v]	88%[24]	
Percentage of external examiner reports which include a concern on academic standards[vi]	12%	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC[vii]	86%[25]	
Postgraduate		
Percentage of external examiner reports received[viii]	88%[26]	
Percentage of external examiners who had received an induction[ix]	88%[27]	
Confirmation of assurance that academic standards are met[x]	80%[28]	

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[22] Although slightly lower than usual, this is partially due to the staff in ARQS who would normally monitor this, left the team at a key part of the year, and while we recruited to the posts, there was some aspects of the external examiner process that we could not cover

[23] Two external examiners have not received induction due to admin staff shortages/changes due to Covid disruptions

[24] Those External Examiners who had raised concerns related to marking practices (reliance on external markers, for example), quality of feedback noting inconsistencies, too many markers per module etc. A new marking framework is being introduced in 2022/23 that may resolve some of these concerns, but this will be kept under review

[25] Although slightly lower than usual, this is partially due to the staff in ARQS who would normally monitor this, left the team at a key part of the year, and while we recruited to the posts, there was some aspects of the external examiner process that we could not cover

[26] Although lower than usual, those missing reports are due to external examiners undertaking strike action at a time when the reports were due to be submitted.

[27] Some reports are still outstanding from those new external examiners to determine if they had received appropriate induction

[28] Those External Examiners who had raised concerns related to marking practices (reliance on external markers, for example), quality of feedback noting inconsistencies, too many markers per module etc. A new marking framework is being introduced in 2022/23 that may resolve some of these concerns, but this will be kept under review

Percentage of external examiner reports which include a concern on academic standards[xi]	20% [29]	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC [xii]	83[30]	

Though the data above is not as assuring as in previous years, much of the RAG rating is due to (a) some reports are still outstanding, and (b) concerns have been raised about marking practices that have not been reported on previously.

Assurance can 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*.

Of those external examiners whose 2020/21 reports noted comments impacting academic standards, even though there are more reports noting concerns on academic standards than in previous years, no one required a separate letter to the external examiner from the Chair of Academic Standards Sub-Committee (ASSC). As with all reports that have raised a concern on academic standards, the Chair of ASSC reviews the comment and provides a response within the report that is then returned to the external examiner with the remaining comments from the programme team.[31]

General themes across 2020/21 external examiner reports were:
- Diversification of assessment types, so there is less reliance on examinations and essays.
- Concern of open-book, online assessments impacting academic standards (specific subject areas, not across all subjects).
- Marking practices: marking criteria and more consistent feedback required.
- Concern of some grade inflation being seen in some subject areas – should be monitored and kept under review.
- Need to enhance communication with External Examiners, particularly being timelier in correspondence.
- More resource required for professional services staff.
- Note of increased volume of mitigating circumstance requests and appeals (with some areas noting this was a trend being seen before the pandemic, but there has been a significant increase in 2020/21).

While reports were complimentary, there still remains concerns raised relating to award of high marks, with many External Examiners continuing to link the high marks to the type of online assessment introduced to mitigate against the pandemic, while also noting that grade inflation remains a concern for

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[29] Those External Examiners who had raised concerns related to marking practices (reliance on external markers, for example), quality of feedback noting inconsistencies, too many markers per module etc. A new marking framework is being introduced in 2022/23 that may resolve some of these concerns, but this will be kept under review. It should be noted however that not all reports that identified an academic standard concern were felt by the College as being a concern e.g., one report noted as a concern the EE only being able to attend online because of their location at the time of the meeting.

[30] Although lower than last year, this is partially due to the staff in ARQS who would normally monitor this, left the team at a key part of the year, and while we recruited to the posts, there was some aspects of the external examiner process that we could not cover. It should be noted though that this is still higher than previous years, where only 50% of reports reported this.

[31] As noted in overview reports submitted to Academic Board in November 2021 (AB-21-11-03-07.1b) and June 2022 (AB-22-04-20-08.2a)

the sector so this issue is not exclusive to King's and is felt will be alleviated to some degree when there is a return to in-person assessment methods.

From 2022/23 the College has introduced new External Examiners roles: a College Chief External Examiner role, who will attend Academic Standards Sub-Committee; and Faculty Chief External Examiners, who will sit on Faculty Assessment Boards. Both new roles are aimed to assist the College and Faculties in holding strategic discussions about assessment and our grade profile, particularly in comparison to sector results, with the Chief External Examiner also being a critical friend in reviewing our Degree Outcome Statement.

Condition B5: Sector-recognised standards
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 Handbook[32]. Additionally, External Examiners confirm in their annual reports that the programme under review adheres to these sector-recognised standards.

On reviewing and revising the College marking criteria consideration was had on the QAA level 6 qualification descriptors, to ensure that we align, if not exceed, the expectations of the descriptors. External Examiner reports will provide assurance of programme teams adhering to these revised criteria.

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 College that the award being granted is of an appropriate standard.

Condition B6: Participation in the Teaching Excellence and Student Outcomes Framework (TEF)
King's submitted a TEF provider submission in 2016 and was awarded a Silver. All institutions were advised by the OfS on 10th June 2021[33] that all current awards were extended "until publication of the outcomes of the next TEF exercise".

During 2021/22 the OfS consulted on the future iteration of the Teaching Excellence Framework[34] (TEF). King's is now working on a new provider submission, due for submission mid-January 2023. To date, stakeholder meetings have been held, along with a review of the dataset that the TEF assessor panels will be considering alongside the provider submission and evidence. Updates on the TEF have been reported to College Education Committee and Academic Board.

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[32] https://www.kcl.ac.uk/governancezone/governancelegal/quality-assurance-handbook
[33] https://www.officeforstudents.org.uk/publications/letter-to-providers-tef-update/
[34] Revised named as outcome from consultation.

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

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

Condition C1: policies, procedures and terms and conditions have due regard to relevant guidance about how to comply with consumer protection law
The Students and Education Directorate is confident that King's remains compliant with consumer protection law, which applies to the relationship between King's College London and prospective and current undergraduate students. The university adopts a similarly consistent approach to postgraduate and online study.

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

The General Terms and Conditions are reviewed annually with the General Counsel. The revised Terms and Conditions were approved by Academic Board at its meeting in June 2022 (AB-22-06-29-06.3).

General information about the experience and status of staff is publicly available on the King's website. 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.

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.

Complaints: Complaints at King's are managed through the Student Conduct and Appeals Office. Any CMA-related complaints are brought to the attention of the CMA Working Group by the 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.

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

CMA Working Group
Following a reconfiguration of SED during 2021/22 the remit of CMA fell under the Associate Director (Academic Regulations, Quality and Standards). A review of the working group was undertaken and a proposal to enhance the remit of the working group and bring the group to a formal reporting line to the Programme Development and Approval Sub-Committee (PDASC) was approved in June 2022 (PDASC: 2021-22:66). The working group in 2022/23 will now become the Student Consumer and Protection Board and will formalize reporting to PDASC during the academic year.

