King's College Council	
Meeting date	21 November 2023
Paper reference	KCC-22-11-21-03
Status	Final
Access	Members and senior executives

Meeting of the King's College Council to be held on **21 November 2023 at 17:00 in the Council Room, King's Building.**

Agenda

1	**Welcome, apologies and notices**		Chair
2	**Declarations of interests** (to note)	KCC-23-11-21-02	Chair
3	**Approval of agenda**	KCC-23-11-21-03	Chair
4	**Unanimous Consent Agenda**, including:	KCC-23-11-21-04	Chair
	4.1 Minutes of the Previous Meeting	KCC-23-11-21-04.1	
	4.2 Council Rolling Calendar of Business	KCC-23-11-21-04.2	
	4.3 Actions Log	KCC-23-11-21-04.3	
5	**Matters Arising**	Verbal	Chair
6	**Report of the Chair**	Verbal	Chair
7	**Report of the Vice-Chancellor & President**		
	7.1 Summary Report on Key Issues (to note)	KCC-23-11-21-07.1	Vice-Chancellor
8	**Report of the KCLSU** (to note)	KCC-23-11-21-08	KCLSU President
9	**Reports of Committees**		

9.1 Report of the Finance Committee [RESERVED]		KCC-23-11-21-09.1	Chair FC
(i)	Financial Statements 2022-23 and Auditor's Management Letter (to approve)	Annex 1	
(ii)	Five Year financial Forecast to Office for Students for review and approval	Annex 2	
(iii)	King's Interdisciplinary Science (Phase 1) – Full Business Case (to approve)	Annex 3	
(iv)	Student Success Transformation Programme – revised Business Case (to note)	Annex 4	
(v)	Investment Subcommittee Annual Report	Annex 5	
(vi)	Management Accounts Month 2, 2023-24		

See the Consent Agenda for remaining items

9.2 Report of Audit, Risk & Compliance Committee		KCC-23-11-21-09.2	Chair ARCC
(i)	External Audit Report & Letter of Management Representation (to approve)	Annex 1 & 2	
(ii)	Development of the Board Assurance Framework (to approve)	Annex 6	

(iii) Annual Report of the Audit, Risk & Compliance Committee (to note)	Annex 7		
(iv) Risks to the Student Success Transformation Project	Annex 8		

See the Consent Agenda for remaining items

9.3 Report of the Estates Strategy Committee [RESERVED]	KCC-23-11-21-9.3	Chair ESC	

See the Consent Agenda for all items (all to note)

9.4 Report of the Staff & Culture Strategy Committee [to note]	KCC-23-11-21-9.4	Chair SCSC	

See the Consent Agenda for all items

9.5 Report of Academic Board — KCC-23-11-21-9.5 — Chair AB

(i) GKT School of Medical Education Branch Campus — Annex 1

(ii) Ongoing Conditions of Registration for Office for Students 2023-2024 (to approve) — Annex 2

(iii) 2022-2025 Action Plan Against the Concordat to Support Development for Researchers – Progress - Report for UUK (to approve) — Annex 3

See the Consent Agenda for remaining items (all to note)

9.6 Report of the Governance & Nominations Committee [RESERVED] — KCC-23-11-21-9.6 — Chair of Council

See the Consent Agenda

9.7 Report of the Remuneration Committee [RESERVED] — KCC-23-11-21-9.7 — Chair RemCom

(i) Management Priorities, Deliverables and Measures for 2023-24

(ii) Annual Report of the Remuneration Committee

(iii) Vice-Chancellor & President – Annual Performance Assessment

10 Any other business	Verbal	Chair	
11 Meeting Adjourned	Verbal	Chair	

Lord Geidt
November 2023

King's College Council	
Meeting date	21 November 2023
Paper reference	KCC-23-11-21-02
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) (ended 26 January 2023
- The Nuffield Trust for the Forces of the Crown (Trustee)
- The Rectory Society (Trustee)
- House of Lords (Crossbench Member)
- Adviser, Lumina Sustainable Materials AS (materials science)

Alizeh Abrar
- Vice-President (Post-Graduate), KCLSU

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) King's
- Trustee, Society of Jewellery Historians
- Team Manager, Berkhamsted Swim Club (voluntary)
- Member of the Society of Jewellery Historians
- Member of the Society of Renaissance Studies

Tom Berry
- Trustee, Employers' Network for Equality and Inclusion (enei)
- Owner, Be Less Beige Ltd
- NED Mental Health First Aid England CIT
- NED Aequitas Global Ltd
- NED HMDG Ltd
- Trustee EOT, With Public Relations Ltd
- Owner, One Question Ltd

Hillary Briffa
- Lecturer in National Security Studies in the Department of War Studies
- Circle U Chair – Climate Hub
- Programme Director, MA in National Security Studies
- 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)
- Member, Finance & General Purposes Committee, King's College London Maths School

Donna Catley

- Paid employee of Compass Group; Company Director, Compass Group UK&I (ended 31 December 2022)
- Paid employee of Diploma plc, from 1 September 2023

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

Jon Coles

- United Learning Trust
- Learning Partners Academy Trust
- Chief Executive, United Learning (group of schools from which some students will progress to King's)

Paul Goswell

- Trustee of the Somerset House Trust
- CEO of Delancey Real Estate Asset Management
- Cape Projects Limited; Cortx Holdings Limited; Croydon Plaza Limited; Delancy (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; 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;
- Ownership (part): Penninsular Projects Ltd, Cortx Holdings Ltd, Delancey Real Estate Debt Services Ltd
- Member of the RICS

Vinay Jha

- Full-time employment as 'Chief Innovation and Digital Officer' at M&G Plc. (ended September 2023)
- Full-time employment, Chief Tech Officer & EMT Member, Diligenta Ltd

Shitij Kapur

- Vice-Chancellor & President, King's
- 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, Collegiate Council, University of London
- Commissioner, International Higher Education Commission
- Chair, UUK Advisory Group on Free Speech & Academic Freedom

Ron Kerr

- Guys and St Thomas' Foundation Trustee
- NED, Guy's and St Thomas' Enterprises Ltd.
- Advisor to Board: Guy's and St Thomas' NHS Foundation Trust
- Chair: NHS Providers
- Ad hoc consultancy services