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

Complaints and Appeals 2020/21	RAG rating
Compliance with the OIA's good practice framework: handling student complaints and academic appeals	
Average time taken to turnaround complaints and appeals[xiii]	35
Number of complaints escalated to the OIA	36
Number of complaints escalated to OIA that were not justified (benchmarked against the sector)	37

The turnaround time for complaints and appeals is outside recommended deadlines for both academic appeals and complaints. The turnaround time for both has been impacted by an unprecedented number of cases.

Academic Appeals
The numbers of Stage 1 Appeals increased to 1676 cases compared to 992 last year. It is believed that the increase this year is likely due to covid related issues such as return to face-to-face examinations after 2 years of online examinations for some students and increased mental health issues following the pandemic. It is recommended that a review of the increase in the numbers of cases is conducted to explore how we can better support the student experience going forward.

These large numbers are impacting on Faculty professional services teams as well as Faculty Assessment Boards and Student Conduct & Appeals. Currently the process involves a number of resource intensive steps. It is recommended that the Stage 1 Appeals adopt a similar automated workflow system to the mitigating circumstances process as soon as possible to help alleviate some of the pressure and this is currently being explored under SCAMP (Specialist Case and Appointment Management Project). Short term improvements are also being introduced to improve efficiency in the process.

Complaints
The delays in turnaround times for complaints are likely to be due to the large numbers of industrial action complaints we have received (2214 compared with 757 in 2020) as well as the number of complex cases which require a lengthier investigation. The process for dealing with industrial action complaints was adapted to accommodate the large numbers which improved the rate at which outcomes were sent but turnaround time for them is still higher than for other types of complaints (86 days compared to 49 days). For Stage 3 Complaints the delays are again due to the complexity of the cases which has resulted in lengthier investigations.

Office of the Independent Adjudicator (OIA)
There has been a decrease in the number of cases sent to the OIA this year compared to last year (30 compared to 32) and it is now below the median for universities of a similar size.

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[35] Academic Appeals. Regulatory timeframe for Stage 1: 42 days, average case turnaround time for Stage 1 (1676 cases): 51 days. Regulatory turnaround time for Stage 2: 42 days, average case turnaround time for Stage 2 (45 cases): 84 days. Complaints. Regulatory timeframe for Stage 2: 35 days, average case turnaround time for Stage 2 (2381 cases - including 30 Covid related complaints, 2214 industrial action related complaints and 137 other complaints): 84 days. Regulatory timeframe for Stage 3: 28 days, average case turnaround time for Stage 3 (28 cases): 35 days
[36] 30 cases were reported to the OIA in 2021/22. This is below the median for the number of complaints expected for Kings by the OIA which was 33 last year.
[37] The benchmark for the sector is 14 and Kings is 12.

The number of complaints that were not justified was a smaller number than the median for the sector. However, we had no cases in which the OIA found complaints were justified.

Condition C3: have published a Student Protection Plan which has been approved by OfS
There are no updates to be reported on relating to the content of the Student Protection Plan.
In line with OfS requirements, the Student Protection Plan is available online at:
https://www.kcl.ac.uk/governancezone/students/student-protection-plan

Annex 4: Condition E update: Good governance

Throughout 2021/22 there have been no updates to provide in relation to E1, E2, E3 and E5 (see above table for further information).

In relation to E4, there were no reportable events reported to OfS during 2021/22.

Annex 5: Condition F update: Information for students

Condition F1: Transparency information

The deadline for publishing our transparency information is 25th October 2022. This 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.

King's published this information on 14th September 2022, 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

Throughout the year there are numerous occasions where the College 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, with the following some examples to support this claim:

- Audited annual financial statements submission vis OfS portal (deadline was 1/3/2022):

Process submitted 13 December 2021 16:16:36	
Completed	13 December 2021 16:20:07
Outcome	Success
Comments	The audited financial statements has been submitted successfully. The processed file 'AFR21_FinancialStatements_10003645_1_13DEC2021_1618.pdf' can be obtained from the successfully submitted files download.
Files	Statements.pdf

- Audited financial workbook submission via OfS portal (deadline was 01/02/2022):

Process submitted 26 January 2022 15:39:18	
Completed	26 January 2022 15:43:49
Outcome	Success
Comments	The workbook has been submitted successfully. The processed file 'AFR21_Workbook_10003645_1_26JAN2022_1540.xlsx' can be obtained from the successfully submitted files download.
Files	Workbook.xlsx

- Annual financial data commentary submission via OfS portal (deadline was 01/03/2022):

Process submitted 09 February 2022 16:50:05	
Completed	09 February 2022 16:52:51
Outcome	Success
Comments	The commentary has been submitted successfully. The processed file 'AFR21_Commentary_10003645_1_09FEB2022_1651.docx' can be obtained from the successfully submitted files download.
Files	Commentary.docx

- Management letter from the external auditors submission via OfS portal (deadline was 01/03/2022):

Process submitted 09 February 2022 16:57:08	
Completed	09 February 2022 16:59:32
Outcome	Success
Comments	The external auditor's management letter has been submitted successfully. The processed file 'AFR21_ExternalAuditorsLetter_10003645_1_09FEB2022_1658.pdf' can be obtained from the successfully submitted files download.
Files	ExternalLetter.pdf

- Return sign-off by Accountable Officer (the Principal) submission via OfS portal (deadline was 15/03/2022):

Process submitted 03 March 2022 16:34:38	
Completed	03 March 2022 16:36:59
Outcome	Success
Comments	The sign off form has been submitted successfully. The processed file 'AFR21_SignOff_10003645_1_03MAR2022_1636.xlsx' can be obtained from the successfully submitted files download.
Files	SignOff.xlsx

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

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

Annual registration fees

The annual registration fees for OfS, HESA (Designated Data Body) and the QAA (Designated Quality Body) were paid when requested: OfS was paid 18th July 2022 (the deadline was 1st August 2022); HESA was paid 4th February 2022 (for 2nd March 2022 deadline) and 17h July 2022 (for 31st August 2022 deadline); and QAA were paid 20th May (deadline was 30th June 2022).