Steve Large
- Senior Vice President (Operations), KCL
- Superannuation Arrangements of the University of London (SAUL)
- KCL Ventures Ltd
- King's Talent Bank Ltd
- King's College London Business Ltd
- College Facilities Ltd
- Fellow of the Chartered Association of Certified Accountants
- Member of the Chartered Institute of Management Accountants

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

Rachel Mills
- Senior Vice President (Academic)
- Visiting Professor (unpaid) University of Southampton, July 2021 onwards.
- Non-Executive Director, Centre for Environment, Fisheries and Aquaculture (2021 onwards)
- Fellow Royal Society of Chemistry
- Fellow Royal Society of Biology
- Member, Challenger Society for Marine Science

Kim Piper
- Dean of Education, Faculty of Dentistry, Oral and Craniofacial Sciences
- UCAT Trustee
- Health Education England - Training Program Director for Oral & Maxillofacial Pathology. National ARCP and Recruitment member
- Royal College of Pathologists - Chair of Examiners
- Royal College of Surgeons - SAC Member
- International Association of Dental Research - Group Program Chair
- British Society of Oral& Maxillofacial Pathology Executive Committee

Clare Sumner
- Director, Policy for the BBC

Richard Trembath
- Senior Vice President, Health & Life Sciences, Professor of Medical Genetics, Faculty of Life Sciences & Medicine, KCL
- Executive Director, King's Health Partners
- Director & Trustee, The Francis Crick Institute
- Non-Executive Director, King's College Hospital
- Non-Executive Director, MedCity Life Sciences Advisory Board
- Board Director, UK Biobank
- Non-Executive Director, MedCity
- 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

Nhuoc Lan Tu
- Self-employed Consultant
- Board member and Chair of Compensation Committee (from March 2022, WNS Holdings Ltd.
- Non-Executive Director and Senior Independent Director (from March 2022) – Shawbrook Bank Ltd
- Non-Executive Director – Shawbrook Group PLC
- Board Advisor – Mental Health at Work CIC
- Director, Lonsdale Road (Barnes) Management Company Ltd
- Member, National Association of Corporate Directors, USA

Stephan Weiner
- Guy's & St Thomas' Trust (GSTT) – Non-Executive Director and Chair of Transformation and Major Programmes Committee (left GSTT Finance Committee in January 2023; left Board in June 2023)
- King's College Hospital (KCH) – Non-Executive Director and Chair of Major Programme Committee and Finance Committee (KCH Finance Committee membership ended January 2023; KCH Board membership ended October 2023)
- MediClinic – Non-Executive Director, Chair of Remuneration Committee (ended May 2023); Crown Commercial Service - Non-Executive Director, Chair of Audit Committee

King's College Council	
Meeting date	21 November 2023
Paper reference	KCC-23-11-21-04
Status	Final

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 2023	KCC-23-11-21-04.1	Approve
4.2	Council Calendar of Business	KCC-23-11-21-04.2	Note
4.3	Actions Log	KCC-23-11-21-04.3	Note
Report of the Finance Committee		KCC-23-11-21-09.1	
09.1	(i) Bush House South West Wing Update	Annex 4	Note
	(ii) Champion Hill Deal Update	Annex 6	Note
	(iii) Treasury Management Proposals		Note
	(iv) Organisation of the Finance & Procurement Directorate		Note
Report of the Audit, Risk & Compliance Committee		KCC-23-11-21-09.2	
09.2	(v) Annual statement regarding the Prevent Duty	Annex 3	Approve
	(vi) Annual Research Integrity Statement	Annex 4	Approve
	(vii) Annual College Safeguarding Report	Annex 5	Approve
	(viii) Internal Assurance update		Note
	(ix) Compliance Assurance update		Note
Report of the Estates Strategy Committee		KCC-23-11-21-09.3	All to note
09.3	(i) Residences Strategy		
	(ii) Advance Viral Vectors		
	(iii) Bush House South West Wing – Update		
	(iv) Major Projects Status Report		
	(v) Report of the Director of Estates & Facilities		

Report of the Staff & Culture Strategy Committee	KCC-23-11-21-09.4	All to note

09.4   (i)   Staff Survey
      (ii)   Student Success Transformation Programme
      (iii) Role of the Committee		

Report of the Academic Board	KCC-23-11-21-09.4	All to note

09.5   (i)   Academic Board Standing Committee Reports
      (ii)   Chair's Actions
      (iii) Election of Associates of King's College (AKC)		

Report of the Governance & Nominations Committee	KCC-23-11-21-09.4	
09.6 Appointment of Independent Co-opted Member of ARCC	Annex 1	Approve

See published minutes from the previous meeting here

Council Business Plan

Action required

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

Paper Explanation for Members

Why is this paper being presented?	This Council business plan is presented at each meeting of GNC and Council for information and is intended to provide some guidance as to what members might expect to see on their meeting agendas over the course of the year.
What are the key points/issues?	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 note.

Paper Submitted by:

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

Council Business Plan

Strategic discussion

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

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

Regular Agenda Items

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

- Finance Committee
- Audit, Risk & Compliance Committee
- Estates Strategy Committee
- 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 Business Plan

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

	Item	Council Action	Submitted By
20 September 2023 **AWAY DAY**	**Strategic focus meeting – full day**	Discuss	Principal & Senior Executive Team
21 November 2023 **Council Room** **(Business focus)**	*Financial Statements*	**Approve**	Finance Committee
	Update on Five-year Forward Plan for OfS	**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 Research Integrity Statement	**Approve**	Audit, Risk & Compliance Committee
	Annual College Safeguarding Report	**Approve**	Audit, Risk & Compliance Committee
	Development of the Board Assurance Framework	**Approve**	Audit, Risk & Compliance Committee
	Annual OfS Registration Report	**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
	School of Medical Education Branch Campus at University of Portsmouth	**Approve**	Academic Board
	Student Success Transformation Programme – update	**Note**	Finance Committee
	King's Interdisciplinary Science (Phase 1) – Full Business Case	**Approve**	Estates Strategy Committee & Finance Committee
	Annual Report of the Remuneration Committee	**Note**	Remuneration Committee
	Champion Hill Deal Update	**Note**	Estates Strategy Committee & Finance Committee
	Bush House South West Wing Update	**Note**	Estates Strategy Committee & Finance Committee
	Annual Report of the ARCC	**Note**	Audit, Risk & Compliance Committee
	Internal Assurance Update	**Note**	Audit, Risk & Compliance Committee
	Compliance Assurance Update	**Note**	Audit, Risk & Compliance Committee