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[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

HREiR Action plan template for institutions 2022-2025

Details

Institution name:	King's College London
Cohort number:	5
Date of submission:	29th July 2022
Institutional context:	King's has conducted an in-depth review of progress to date, through: • Analysis of the results of the 2021 King's Research Staff Survey (KReSS) and comparison with longitudinal data from the Careers in Research Online Survey (CROS), forerunner of the KReSS • Ongoing engagement and discussion with the RSRC regarding issues of particular concern • Faculty updates on progress and individual action plans via the CRSD OG • Updates from relevant Professional Services departments and other interested parties Analysis of progress on Athena SWAN and Race Equality Charter initiatives

The institutional audience* for this action plan includes (only include direct beneficiaries; complete or delete, as appropriate):

Audience (direct beneficiaries of the action plan)	Number of	Comments
Research staff	1,800	Of whom all are included in the Concordat at King's
Postgraduate researchers	0	
Research and teaching staff	1,800	Of whom a portion are included in the Concordat at King's
Teaching-only staff	600	Of whom a portion are included in the Concordat at King's
Technicians	400	Of whom all are included in the Concordat at King's
Clinicians		
Professional support staff		
Other (provide numbers and details):		

	Complete for submission						To be completed only when reporting on action plan		
	Obligation	Action	Carried over from previous action plan?	Deadline	Responsibility	The targeted impact of the action (success measure)	Comments (optional)	Progress update	The actual impact of the action (reporting against the success measure)	Outcome (ongoing/carried forward/no further action)
Environment and Culture										
Awareness and engagement										
The aims of these obligations are to work towards an open and inclusive research culture, and to ensure broad understanding and awareness of this amongst researchers.										
ECI1	Ensure all relevant staff are aware of the Concordat.	Events to showcase what is being delivered against the Concordat. Decision made annually about what events to hold. Minimum number of events 1 per year	Yes, ECI1.3	Decision made annually in September Event to be held during the subsequent academic year	Decision making CRSD, Event contributions from Faculties HR Research Management & Innovation Directorate Senior management	Research staff more aware of the support they receive from King's (relevant questions in King's Research Staff Survey (KReSS)). Those planning initiatives have greater opportunities for collaboration, sharing of best practice and innovation (faculties addressing Concordat Principles in their individual action plans)				
ECI2	Ensure institutional policies and practices relevant to researchers are inclusive, equitable and transparent, and are well-communicated to researchers and their managers.	1. Code of conduct to ensure behaviour is appropriate at events and courses to be used at all events by CRSD. Similar codes to be rolled out across the university, to be piloted in faculties by Natural, Mathematical & Engineering Sciences (NMES) and in role groups by the Technical Network. Depending on success of the two pilots, to then be rolled out to other faculties and departments	1. Yes, EC2.3	1. Inclusion by NMES and Technical Network from Jan 2023 Review Jan 2024 Offered across university from February 2024	1. CRSD	1. Inclusion of the code in event literature Adherence to the code Pilot complete				

		2. Flexible Working Group (FWG) to continue to provide input into university-wide discussions relating to flexible working, as they link to the Athena Swan Action Plan. FWG is planning to work with HR to provide Bite Size training sessions for people managers on flexible working. The incorporation of more positive case studies highlighting diverse practices on the SharePoint site	2.1 Yes, ECI2.4 2.2 No	2. First part is ongoing consultation; deadline for training sessions January 2023 for the first to be delivered	2. FWG, Natasha Awais-Dean for general progression of discussions and Jessie Hardcastle re. training liaising with HR Gifty De Souza.	2. improved experience for all staff and support for managers to enable flexible working practices.				
		3. NMES: We will be creating a dedicated SharePoint hub for research staff in our faculty. This will pull together all the information research staff will need during their time with us, including information about local support, PDRs, training and development opportunities and links to College wide information, guidance docs and policies.	3. No	3. July 2023	3. NMES	3. Improved experience for research staff, greater awareness of the guidance and support available to them across the College and Faculty				
		4. A&H: Also creating a dedicated SharePoint hub (see above) A&H: Developing bespoke training for Early Career Researcher (ECR) and Postgraduate Research (PGR) communities on Research Ethics requirements	4. No	4. July 2023	4. A&H	4. Improved experience for research staff, greater awareness of the guidance and support available to them across the College and Faculty				
ECI6	Regularly review and report on the quality of the research environment and culture, including seeking feedback from researchers, and using the outcomes to improve institutional practices.	1. Faculty of Dental, Oral & Craniofacial Sciences (FoDOCS) aims to regularly hold Research Staff events which inform staff about measures available to support them, institutional and external opportunities and training that can benefit them in their career progression. Reference to Equality, Diversity & Inclusion (EDI), Research	1. No	1. Annually (in June)	1. Dean of Research Chair of Research Staff committee	1. Positive feedback from attendees in 3 specific areas: i. useful and informative to participants ii. networking discussion of key topics related to career	1. A pilot away day was organised for 2022 – outcomes and feedback from this have formed the basis for the			

							proposed action			
		Culture, public engagement and diversification of skill sets will be emphasised.				progression and training This will be obtained by surveys following the event				
		2. Monitor key aspects of positive research culture in FoDOCS through bi-annual surveys Key elements to be monitored are: i. opportunity to undertake necessary training for career development possible ii. able to work flexibly within context of project iii. clear project and training objectives agreed through completion of the induction document and signed researcher – supervisor agreement iv. uptake of PDR	2. No	2. July 2023	2. Dean of Research Chair Research Staff Committee	2. Obtain responses from >40% research staff and score against criteria for key elements of research culture				
		3. Run the King's Research Staff Survey (KReSS) on alternate years, 2023, 2025 etc.	3. Yes ECI6.1	3. Alternate years in May	3. CRSD	3. Obtain responses from >20% of research staff. Report available within 3 months				
ECR1	Encourage researchers to actively contribute to the development and maintenance of a supportive, fair and inclusive research culture and be a supportive colleague, particularly to newer researchers and students.	1. IoPPN School of Neuroscience Catalyst Project that includes various workstreams that support everyone's involvement in the delivering of activities and initiatives such as introduction of mentoring information session encouraging all staff and students to see a mentor officially and informally embedded within induction.	1. No	1. Ongoing Mentoring workstream project by Dec '22	1. IoPPN School of Neuroscience	1. Improvement engagement in activities that support inclusive research environments Provide opportunities to develop leadership skills				
		2. A&H- Developing and	2. No	2. July	2. A&H	2. Researchers to				

		embedding formal Faculty-wide mentoring scheme for incoming ECRs		2023		be recognised for their contributions to a positive research environment				

Wellbeing and mental health										
The aims of these obligations are to champion positive wellbeing amongst researchers, both through appropriate training and enabling new ways of working.										
ECI3	Promote good mental health and wellbeing through the effective management of workloads and people.	Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care (NMPC) through Research Executive to review training and support to managers. Faculty EDI Action Plan specific implementation section on Workload, flexible working and long working hours. Specific Strategic group on Workload and Long Work Hours.	No	Training reviewed by October/ November 2022 Implementation thereafter at regular intervals thought the year as appropriate	NMPC Research Executive	Managers support staff to work within workload limits acceptable for wellbeing and mental health, as measured by KReSS				
ECI4	Ensure managers of researchers are effectively trained in relation to wellbeing and mental health.	Mental Health First Aid (MHFA) Training provided by several groups across the university according to budget	Yes, ECM1.2							
		MHFA included in future professional development programmes as a collaboration between the Technical Leads and CRSD		Annually every September	Technical network leadership CRSD	Staff feel better equipped at supporting mental health and wellbeing, ascertained by feedback from training				
		NMES: Faculty arranging MHFA training for staff (research staff, managers of research staff and PGRs)		Ongoing	NMES	Managers of research staff, research staff and PGRs engaging with the training opportunities				
		FOLSM to work with Organisation Development		June 2023	FoLSM/ OD	Managers of staff feel better equipped				

		(OD) to implement MHFA training.			Development, Diversity & Inclusion	at supporting mental health and wellbeing, reported in staff responses to surveys in these areas.				
		FoLSM: Ensure all academics are aware of the EDI hub which includes details of training and awareness courses available online.		June 2023	FoLSM/ OD Development, Diversity & Inclusion	Managers of staff feel better equipped at supporting mental health and wellbeing. Staff responses to survey show better support in these areas.				
ECM3	Ensure managers promote a healthy working environment that supports researchers' wellbeing and mental health.	Institute of Psychiatry, Psychology & Neuroscience (IoPPN) School of Neuroscience to run an event based on mindfulness, wellbeing and time management	No	Dec '22	School of Neuroscience	Increase knowledge around health working environments Allow people to meet across campuses and job roles Remove some barriers to communicating better				
ECM4	Ensure managers consider fully flexible working requests and other appropriate arrangements to support researchers.	See ECI2.2								
ECR3	Ensure researchers take positive action towards maintaining their wellbeing and mental health.	Generally business as usual but see ECI4								
Bullying and harassment										
The aims of these obligations are to eliminate bullying and harassment in the research system, tackled through progressive policies and secure mechanisms to address incidents.										
ECI3	Promote a healthy working environment through effective policies and practice for tackling discrimination, bullying and harassment, including providing appropriate support for those reporting issues.	**1. Positive Workplace Initiatives** Cross-King's campaign to address bullying and harassment (B&H) and create a positive working environment for all staff, focused on four connected themes, with	1. Yes, ECI3.6	1. Ongoing iterative campaign of work with phased introduct	1. OD & HR Principal's Senior Team EDI colleagues Positive	1. Use of Report and Support Platforms Attendance at active bystander training – percentage coverage				

		example activities listed. **Leadership** ▪ Guidance and Scripts for Managers dealing with B&H ▪ Leadership Behaviours Toolkit ▪ Confidential Guided Conversations ▪ Leadership Coaching ▪ Bespoke Culture Reviews **Training & Awareness Raising** ▪ Active Bystander Training: webinars and online module ▪ Organisational Development Engagement Ethos ▪ King's Community Charter ▪ Considerate Communications Charter ▪ Allyship Toolkits ▪ Meetings Framework ▪ Bespoke team activities and events ▪ All Staff Meetings ▪ Staff Survey IoPPN B&H Toolkits **Reporting, Monitoring, Support** ▪ New HR Case Management Team ▪ Athena SWAN Action Plan ▪ Race Equality Charter Action Plan ▪ Culture Shift Report + Support platform for King's community ▪ Improved data to enable targeted interventions ▪ Quality and consistency of informal support mechanisms **Reward, Retention & Recognition** ▪ Exit Survey and Interviews ▪ Pay Equality ▪ Workload Management ▪ 360-Degree Feedback for Professorial Promotions ▪ Embedding Our Principles in Action into PDRs and People Processes ▪ Career Development		ion of initiatives Culture Shift Report + Support platform to be launched in September 2022 Active Bystander Training Phase II Launch October 2022 Embedding Our Principles in Action into PDRs: April 2023 Ongoing embedding of Our Principles in Action into People Processes: 2023 to 2025 Staff Survey: Spring 2023 Career Develop	Workplace Initiatives Senior Sponsorship Group Positive Workplace Initiatives Steering Group	Survey outcomes, including KReSS Completion of Performance Development Reviews (PDR) Increased number of communications around positive workplace initiatives Availability of data to monitor cases and outcomes				

		Frameworks ▪ King's Awards and local recognition of positive behaviours		ment Framew orks: 2025				
		2. IoPPN B&H Committee with responsibility to oversee B&H and lead on strategic change through Task and Finish Groups (TFGs). Two TFGs will be established to (1) explore introduction of Confidential Advisors (2) improve communication of initiatives, ongoing work and impact of B&H.	2. Yes, ECI3.6	2. Confide ntial Advisors TFG to feedbac k by Dec 2022 with Confide ntial Advisors in place by Spring '23 Commu nication TFG initial comms campaig n complet ed by Spring '23	2. IoPPN B&H Committee T&F members (appointment to be made by open EOI)	2. Increased number of people training in formal and informal processes Improved signposting Improved pastoral care for those experiencing inappropriate behaviour Improved knowledge of initiatives in place and planned Improved understanding and knowledge of the impact B&H can have Improved feedback loops through use of Vignettes highlighting consequences of poor behaviour		
		3. IoPPN Regular B&H Workshop and other opportunities to engage and ensure different perspectives are heard.	3. Yes, ECI3.6	3. At least annually	3. IoPPN B&H Committee TFG members (appointment to be made by open expression of interest)	3. Opportunity to share experiences, ideas and contribute to initiatives and activities to address B&H		
		4. A&H Project to clarify processes on B&H with staff via Depts and share widely on SharePoint site in development. Work with independent Research	4. No	4. July 2023	4. A&H	4. Improved knowledge of initiatives in place and planned Improved understanding and		

		Integrity Advisors to clarify function and increase visibility.				knowledge of the impact B&H can have				
ECM3	Ensure managers encourage reporting and addressing incidents of discrimination, bullying and harassment.	See ECI3								
ECR4	Ensure researchers use available mechanisms to report staff who fail to meet the expected standards of behaviour in relation to discrimination, harassment and bullying.	IoPPN B&H Anonymous Reporting Tool indicates researchers are using tool and reporting inappropriate behaviours which has been communicated across the faculty and college. This will be replaced by Report and Support. The action is to communicate the introduction of Report and Support and ensure appropriate links are embedded across the university.	No	Sep '22 with regular review of all materials	OD Principal's Senior Team Positive Workplace Steering Group Corporate Communications Faculty Communication Teams	Single point of contact Improved awareness of how to report inappropriate behaviour				
Equality, diversity and inclusion										
The aims of these obligations are to ensure managers and researchers are trained in-, aware of- and adopt practices enhancing equality, diversity and inclusion.										
ECI4 / ECM1	Ensure managers undertake relevant training and development opportunities related to equality, diversity and inclusion, and put this into practice in their work.	1. Included in other action plans so will not be addressed here King's holds an Institutional Silver Award and Bronze Race Equality Charter Mark https://www.kcl.ac.uk/hr/diversity/docs/pdf/finalised-athena-swan-action-plan-nov-2020-4-1.pdf And https://www.kcl.ac.uk/hr/diversity/gender-and-race-equality/kings-race-equality-action-plan-2020-2024.pdf	1. Yes, EC2.1 and ECI2.2	1. See action plans in the provided links	1. See action plans in the provided links	1. See action plans in the provided links				
		2. IoPPN Research Innovation Committee leading Research training programme for those from racialised or minoritised backgrounds which will be available across university	2. No	2. Initial consultation on training to start Autumn	2. IoPPN Research Innovation Committee IoPPN Culture,	2. Increased access to training for those from racialised or minoritized backgrounds				