18 January 2024 **Council Room** **(Strategic focus)**	Governance Review	**Approve**	GNC
	Modern Slavery Act Annual Statement	**Approve**	Chief Procurement Officer
	Champion Hill	**Approve**	ESC/FC
28 March 2024 *Teams* *(Business focus)*	*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
	Advanced Therapies - AAV Expansion Business Case	**Approve**	Estates Strategy Committee & Finance Committee
	Centre for Translational Medicine	**Approve**	Finance Committee
9 May 2024 **Denmark Hill Campus** *(Strategic focus)*	**Strategic Issues (TBD)**		
	Bush House SouthWest Wing – Outline Business Case	**Approve**	Estates Strategy Committee & Finance Committee
10 July 2024 **Bush House** *(Business focus)*	*Financial Plan*	**Approve**	Finance Committee
	Council Away Day agenda for September	**Note**	Governance & Nominations Committee
	Meeting Cycle for the next year but one	**Note**	Governance & Nominations Committee
	Fundraising Operations Annual Report	**Approve**	Audit, Risk & Compliance Committee
	Fundraising Ethics Review Group Annual Report	**Approve**	Audit, Risk & Compliance Committee
	Report on senior team performance and remuneration	**Discuss**	Remuneration Committee
	KCL/KCLSU Memorandum of Understanding	**Approve**	Vice-Chancellor & President
	Reappointment of Members	***Approve***	*GNC*
	Memorandum of Understanding – KCL/KCLSU	***Approve***	*KCLSU President &Vice-Chancellor & President*

King's College Council

Meeting date	21 November 2023
Paper reference	KCC-23-11-21-04.3
Status	Final

Actions Log

Action required

☐ For approval
☐ For discussion
☒ To note

Executive summary

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

Actions Log

Meeting	Minute	Topic	Decision for Action	Notes	Owner	Original deadline	Progress
12-07-23	6.4	Annual Report of the Fundraising Ethical Review Group	███████████████████	████████	The Chief Compliance Officer and the Chief Finance Officer	N/A	In progress
11-05-23	7.2	Portfolio Simplification Programme	Information to be provided at a future meeting re the financial objectives of the programme and whether they had been achieved		Principal	N/A	In progress
18-01-23	10.2	Social Mobility & Widening Participation	Background information on the strategy & requirements to be provided at a future meeting		Principal	N/A	In progress
22.11.22	5.3	Student Success Transformation Programme	Opportunities for Council to scrutinise the programme implementation		VP (Education)	Throughout 2023	Ongoing – on agenda
23/11/21	7.1 (iii)	LIHE	Review of benefits two to three years out against what was promised.		SVP (Operations)	Not due until 2023 or 2024	In progress

Irene Birrell
College Secretary
November 2023

Meeting date	21 November 2023
Paper reference	KCC-23-11-21-07
Status	Final
Access	Members and senior executives

Report of the Vice-Chancellor & President

Action required

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

Paper Explanation for Members

Why is this paper being presented?	Report from Vice-Chancellor & President highlighting current issues and events and developments since the last meeting of Council.
What are the key points/issues?	Admissions, King's Digital, SUSTech, Campus Futures, PFI insourcing, AI courses, senior appointments, UUK FoE Group
What is required from members?	To note

Paper Submitted by:

Professor Shitij Kapur
Vice-Chancellor & President

Report of the Vice-Chancellor & President

Section A - Current topics

Admissions update:

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King's Digital:

Vision 2029 articulates a bold ambition for King's to be a leader in online education by the end of the decade. Following a significant contractual renegotiation with Boundless Learning (formerly Pearson Online Learning Services) that concluded earlier this year, we are now able to make a step change in the development and delivery of our distance learning to realise this objective. Building on our advancements as King's Online, but under a new internal brand and operating model, we have formed King's Digital.

University Executive recently approved the first of a two-phased business cases to enable the necessary and immediate growth of King's Digital which has three divisions:
- Content Production
- Operations
- Student Support

Working closely with Faculties, our Content Production Division (previously known as King's Online) is responsible for the design and development of online materials. Our Operations Division is responsible for the planning, coordination and management of online provision, including portfolio and pipeline oversight; third party and faculty coordination; and programme performance management. Our Student Support Division is responsible for providing a dedicated, front-line and non-academic student management service to distance learners at King's. Online student acquisition will continue to be outsourced to an alternative provider on a competitive fee for service basis as opposed to the revenue share arrangement historically operated with Boundless Learning.

Campus Futures:

The Campus Future Programme (CFP) has been set up to oversee and ensure timely delivery of the transformation of our campuses required to achieve Strategy 2026 Goals and longer-term Campus sustainability ambitions. This Programme is informed primarily by the 2023 Strand-Waterloo Masterplanning Framework presented to Council in September 2023 along with existing Masterplanning and Estates prioritisation for our Health Campuses. The University Executive have approved £3.7m from SCIF to build the CFP management team over the next three years, including embedding support for new ways of working into Faculties.

The three immediate priority projects within the CFP are:
1. Delivery of the Estates component (£34m) for implementation of the **King's Interdisciplinary Science** project. The Full Business Case will be considered at November Council which has been fully scrutinised and tested through King's Governance structures and represents value for money and close alignment to Strategy 2026 Goals with new teaching spaces coming online for 2024 and phase 1 project completion by 2026.
2. **Strand-Waterloo Reconfiguration**: the most time critical element of which is the vacation of the Virginia Woolf Building and reconfiguration of our Strand-Waterloo Campuses within footprint, enabled by new ways of working, informed by the 2023 Masterplanning Framework. Scope, scale and timing of individual move projects to be defined by January 2024 ready for implementation from 2025 onwards.
3. Redevelopment of **Bush House South-West Wing** to complete the development of the Student Precinct adjacent to the pedestrianised Strand and accommodate our planned growth with novel infrastructure solutions for new ways of working. UE are considering the release of the next tranche of funding (£3.1m) in November, to progress the design to the next gateway. The Full Business Case will come forward for consideration in 2024 with delivery in 2026.

Other projects will be developed across our wider London campuses as the CFP progresses and the Governance Structure has been designed for future scaling of activity.

PFI insourcing

We are progressing with the insourcing of Facilities Management services from New Hunts House (NHH) and the Franklin-Wilkins building (FWB) into King's from August next year when the current PFI deal comes to an end. These buildings have been managed by our service partner Bouygues since 1999 to provide vital services for teaching and research. They were built as part of a highly successful 25-year Private Finance Initiative (PFI) contract between King's and Bouygues which comes to an end in August 2024. This decision follows on from the insourcing of over four hundred cleaning and security staff in 2019 previously employed by contractors Atalian Servest and CIS to become directly employed by King's into the then, newly formed Cleaning and Security (CSS) department in Estates & Facilities.

King's Academy Generative AI course.

King's Academy has designed a new Generative AI in HE course designed as a starting point for developing AI literacy. The course explores foundational concepts and big debates, AI applications in teaching, learning and assessment practices and considers some of the key implications for student employability in a rapidly changing landscape. The course is free via the FutureLearn platform.

Senior Appointments

Vice President (People & Talent)/Chief People Officer

Fiona Roberts has been appointed Vice President (People & Talent)/Chief People Officer. Fiona will join King's at the start of January from the Francis Crick Institute where she currently holds the role of Chief People Officer. In addition to her work at the Crick, Fiona brings a depth of experience from her work at the Open University where she was Group Human Resources Director and at Volkswagen as Human Resources Director. I wish to express my thanks to Professor Stephen Bach who took on the role as Interim Vice President (People & Talent) alongside his role as Executive Dean, King's Business School. I would also like to thank Brent Dempster, Director of HR, who will step down from his role at the end of the calendar year.

Executive Director of Communications & External Affairs

Tania Rhodes-Taylor has been appointed Executive Director of Communications & External Affairs. Tania will join us from mid-January from Otus Advisory Limited where she was CEO. Otus is a global consultancy and coaching practice that helps universities enhance their strategic ability to engage with their stakeholders and partners. Before this Tania has held leadership positions in universities in both the UK (Queen Mary) and Australia (University of Sydney) and worked in industry and government.

UUK Freedom of Speech and Academic Freedom Advisory Group

I have agreed to chair UUK's new Advisory Group on freedom of speech and academic freedom. The Group will shape UUK's engagement with the Office for Students (OfS) as they implement the Higher Education (Freedom of Speech) Act. King's hosted Professor Arif Ahmed, the new Director for Freedom of Speech and Academic Freedom at the OfS as part of our AKC lecture series on 9 October 2023 – his first speech since taking up his post.

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

- 4thJuly – European Australian Business Council delegation visit
- 17th July – UUK Freedom of Speech and Academic Freedom Advisory Group meeting
- 19th July – UCEA Heads of Institution meeting
- 25th to 30th July – Trip to Nigeria to sign MoU for Afe Babalola donation for transnational education; meet alumni and representatives from British Council, National Universities Commission and British High Commission.
- 6th Sep – UUK Annual Conference
- 7th Sep – Tour of Here East and Plexal
- 12th Sep – Chelsea College of Arts President's Reception
- 20th Sep – Lord Jim Knight dinner at House of Lords
- 21st Sep – Russell Group away day
- 25th Sep – meeting with Mark Hallett, Courtauld Institute of Art
- 6th Oct – University of London Collegiate Council
- 12th Oct – KHP Conference
- 12th Oct – Dinner with Microsoft
- 16th to 18th Oct – PLuS Alliance meeting in Canberra and Sydney
- 31st Oct - Prof Dame Jessica Corner, UKRI Chair visit
- 1st Nov - Matt Western MP visit

Section C - Media Coverage

- According to the latest research from Sensu Insight, over the last year, mentions of King's and our reach has increased by 48%, which is the biggest increase among our competitor set. Mentions of our mental health research is particularly strong, placing us above Oxford, Cambridge, UCL and Imperial. This includes our 'Mind of the Matter' series of videos in partnership with YouTube, King's Health Partners and South London and Maudsley NHS Foundation Trust. So far, this series of 31 videos has achieved a total watch time of 3,000 hours, 132k plays and 14m impressions. There have been over 400 new subscribers coming directly from the playlist. Videos promoted on YouTube's homepage during Mental Health Awareness Week attracted over 13m impressions and 59k views.
- Our academics are providing their expertise to comment in the media on the Middle East, including Professor Sir Lawrence Freedman who featured in The Daily Telegraph, Dr Ahron Bregman was interviewed in the New Statesman, Professor Peter Neumann was quoted in The Daily Telegraph and The Guardian, and Professor Vernon Bogdanor wrote a comment piece for The Daily Telegraph. Dr Jack McDonald was also quoted in The Economist,
- New imaging and scientific investigations by a team including a King's academic has found traces of the original paint used to decorate the Parthenon Sculptures, revealing they were once in fact brightly coloured. This news was covered in the Guardian, Daily Mail, CNN, CNN Arabic, Smithsonian Magazine, the Miami Herald, the Charlotte Observer, and ABC Spain (Spanish).
- A study by researchers from King's and funded by Cancer Research UK, found that over two million years of life are lost to cancer in the UK every year. The study also showed that a fifth of the total lost years are from lung cancer (more than 500,000 per year), due to the high number of people diagnosed and poor survival. More than 213,000 years of life are lost to bowel cancer each year and around 197,000 to breast cancer. This was covered in The Daily Telegraph, the Daily Mail, the Evening Standard, Press Association, the Daily Express (print) and Sky News.
- Research by Dr Paul Cawley from the School of Biomedical Engineering & Imaging Sciences and Evelina London Children's Hospital has found major advances for detecting brain conditions in babies using portable MRI scanners. This news was featured in the Evening Standard, The Independent, the Daily Mail and Press Association.