				'22 with training rolled out 23-24 academic year	Diversity & Inclusion Team	Integration of learnings from course embedded across other training programmes				
ECR2	Ensure researchers act in accordance with employer and funder policies related to equality, diversity and inclusion.	1. Included in other action plans so will not be addressed here King's holds an Institutional Silver Award and Bronze Race Equality Charter Mark https://www.kcl.ac.uk/hr/diversity/docs/pdf/finalised-athena-swan-action-plan-nov-2020-4-1.pdf And https://www.kcl.ac.uk/hr/diversity/gender-and-race-equality/kings-race-equality-action-plan-2020-2024.pdf	1. Yes, EC2.1	1. See action plans in the provided links	1. See action plans in the provided links	1. See action plans in the provided links				
		2. IoPPN/ South London and Maudsley NHS Foundation Trust joint lead – Building Racial Equity, and Diversity in Research Network – cross org./KHP initiative to better support racial equity within research	2. No	2. Ongoing	2. Dr Juliana Onwumere (current chair) IoPPN/ South London and Maudsley NHS Foundation Trust Research & Development Office	2. Improved embeddedness, connection and integration of race equality work in research across NHS Trusts, King's and community organisations				
Research Integrity										
The aims of these obligations are to ensure managers and researchers are trained in-, aware of- and maintain high standards of research integrity, and are able to report infringements or misconduct.										
ECI5 / ECM2	Ensure researchers and their managers are aware of, and act in accordance with, the highest standards of research integrity and professional conduct.	1. Continuation of training on research integrity, research governance, and research ethics through our introductory sessions and more focused, local sessions (the integrity ones developed in partnership with the Research Integrity Advisor (RIAd) network).	1. Yes, ECI5.4	Ongoing	Research Integrity Office (RIO) in partnership with RIAds	Increased numbers of training attendees and positive feedback				
		2. Mapping exercise to identify	2. No	Jan	RIO	Training gaps				

		gaps in areas who have not received training.		2023		identified and contact made with areas to arrange training				
		3. Creation of online training module.	3. Yes, ECI5.4	Sept 2023	RIO	Online module created				
		4. Creation of a University-wide Code of Conduct in Research, supported by faculty-specific guidance.	4. Yes, ECI5.1	Jan 2023	RIO	Code developed and published through KCL approval channels				
		5. Research Integrity training in A&H will continue in 2022-23 tailored for specific departments and we will survey on what is meaningful to colleagues and how often reviews need to be conducted. A conference on Research Integrity to take place in 2022-2023.	5. No	5. Training delivered throughout the year Survey annually	5. A&H	5. Uncovering the meaning of research integrity to researchers Input on frequency of reviews				
ECM3	Ensure managers report and address incidents of poor research integrity.	Increased visibility of the RIAd network and of the Research Integrity Office.	Yes, ECI5.2	Ongoing	RIO with support from Faculty-based RIAds	Increased volumes of enquiries being received by RIO and/or RIAds.				
ECR2	Ensure researchers act in accordance with employer and funder policies related to research integrity.	Awareness raising through training and RIAd network	Yes, ECI5.4	Ongoing	RIO plus other teams in Research Management & Innovation Directorate, e.g. Research Grants & Contracts, Centre for Doctoral Studies, CRSD.	More enquiries on good research practices; more requests for local training.				
ECR4	Ensure researchers use available mechanisms to report staff who fail to meet the expected standards of behaviour in relation to research misconduct.	Increase visibility of reporting mechanisms of potential research misconduct or other breaches of good practice through training and RIAd network	Yes, ECI5.4	Ongoing	RIO with support from Faculty-based RIAds	Increased reporting.				
Policy development										
The aims of these obligations are to encourage all researchers to actively contribute to the development of policies driving positive change at their institution.										

EI7	Consider researchers and their managers as key stakeholders within the institution and provide them with formal opportunities to engage with relevant organisational policy and decision-making.	See ECI3, ECM3 and ECR4 above								
ECM5	Encourage managers to engage with opportunities to contribute to policy development aimed at creating a more positive research environment and culture within their institution.	See ECI3, ECM3 and ECR4 above								
EM5	Engage with opportunities to contribute to relevant policy development within their institution.	See ECI3, ECM3 and ECR4 above								
ECR5	Encourage researchers to consider opportunities to contribute to policy development aimed at creating a more positive research environment and culture within their institution.	See ECI3, ECM3 and ECR4 above								
ER4	Recognise and act on their role as key stakeholders within their institution and the wider academic community.	See ECI3, ECM3 and ECR4 above								
Employment										
Recruitment and induction										
The aims of these obligations are to ensure recruitment of researchers is open and fair and researchers receive effective inductions into the organisation.										
EI1	Ensure open, transparent and merit-based recruitment, which attracts excellent researchers, using fair and inclusive selection and appointment practices.	Included in other action plans so will not be addressed here King's holds an Institutional Silver Award and Bronze Race Equality Charter Mark https://www.kcl.ac.uk/hr/diversity/docs/pdf/finalised-athena-swan-action-plan-nov-2020-4-1.pdf And https://www.kcl.ac.uk/hr/diversity/gender-and-race-	Yes, ECI2.1	See action plans in the provided links	See action plans in the provided links	See action plans in the provided links				

		equality/kings-race-equality-action-plan-2020-2024.pdf								
EI2	Provide an effective induction, ensuring that researchers are integrated into the community and are aware of policies and practices relevant to their position.	1. NMES: We will ensure that a link to the research staff SharePoint hub (referred to under ECI2) is included in induction materials across our faculty	1. No	1. End 2023	1. NMES	1. Awareness for new starters of the guidance and support available to them during their time at King's as measured by a survey of new starters				
		2. Faculty of Social Science & Public Policy (SSPP): All research staff are offered the opportunity to participate in Department Induction and the annual Faculty Research Café which covers all the support available for researchers	2. No	2. By 31 March annually Department induction when starting and a Faculty Research Induction (research Cafe) in February each year	2. SSPP Heads of Department; Vice Dean (research) and Faculty Research Manager	2. Awareness for new starters of the guidance and support available to them during their time at King's as measured by fewer basic questions and less confusion about where to go for information and advice; clarity about who does what.				
		3. A&H. A dedicated page with relevant info will be set up on SharePoint Research Hub in development. A&H ECR Peer Network established and supported- starting with Induction event for new starters Oct 22 A&H Developing and embedding formal Faculty-wide mentoring scheme for incoming ECRs	3. No	3. July 2023 July 2023 July 2023	3. A&H	3. Improved experience for research staff, greater awareness of the guidance and support available to them across the College and Faculty				
		4. NMPC Annual review with	4. Yes	4.	4. NMPC	4. Induction				

		research staff involvement of induction programme currently offered termly to all new staff. Introduction to Research staff "buddy" for all new starters.		Annually in July and termly in first week		programme appropriate for target audience. Buddying connects researchers to university and provides a sense of belonging				

Recognition, reward and promotion

The aims of these obligations are to ensure the fair and inclusive recognition of researchers as part of their career progression.

EI3	Provide clear and transparent merit-based recognition, reward and promotion pathways that recognise the full range of researchers' contributions and the diversity of personal circumstances.	1. SSPP: Raised researcher promotion at College level; looking to include them in the academic performance framework 2. Review current processes for rewarding research staff who support PGR students and how they can be recognised for their contribution. Recognition options to be considered are broad, and depending on the outcome of the review, may need a variety of mechanisms to implement	1. No 2. No	1. Academic Year 2022/3 latest 2. Review to conclude August 2023. Implementation dependent on type of recognition agreed, completion by 2025	1. SSPP line managers of research staff/Academic Senior Leadership Team 2. CRSD Centre for Doctoral Studies Dean for Doctoral Studies	1. Research staff being included in the academic promotion process 2. Increased satisfaction for research staff measured in the KReSS PGR student benefit from supervision by recognised staff				
EM3	Managers commit to, and evidence, the inclusive, equitable and transparent recruitment, promotion and reward of researchers.	SSPP: to generate particular communications and message reinforcement of action in EI3 if consistent approach to promoting research staff is achieved	No	July 2023	Vice Dean People and Planning	SSPP Researchers achieve promotion through a fair and transparent process assessed in the KreSS and within faculty				

Responsibilities and reporting

The aims of these obligations are to ensure that researchers and their managers understand and act on their obligations and responsibilities.

EM2	Managers familiarise themselves, and work in accordance with, relevant employment legislation and codes of practice, institutional policies, and the terms and conditions of grant funding.	See PCDM5							
ER1	Researchers ensure that they work in accordance with, institutional policies, procedures and employment legislation, as well as the requirements of their funder.								
ER2	Researchers understand their reporting obligations and responsibilities.	See ECR4 and ECI3							
People management									
The aims of these obligations are to ensure that researchers are well-managed and have effective and timely performance reviews.									
EI4	Provide effective line and project management training opportunities for managers of researchers, heads of department and equivalent.	1. IoPPN new Head of Department process includes provision for additional leadership training 2. FoDOCS will signpost all managers of research staff to Vitae toolkits and training opportunities at King's	1. No 2. No	1. On appointment of each new Head of Departmment from Jun '22 2. Quarterly notifications to manager of research staff	1. IoPPN Executive Dean Relevant Head of School 2. FoDOCS Research Support team Dean of Research	1. Ensure those take on senior leadership roles are equipped and supported for responsibilities 2. Uptake of training by managers Responses from research staff to bi-annual survey (see above)				
EI5	Ensure that excellent people management is championed throughout the organisation and embedded in institutional culture, through annual appraisals, transparent promotion criteria, and workload allocation.								

EM1	Managers undertake relevant training and development opportunities so that they can manage researchers effectively and fulfil their duty of care.	IoPPN to improve monitoring of attendance at training and development and how this is fed back to departments who are then able to take appropriate action when gaps materialise	No	Improvements in place by Sep '23	IoPPN Culture, Diversity & Inclusion Team	Ability to identify gaps in training attendance Ensure equitable access to training and development				
EM4	Managers actively engage in regular constructive performance management with their researchers.	NMES: The Faculty have developed a PDR SharePoint app which was trialled with professional services staff during the 2021 PDR round. It will be rolled out to all research and academic staff for the 2022 PDR round. The app will provide robust tracking of PDR completion rates and help us ensure productive PDR conversations are happening with all our research staff. This falls under "People and Community", "Research Excellence" and "Staff Development" priorities of the NMES 5-year plan	Yes, EM4, EM5, PCDM1.1, PCDR4.1 and EI5.1	Initial roll-out June 2022, then annually	NMES	More research staff engaging in productive PDRs, improved ability to track PDR completion rates				
		NMPC: Since April 2022 Research Support Office has run PDR refresher training and is coordinating probation appraisal for new starters and for all research staff. The faculty will continue to run these indefinitely	Yes, EI5.1	Annually in April	NMPC	2. Research staff feel welcomed and supported in their PDR, monitored by the KReSS and faculty surveys				
ER3	Researchers positively engage with performance management discussions and reviews with their managers.									
Job security										
The aim of this obligation is to improve the job security of researchers.										
EI6	Seek to improve job security for researchers, for example through more effective redeployment processes and greater use of open-ended contracts, and report on progress.	King's is undergoing a major review of the use of Fixed-Term Contracts with the intention of employing a significant portion of research staff on open contracts in future. i. initial scoping exercise, examining options, changes	Yes, EI3.1	i. September 2022 ii. dependent on findings from i. most	Principal's Senior Team HR Research Management & Innovation Directorate (various departments	Impact: 1. Remove insecurity arising from inability to obtain mortgages, loans and housing rental agreements 2. Minimal impact on those managing the process	While not affecting job security per se, this initiative is expected to improve the lived experience			

		required, workload models, funding models, necessary automation ii. decision making process for investment levels, who to include, possible pilot requirement, staffing requirements iii. implementation. The specifics of this will depend on i. and ii. and are likely to include significant investment in creating new reporting and process structures, collaboration between many departments, an overhaul of the redeployment policy, creation of a redeployment system and other actions that are as yet unknown but are expected to arise. This project constitutes a major undertaking with a large number of departments and staff involved		likely December 2022 iii. starting following completion of ii. with expected duration of 2 years minimum, depending on findings in i.	including CRSD) Faculties	Project outcomes measured by i. completion of scoping exercise ii. completion of decision making phase iii. dependent on implementation requirements including new systems being in place and staff engaging positively with new processes	of research staff. It is connected to PCDM5 and PCDI5.			
Professional and Career Development										
Championing professional development										
The aims of these obligations are to promote the importance of professional development and ensure researchers have the time to engage in it.										
PCDI1	Provide opportunities, structured support, encouragement and time for researchers to engage in a minimum of 10 days professional development pro rata per year, recognising that researchers will pursue careers across a wide range of employment sectors.	1. Active encouragement and support from technical network and senior leadership for technical staff to take up the 10 day professional development offer 2. NMPC – all researchers eligible for resources to fund Continuing Professional Development activities from their Research Divisions and are regularly making requests	1. No 2. No	1. At all technical staff monthly gatherings 2. Ongoing, open submission	1. Technical leadership and core group 2. NMPC	1. Numbers of technical staff engaging with professional development increase, monitored by KReSS and other relevant surveys 2. Number of applicants per year				
PCDI6	Monitor, and report on, the engagement of researchers and their managers with professional development						Now considered business as usual			