- [Analysis by the Policy Institute](#) and the Centre for Transforming Access and Student Outcomes in Higher Education (TASO) has found that reported mental health problems among university students have almost tripled in recent years. This was covered in [The Daily Telegraph](#), Press Association, [Sky News](#), the [Daily Mail](#), [Times Radio](#) and [The Epoch Times](#). On this subject, we recently launched the [new Student Mental Health Evidence Hub](#) – developed by TASO and a consortium of expert partners, including researchers from King's College London.

Shitij Kapur, Vice-Chancellor & President
November 2023

King's College Council	
Meeting date	21 November 2023
Paper reference	KCC-23-11-21-08
Status	Final
Access	Public/Members and senior executives

KCLSU President's report

Action required

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

Paper Explanation for Members

Why is this paper being presented?	King's College Council receives a report from the King's College London Students' Union (KCLSU) at each of its meetings. This is the first paper for 2023-24.
What are the key points/issues?	- Introducing the 2023-24 sabbatical officers - Officer objectives that may be relevant to College Council business this year - Team priority campaigns
What is required from members?	It will be appreciated by the officers' team if members can help in refining the objectives, direct officers to relevant support channels and members who can cooperate and help in achieving the goals

Paper Submitted by:

Steven Suresh

KCLSU President

KCLSU President's Report

President – Steven Suresh

steven.suresh@kclsu.org

I am a 2nd Year PPE student and I have earlier been involved in KCLSU as the co-founder and co-president of Formula 1 Society. As the President, I lead my officer team and represent KCLSU and the student body at the College Council. I oversee every KCLSU initiative and its execution. I advocate for, promote and co-create policies with the university, for the betterment of the student body.

VP Education (Health) – Janvi Jagasia

janvi.jagasia@kclsu.org

I am a 2nd Year Biomedical Science student. I was the co-founder and co-president of the Formula 1 Society at KCLSU. As Vice-President Education (Health), my responsibility is to ensure that students within the Health faculties receive the representation they deserve and that their voices are effectively conveyed to the university administration.

VP Activities & Development – Thea Turton

thea.turton@kclsu.org

I am a 3rd Year Religion and Politics Student. I was the President of Theology and Religious Studies Society. Previously I was a KCLSU trustee. In my role as VP Activities and Development, I oversee KCL-KCLSU interactions at society, media and sports group level. I also support KCLSU societies to run smoothly and effectively.

VP Welfare & Community – Hassan Ali

hassan.ali@kclsu.org

I am a 2nd Year Digital Culture and Media Student. At KCLSU, I have worked as a committee member for various societies namely Islamic Society and King's Investment Society. In my capacity as the VP Welfare and Community, I advocate for student welfare, better mental health support and improved student services. Through my role, I try to foster a sense of community among students.

VP Postgraduate – Alizeh Abrar

alizeh.abrar@kclsu.org

I am currently completing my Masters in Medical Ethics and Law. During my time at King's, I have actively engaged in various academic and extracurricular activities, fostering a well-rounded educational journey, and forming lasting connections with peers and mentors. As another member of College Council, I strongly advocate for PG Students and their distinct demands and problems.

	VP Education (Arts & Sciences) – Sadaf Abbas Cheema
	sadaf.abbascheema@kclsu.org
	I have graduated in International Relations in 2023. I have been heavily involved with KCLSU, having served as President and Committee member of various societies. As VP Education for Arts and Sciences I represent education-based interests of students in Arts and Sciences faculties. I advocate for an enhanced educational experience for students.

KCLSU Sabbatical Officer objectives of particular interest to College Council

Below we have identified officers' objectives that are particularly relevant to College Council business. As well as keeping College Council updated on how our plans develop, we are keen to hear any input from College Council members on how we can effectively collaborate with you and align with work that is already taking place within KCL and its faculties.

KCLSU President - Steven Suresh

● **Housing Accessibility Objective:** To prioritise affordable housing options that alleviate students' financial burdens and enhance academic concentration.

● **Mental Wellness Objective:** To bolster mental health services, enabling students to better cope with stress.

● **Financial Aid for Education Objective:** To expand financial support mechanisms, such as scholarships and flexible payments, ensuring education remains accessible irrespective of financial challenges.

● **Officer Accountability:** To ensure effective representation of student concerns, which leads to a more inclusive and student-oriented academic setting.

VP Education (Health)- Janvi Jagasia

● **Streamlining the Mitigating Circumstances Process:** This includes simplifying the application process, clear guidelines for students in terms of the evidence required and ensuring that prompt decisions are made. This will minimise disruptions for students and offers immediate support.

● **Optimising Assessment Timetabling:** Early release of exam timetables, releasing schedules ahead with an appropriate time notice which ensures ample preparation. Last-minute schedules can result in stress and financial burdens for international students such as high-cost airline fares.

● **Academic Calendar Stress Reduction:** Ensuring that students do not have multiple exams on the same day. In addition, addressing the issue of unevenly distributed examination periods by ensuring that there is a balance in the number of exams held during both the January and June examination periods.

VP Activities and Development- Thea Turton

● **Supporting student groups with KCLSU operations** (e.g accessing finance, external speakers and room bookings procedures, risk assessments)

● **Improving activities and training opportunities** for student leaders

● **Reviewing visibility of processes and communication** between KCLSU / KCL and student groups

VP Welfare and Community- Hassan Ali

● **Interfaith Education Events:** Organize educational events promoting interfaith understanding to enrich the academic experience.

● **Inclusive Academic Calendar:** Develop a calendar that avoids religious conflicts with seminars and exams, prioritizing academic continuity.

● **Supporting Neurodivergent Students:** Enhance mental health and well-being support for disabled and neurodivergent students, improving their educational journey.

● **International Student Scholarships**: Expand scholarships for international students through KCL Alumni, fostering educational access.

● **Alumni Achievement Exhibition:** Showcase an exhibition celebrating KCL Alumni's success to inspire current students academically.

VP Postgraduate- Alizeh

● **Increasing visibility & the sense of belonging for Postgraduate students on Campus**: Increasing engagement and the sense of belonging postgraduates have with KCLSU and King's. Developing postgraduate specific academic and community events and ensuring this offering is visible and communicated to students.

● **Self-certifying mitigating circumstances policy**: Advocating for KCL's implementation of self-certifying mitigating circumstances and pushing for more flexible and supportive policies around accepted reasons and supporting evidence.

● **International Students' Support:** Working with the University to provide more tailored support for postgraduate international students, especially around the transition period, to equip them with the tools to thrive in the UK Higher Education system.

VP Education (Arts and Sciences)- Sadaf Abbas Cheema

● **Address Overlapping Deadlines:** Explore and mitigate the impact of overlapping deadlines on students, collaborating with the university and advocating for policy changes.

● **Promote Religious Inclusivity:** Advocate for religious inclusivity in timetabling, addressing issues like Friday Prayer conflicts for Muslims and exploring ways for students to declare religious obligations before timetable release.

● **Cultivate Cross-Cultural Connections:** Host discussions led by leaders from underrepresented backgrounds to break barriers and foster cross-cultural empathy between students and academics.

Officer Team Priority Campaigns

The purpose of Priority Campaigns are to ensure the effective use of KCLSU-wide expertise, relationships, and resources to scale up campaigning throughout the year. They are run by a KCLSU working group with members from different teams whose insight and expertise is relevant to the issue being addressed.

Cost of Living campaign- Steven, Thea and Hassan:

The Cost-of-Living Crisis, referring to the fall in disposable incomes since late 2021, has placed significant financial pressure on the student population of the UK and especially those in London. The Russell Group Students' Unions (RGSU) commissioned a survey in January 2023 to investigate the impact of the Cost-of-Living Crisis on student experience. The survey found that: 99% of King's students are concerned about the cost-of-living crisis.

'KCL: Thrive not survive' is a KCLSU led campaign to support KCL students during the Cost of Living (COL) crisis by advocating for accessible and affordable quality housing, financial aid and fixed and flexible tuition fees.

The 3 sub-priorities of the campaign include:

1. **Accessible and affordable quality housing**
2. **Financial aid**
3. **Fixed and flexible tuition fees**

The aims of this campaign are:

- To introduce a Rent Guarantor Scheme
- To increase the quality and quantity of financial aid
- To increase the number of tuition fee instalments
- To increase the sense of belonging and student experience by alleviating the financial pressures felt by students.

Timetabling campaign- Janvi, Alizeh and Sadaf:

Timetabling is covered by the 'Organisation and Management' and 'Assessment and Feedback' categories in the NSS, which have historically been King's weakest areas. King's had the lowest score in 'Organisation and Management' out of all the Russell Group universities in 2022, moving up one place in 2023. Timetabling issues have had severe impacts on student mental health and in some faculties have compromised the ability to fulfil course requirements such as placements.

'Turn the Tables' is a KCLSU led campaign that calls for a compassionate, flexible and transparent approach to timetabling which prioritizes student wellbeing, respecting students' academic and non-academic commitments.

The 3 sub-priorities of the campaign include:

1. **Planning and release of timetables for teaching and assessments**
2. **Assessment planning and formatting**
3. **Deadline bunching**

The aims of this campaign are:

- To increase student satisfaction rates with 'Organization and Management' and 'Assessment and Feedback' categories on the NSS.
- To ensure that students feel informed about their timetables.
- To ensure that there is flexibility/leniency regarding timetabling, taking into account students who have a part-time job or have placements.
- To communicate to students more effectively if and when there are delays in timetabling

King's College Council

Meeting date	21 November 2023
Paper reference	KCC-23-11-21-09.1
Status	Final

Report of the Finance Committee - Reserved

Contents	Meeting at which considered	Consent agenda	Council action
1. Financial Statements Year Ended 31 July 2022 and Auditor's Management Letter* [Annex 1] [* see 09.2 ARCC report]	13 November 2023	No	Approve
2. Five-Year Forward Plan [Annex 2]	13 November 2023	No	Approve
3. King's Interdisciplinary Science (Phase 1) Full Business Case [Annex 3]	13 November 2023	No	Approve
4. Student Success Transformation Programme [Annex 4]	13 November 2023	No	Note
5. Investment Subcommittee Annual Report [Annex 5]	13 November 2023	No	Note
6. Bush House South West Wing – Update	13 November 2023	Yes	Note
7. Champion Hill Deal – Update [Annex 6]	13 November 2023	Yes	Note
8. Management Accounts Month Two (September) 2023/2024	13 November 2023	No	Note
9. Treasury Management Proposals	13 November 2023	Yes	Note
10. Organisation of Finance and Procurement Directorate	13 November 2023	Yes	Note

For Approval

1. **Financial Statements Year Ended 31 July 2023 and Auditor's Management Letter* - Annex 1**
   [* see 09.2 ARCC report on the Council agenda for the Auditor's Management Letter Annex]

   Motion: **That the Consolidated Financial Statements 2022-23 be approved and that Council adopt the going concern assumption for the 2022-23 financial statements.**

   Background:

   Preparation and publication of the Financial Statements is a regulatory requirement for the University, and Audit, Risk and Compliance Committee (ARCC) and Finance Committee have responsibility for reviewing their audit and preparation. The financial statements and draft audit opinion were considered by ARCC on 7 November and Finance Committee on 13 November.

   The results show a solid financial performance, in line with the marginal over-performance against budget shown in the monthly management accounts.

   The going concern assumption has been adopted in the preparation of the financial statements. Council, as the University's governing body, is responsible for ensuring the going concern assumption is reasonable.

   The Vice-President (Finance) reported that the process to close the 2022-23 financial year and to produce the financial statements had been a smooth one, especially considering that the process was being managed by an entirely new team. The external audit had gone well, and the auditors had

reported very few control issues of note. One minor audit adjustment was made, to reclassify tuition fee income. The forecast for the operating surplus at the start of the year had been breakeven. This largely reflected a judgement that there would be little growth in tuition fee income over the period. However, an operating surplus of £31m was returned, which was approximately the same as the outturn in the previous year. The surplus was attributed to improvements in efficiency, better than expected returns from investments owing to increased interest rates and commercial negotiations which had a positive effect on the financial statements. These factors were considered to have contributed to the operating surplus in equal measure.