	activities.									
PCDM3	Managers allocate a minimum of 10 days pro rata per year, for their researchers to engage with professional development, supporting researchers to balance the delivery of their research and their own professional development.	Encouragement to take up the 10 days included in the King's current externally published Technician Commitment Initiative action plan and will be a major part of our 2023 submission	No	June 2023	Senior leadership. Technical Network leadership	Inclusion in submission Uptake of 10 days as monitored in the KReSS				
PCDR1	Researchers take ownership of their career, identifying opportunities to work towards career goals, including engaging in a minimum of 10 days professional development pro rata per year.									
Career development reviews										
The aims of these obligations are to ensure researchers and their managers are engaging in productive career development reviews.										
PCDI2	Provide training, structured support, and time for managers to engage in meaningful career development reviews with their researchers.						This is now business as usual with the majority of research staff having PDRs.			
PCDI6	Monitor, and report on, the engagement of researchers and their managers with researcher career development reviews.						This is now business as usual with the majority of research staff having PDRs.			
PCDM1	Managers engage in regular career development discussions with their researchers, including holding a career development review at least annually.						This is now business as usual with the majority of research staff having PDRs.			

PCDR4	Researchers positively engage in career development reviews with their managers.							This is now business as usual with the majority of research staff having PDRs.		

Career development support and planning

The aims of these obligations are to promote researchers' career development planning through tailored support and gathering evidence of professional experience.

PCDI3	Ensure that researchers have access to professional advice on career management, across a breadth of careers.	1. Focus on increasing proportion of research staff using careers services for appointments and events	1. No	1. July 2023 and beyond	1. King's Careers & Employability (KCE)	1. Proportion of staff using KCE increases	King's has a dedicated careers team that has successfully provided ongoing support for more than 15 years in this area and is now business as usual. Only new projects will be included here			
		2. Advancing in Academia: blended approach for different disciplines looking at how to develop an academic career. New for 2022 – blended approach for NMES and creating an asynchronous version for any discipline.	2. No	2. June 2023	2. KCE	2. Course runs with at least 10 staff participants				
		3. What's up doc – piloted 21-22. Developing blended learning approach for research staff considering the option of starting a PhD. Intention to collaborate with other universities beyond the Russell Group.	3. No	3. Spring 2023	3. CRSD and KCE	3. Course runs with 20 staff participants				
		4. Placement Project – investigating how short placements based on information interviewing can be supported with resources for research staff.	4. No	4. Summer 2023	4. KCE and CRSD	4. Research staff feel supported in exploring career options, monitored though KReSS				
PCDR3	Researchers maintain an up-to-date professional career development plan and build a portfolio of evidence demonstrating their experience, that can be used to support job applications.	Professional registration with the Science Council and professional bodies (Royal Society of Biology / Chemistry for example) Funded for Technical staff available to all researchers with Technical network mentoring support	No	On going	Technical leadership and staff	Numbers of registrations per year				

Research identity and leadership

		The aims of these obligations are to provide researchers with opportunity to progress in their careers by developing their research identity and leadership capabilities.								
PCDI4	Provide researchers with opportunities, and time, to develop their research identity and broader leadership skills.	FoLSM – with the Research Staff Network working on a proposal to ensure recognition of individuals contributing to wider agendas, including committees, leading on projects etc.	No	Dec 2022, recognition process thereafter	Faculties/FoLSM	Tangible recognition will encourage more researchers to get involved.				
PCDM4	Managers identify opportunities, and allow time (in addition to the 10 days professional development allowance), for their researchers to develop their research identity and broader leadership skills, and provide appropriate credit and recognition for their endeavours.	1. Technical network to create a list of short-term secondments cross all the faculties and Core Facilities	1. No	1. Late summer 2022 with deployment thereafter	1. Technical leadership and core group and Technical Services Operating Model Design Programme Manager	1. Technical staff gain a taste of another campus, different skill sets and insight into protocols and local health and safety and statuary compliance monitored by creation and uptake of secondments				
		2. Toolkits to enable managers to support ECRs (developed following funding awarded to KCL managers in partnership with Vitae) are integrated within manager-ECR development planning, and monitored within manager PDR	2. No	2. Summer 2023	2. Faculties	2. ECRs report increased opportunities for development, and satisfaction with management interactions assessed in KReSS				
PCDM5	Managers engage in leadership and management training to enhance their personal effectiveness, and to promote a positive attitude to professional development.	Development of a new programme co-created with and to address the approach of managers to supporting their research staff. This co-creation process took place over 2 months and involved consultation with existing and senior managers of research staff in every faculty within King's. Following this process, a new piece of development activity is being trialled 3 times in 2022-23 and will be open to academic colleagues across the faculties. Following completion of this delivery we will review the programme outcomes. Depending on the level of success the	No	July 2023 and annually thereafter in July	CRSD	In the trial period the broad aims of the programme are to raise awareness of this avenue of professional development for managers, monitored by attendance and representation of a range of faculties. Workshop feedback forms will be used to measure reaction and inform iterative improvements to the programme and related support and resources. Later				

		programme will either be revised by modification to the content, creation of other resources or other means, in collaboration with the target audience, or retained as is and incorporated into our standard offering. To some level a level of iteration is expected. This project will rely on cooperation across the faculties to successfully promote the trial and potentially embed the offering within our wider programme. This programme is funded by HEIF in the trial period and therefore exists in the context of a raft of projects initiated by the CRSD to address career precarity. It will also connect to the Managers Toolkit devised by King's Future Leaders Fellows in collaboration with Vitae.				stages of the Kirkpatrick model will be addressed by surveys on repeated occasions to understand learning and how this has been applied. Changes to the management environment experienced by research staff will be monitored by the KReSS				
Diverse careers										
The aims of these obligations are to recognise, value and prepare researchers for the wide range of career options available to them within and beyond research.										
PCDI5	Recognise that moving between, and working across, employment sectors can bring benefits to research and researchers, and support opportunities for researchers to experience this.	Career Tracks project – initial literature review and case study collection of researchers working beyond academia. Resource to be used in PCDM5. Following year to be turned into asynchronous resource.	No	July 2023	CRSD with KCE	Improved visibility of careers beyond academia. Measured by use of resource, uptake of careers consultant appointments and anecdotal feedback.	King's has a dedicated careers team that has successfully provided ongoing support for more than 15 years in this area and is now business as usual. Only new projects will be included here			