It was noted that cash balances appear to be very strong currently, which is largely attributable to the fact that the University is in a planning and preparation phase for several of its major capital works and cash is yet to be committed on them. Land value has decreased in the balance sheet, largely because of market forces. There is still a liability provision on this year's accounts for £330m for the King's contribution to the USS deficit in the future.   This will reduce to zero next year, owing to the recent valuation of the USS fund. and the fund moving from a deficit to a surplus This will have a major impact on the face of the accounts next year and will need to be explained to stakeholders very carefully. There is no cash implication of this change.

A formal assessment has been undertaken by the Finance Directorate, and scrutinised by the external auditors, to demonstrate that the University is a going concern. This analysis shows that the University has sufficient liquidity and assets to operate for a 12-month period. The outcome withstood stress testing under a number of scenarios, including if the financial position were to be adversely impacted by bank covenants.

The Chair of the Audit, Risk and Compliance Committee confirmed that he and another member of the Committee had met with the auditors to discuss the audit privately, and its outcome had been fully discussed in the ARCC meeting. There were no real concerns arising from the audit, although ARCC will keep the auditors' recommendation to improve Disaster Recovery in IT in view, since this had already been picked up in an internal assurance review. In discussion, members of the Finance Committee noted that the risk to financing the strategic growth of the University from the disproportion of income brought in from abroad needed to remain in focus for management.

2. **Five-Year Financial Forecasts to the Office for Students (OfS) - Annex 2**

   Motion: That the Five Year Financial Forecast for submission to the Office for Students (OfS), be approved.

Background:
The OfS requires the annual submission of five-year financial forecasts (current year plus next four years) by regulated institutions. The OfS also requires approval of the forecasts by the institution's Council. OfS may respond to the individual submissions with further questions. Given the financial strength of King's, it is unlikely that any subsequent questions will be anything other than technical clarifications.

The projections align with the three-year budget agreed in July, with the next two years representing a continuation of progress toward generating a £100million (real terms 2022/23) surplus.

It was noted that the projections did not include specific spending on carbon net zero, although SCIF expenditures will include some of these. While the University is committed to building the net zero plan, current staff resource is a limiting factor in delivery of the plan. The Committee pointed out that for future it would be important that our financial forecasts reference our public commitments around issues such as carbon net zero.

3.   King's Interdisciplinary Science (Phase 1) Full Business Case - Annex 3

Note: The following motions are jointly proposed by the Finance Committee and the Estates Strategy Committee.

Motions:

      (i)   **That Phase 1 of the long-term plan be approved in principle by Council, as outlined in the Full Business case at a total net cost to King's of £34M, with individual capital projects being submitted to the Estates Strategy Committee for review and approval with respect to estates elements.**

      (ii)   **That Council notes ongoing options appraisal/scoping work for Phase 1.5/2, with outcome of the appraisal expected within c12 months.**

Background:

The purpose of the KIS programme is to permit financially sustainable growth in natural sciences research, education and impact, through a substantial increase in research active academic staff numbers, new education programmes (UG+PGT) to increase student numbers, and intensification and expansion of the estate to enable this growth. Through each aspect, the programme aims to deliver cutting-edge, forward-looking activity, with a particular focus on interdisciplinarity and problem solving. This will also be an opportunity to contribute to wider university aims, including in equality, diversity & inclusion, in digital, and in climate & sustainability. The objectives of KIS are:

1. To deliver world-class research in the natural sciences, enabling access to rapidly growing Government investment in STEM and improve future REF outcomes. This will require expansion of academic capacity to ensure critical mass, particularly in chemistry.

2. To use expansion of natural sciences expertise to enhance multidisciplinary research across all Faculties, leveraging existing strengths in other disciplines and delivering University strategic priorities. This is what will make King's distinctive from its competitors.

3. To create an innovative educational portfolio that will simultaneously contribute to University-level education ambitions (e.g., focus on employability) and ensure a sustainable academic economy.

4. KIS is not the vehicle for building capacity in AI or data science (this fits better with engineering, health and "living well" initiatives) but will incorporate aspects of both (although no programme co-dependencies).

KIS is designed in three phases:

•   The current business case focuses on Phase 1 of the long-term plan, which will be delivered rapidly using existing estate, through moves and refurbishment. This will allow recruitment of 65 academic staff, creation of a new Natural Sciences UG degree (150 student intake) and 2 MSc programmes (80 students) and will deliver new interdisciplinary research centres in high-priority areas, across Faculties. Phase 1 is fully costed in the Full Business Case (FBC). While subsequent development phases would realise the full potential in these academic areas, Phase 1 is a substantial improvement on the current position and is a sustainable (though not optimal) standalone position.

•   Emerging plans for Phase 1.5 will cover relocation of the Chemistry Department from Britannia House (destination TBC), with new facilities enabling expansion of UG Natural Sciences to an intake of 240 students, and recruitment of an additional 23 academic staff.

•   Phase 2 covers a longer-term plan – in development – for further expansion, based on the creation of a substantial new collaborative research & education space (building), alongside further staffing and student expansion.

•   Both Phase 1.5 and Phase 2 will be presented as separate FBCs once estates solutions have reached an appropriate level of certainty.

Estates Strategy Committee and Finance Committee both considered this proposal and recommend

its approval in principle, with individual estates projects to return to the ESC for further approval as needed.

In discussion and in answer to questions it was noted that:

- While it was expected that the new academic programme would draw some applicants away from existing programmes, the net gain of the proposals would offset this, and the additional staff hired for the programme would be deployed across the system in teaching and research.

- If there were to be a significant change in international enrolment that impacted the financial provisions, recruitment of academic staffing could be slowed.

- Phase 1 will use existing estate entirely. Phases 1.5 and 2 would require additional physical space. It could be possible to stop at Phase 1 and still grow Chemistry, but the facilities and accommodation would be less than ideal as the Department would need to be located over two sites, one of which (Britannia House) is already known to be problematic.