PCDM2	Managers support researchers in exploring and preparing for a diversity of careers, for example, through the use of mentors and careers professionals, training, and secondments.	1. Hub to be developed for research staff managers supporting them in having career conversations with research staff and how to refer them to other services such as KCE. Initial scoping exercise to be completed followed by content creation and hub developed in two stages. Hub to incorporate and complement Managers' Toolkit (see PCDM4)	1. No	1. Scoping to July 2023 Phase 1 to July 2024 Phase 2 to July 2025	1. CRSD + KCE	1. Managers have better understanding of how to hold a career conversation with their staff and how to refer them. Monitored by KReSS and manager survey				
		2. NMES: A statement will be drafted by the faculty to the effect that we support our research staff and PhD students in their career choice, whatever that may be. Departments will be asked to upload this to their websites	2. Yes, PCDM2.2	2. October 2022	2. NMES	2. Statement is clearly visible on all our department webpages and message is received by research staff				
		3. All managers or departments where not possible for managers to provide a statement on their webpage or other location to the effect that they support their research staff and PhD students in their career choice, whatever that may be.	3. Yes, PCDM2.2	3. Initial campaign during 2023, posting thereafter	3. CRSD	3. Percentage of managers with this information posted, target minimum in first round 5%				
PCDR2	Researchers explore and prepare for a range of employment options across different sectors, such as by making use of mentors, careers professionals, training and secondments.									
PCDR6	Researchers consider opportunities to develop their awareness and experience of the wider research system through, for example, knowledge exchange, policy development, public engagement and commercialisation.	Engage with the Science Museum and the Gatsby funded Technicians Gallery in promoting Technical careers as an excellent career pathway. To engage with School children, teachers, and the general public, in the vital role technical staff play in Research and education	No	Sept 2022 then active for 5 years	Technical network leadership core group	Technical staff gain greater confidence in and wider appreciation of the scope of their role, monitored by numbers taking up the opportunity				

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* The Researcher Development Concordat defines researchers as individuals whose primary responsibility is to conduct research and who are employed specifically for this purpose by a higher education institution or research institute. The primary audience is research staff, e.g. postdoctoral researchers, research fellows, research assistants. The Researcher Development Concordat encourages institutions to include other groups who actively engage in research as beneficiaries of their Concordat action plan. These could be postgraduate researchers; staff on teaching and research, or teaching contracts; clinicians; professional support staff; technicians.

Further hyperlinks and supplementary information (more rows can be added)	

Abbreviations and glossary (more rows can be added)	
A&H	Arts & Humanities
B&H	Bullying and Harassment
CRSD	Centre for Research Staff Development
ECR	Early Career Researcher
EDI	Equality Diversity & Inclusion
FoDOCS	Faculty of Dentistry, Oral & Craniofacial Surgery
FWG	Flexible Working Group
FoLSM	Faculty of Life Sciences & Medicine
HR	Human Resources
IoPPN	Institute of Psychiatry, Psychology & Neuroscience
KCE	King's Careers & Employability
KCL	King's College London
KReSS	King's Research Staff Survey
MHFA	Mental Health First Aid
NMES	Natural, Mathematical & Engineering Sciences
NMPC	Florence Nightingale Faculty of Nursing, Midwifery & Palliative Care
OD	Organisation Development (team within HR)
PDR	Performance and Development Review (KCL's appraisal system)
PGR	Postgraduate Research
PI	Principal Investigator
RIAd	Research Integrity Adviser
RIO	Research Integrity Office
RMID	Research Management & Innovation Directorate
SSPP	Faculty of Social Science & Public Policy

[Type here]

			TFG	Task & Finish Group

Council	
Meeting date	22 November 2022
Paper reference	KCC-22-11-22-9.6
Status	Final

Report of the Chairs' Committee

Contents	Meeting at which considered	Consent agenda	Council action
1. Dormant Subsidiary Change of Use	5 September 2022 (email)	Yes	Note
2. Chairs' Committee Updates	10 November 2022	Yes	Note

To Note

1. Dormant Subsidiary Change of Use

Through an email approval, the Chairs' Committee agreed repurposing a currently dormant subsidiary to use as a company to execute plans for online education once those are decided. The matter was discussed with the Honorary Treasurer and Lord Geidt agreed that the proposal would go to the Chairs' Committee in the interests of time. The three company directors are the Vice-Principal (Education & Student Success), the Senior Vice-President(Operations) and the Vice-President (Finance). It is stressed that this is a facilitative action only and has no implications for the substantive decisions to be made in future with respect to King's Global or other proposals concerning online education.

2. Shared Committee Updates

The Committee met in regular session on 10 November 2022 to update each other on issues under discussion in their various standing committees and to receive updates from the Principal on matters he would be raising in his report to the November meeting of Council.

Irene Birrell
November 2022

Council	
Meeting date	22 November 2022
Paper reference	KCC-22-11-22-9.7
Status	Final - **RESERVED**

Report of the Remuneration Committee

Contents	Meeting at which considered	Consent agenda	Council action
1. Senior Team Performance Assessments	5 October 2022	No	Note
2. Annual Remuneration Report	5 October 2022	No	Note
3. Senior Executive Expenses Assurance Report	5 October 2022	No	Note

To Note

1. **Senior Team Performance Assessments**
    The Committee received a report from the Principal summarising his reviews of performance of members of the senior team and the agreed objectives and priorities for 2022-23. Those priorities were guided by commitments in Strategy 2025 and included a benchmarking report on progress against objectives that would be updated on at least a yearly basis. The focus would on delivery of the Council-approved annual plan with the main concerns being student numbers, research targets, and the overall margin position. The Chair of the Committee and the President & Principal will speak in more detail to the objectives at the meeting.

2. **Annual Remuneration Report and Salary Information**
    The Committee received summary reports from the Director of Human Resources with respect to:
    - remuneration for members of the senior executive team for 2021-22
    - an update on national pay bargaining outcomes for 2022, the outcome of which was a three percent uplift on all pay points with higher uplifts for those on lower spine points of up to nine percent
    - various other pay increases implemented across the year that had resulted in salary increases ranging from 15.6% for the staff in the lower grades to 8.3 percent for staff in Grade 8 posts
    - the positive impact of the Professorial Pay Framework (introduced in 2018) on closing the median gender pay gap
    - the work in progress to establish a similar framework for Senior Professional Staff
    - various increases to pay across the board for the year

3. **Senior Executive Expenses Assurance**
    In accordance with the Policy on Remuneration for Senior Post Holders, the Committee received assurance from the Vice-President (Finance) that policies and procedures with respect to senior executive expenses had been followed over the past year.

Lan Tu
November 2022