- The expected balanced payback between teaching and research is unusual for King's as the degree of new research activity depresses the margin on the work

- Interest in Chemistry remained buoyant and market research demonstrated that focus on natural sciences is where peer institutions have had real success.

For Note

4. **Student Success Transformation Programme (SSTP) – Business Plan Update - Annex 4**
   Annex 4 updates the Council on developments in the Business Case and planning for SSTP. Keith Zimmerman, Executive Director of the Programme, noted that over the last six months the team has confirmed the diagnosis, rationalised existing projects - refocusing some, stopping others – and built engagement and support for the vision and approach. In the course of that work, it has become clear that the scope of SSTP as described last year is too broad and not sufficiently focused on the most crucial pain points. Staff workload has been an inhibitor of rapid progress.

   Not all the capabilities and capacity needed will be available within King's and the team is working with HR and Procurement to source those. However, it is also critical to understand that our future cannot be built by others and efforts are being redoubled to identify all available resource within King's and establish a viable secondment programme to make King's staff central to bringing about change.

   There is no request for increased spend - the Business Case presented is in line with existing approved funding of £13.3m in total for the financial years 2022/23 and 2023/24. The priorities for the next nine months are:
   - Assessment and marking processes
   - Curriculum management
   - Timetabling
   - Student support dashboard

   Finance Committee was supportive of the prioritisation and getting some quick wins. However, it stressed the importance of getting the project staffed and running as opposed to the budgeting and planning that have been the focus until now. Thought should be given to how the programme can be integrated into IPP and linked to the Simple/Nimble/Effective initiatives.

5. **Investment Subcommittee Annual Report - Annex 5**
   Finance Committee received the annual report of the Investment Subcommittee describing the investment performance and other stewardship issues of the King's College London endowment investment fund.

The Vice-President (Finance) noted that performance had been below benchmark by about 0.4 percent and that the longer term return was also marginally underperforming the benchmark. Cambridge Associates (the University's investment advisers) would be doing some work to assess the impact of the divestment from fossil fuels on performance and the appropriate benchmark return. Nonetheless, the University had received the expected revenue expenditure from the fund.

It was noted that the portfolio seemed to be relatively high risk, although that could be mitigated by the University's strong cash position. The Committee asked whether this level of risk would be common for the Russell Group universities. The Vice-President (Finance) took an action to find out.

6. **Bush House South West Wing – Update** [Consent Agenda]
The Outline Business Case is now expected to be presented in early 2024. RIBA stage 2 has identified a range of key design decisions which the University Executive team has discussed and provided direction on. It has also revised cost estimates, ███████████████████████████████████
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7. **Champion Hill Deal – Update - Annex 6** [Consent Agenda]
Annex 6 provides an update on the progress of the disposal of Champion Hill Hall of Residences on a Design-Build-Finance-Operate (DBFO) basis, the selected preferred bidder, and the next steps to progress the transaction. Owing to interest rate rises and increased capital costs, tender returns had been disappointing ███████████████████████████████████████ There was scope for the capital receipt to increase to ███████████████████████████████. Given the lower-than-expected return, the executive planned to look once again at the other options available to ensure this was the best way to proceed. There were no concerns about the successful bidder as a partner. They were confident that they would be able to bring the Halls back into use by 2025 which would add 750 beds to the University-owned stock. This would be advantageous for student recruitment for which the student accommodation guarantee was key.

8. **Management Accounts Month Two (September 2023-24)**

Finance Committee received its regular presentation of management accounts. While there were no concerns about the current set of accounts at month two, a potential risk with respect to future tuition fee income was identified, based on a drop in uptake of places this year by both domestic and international students that could cost an estimated £30million. This year that would be mitigated by anticipated savings in staff costs and improvements on interest earned, but whether this was a one-year blip or representative of a significant change in applicant behaviour was yet to be seen and was a critical risk to understand and monitor.

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10. **Organisation of Finance and Procurement Directorate** [Consent Agenda]
Finance Committee was informed of minor organisational changes in the Finance and Procurement Directorate and was updated on the appointment to the post of Director of Financial Performance.

Steve Weiner
Honorary Treasurer and Chair of Finance Committee
November 2023

See published Financial Statements

These pages have been redacted

Meeting date	21 November 2023
Paper reference	KCC-23-11-21-9.2
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 Letter of Representation (**Annexes 1 & 2**)	07 November 2023	No	Approve
2. Annual statement regarding the Prevent duty (**Annex 3**)	07 November 2023	Yes	Approve
3. Annual Research Integrity Statement (**Annex 4**)	07 November 2023	Yes	Approve
4. Annual College Safeguarding Report (**Annex 5**)	07 November 2023	Yes	Approve
5. Development of the Board Assurance Framework (**Annex 6**)	07 November 2023	No	Approve
6. Annual Report of the Audit, Risk and Compliance Committee (**Annex 7**)	07 November 2023	No	Note
7. Internal Assurance update	07 November 2023	Yes	Note
8. Compliance Assurance update	07 November 2023	Yes	Note
9. Risk presentations and discussions: Risks to the Student Success Transformation Project (**Annex 8**)	07 November 2023	No	Note

For approval

1.   External audit report and Letter of Management Representation

Motion: That the Council approve the External Auditors' Report for the year ended 31 July 2023 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 led by Finance staff, which had been recorded for others to view later. The Chair and Independent Member Mr Waseem Malik also met Ms Fleur Nieboer from KPMG prior to the ARCC committee 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 2023.

A summary of the external auditors' comments is provided in the annual report of the ARCC (section 6) in Annex 7 to this report. The ISA260 Audit Report is attached in **Annex 1**, and the Letter of Management Representation to be sent to KPMG is attached in **Annex 2**.

2.   Annual statement regarding the Prevent Duty

Motion: That the Council approve the Annual Prevent Statement for the year ended 31 July 2023.

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

Members of the ARCC recommended the Annual Prevent Statement to the Council for final approval. The Annual Prevent Statement is attached in **Annex 3**.

3.   Annual Research Integrity Statement

Motion: That the Council approve the Annual Research Integrity Statement for the year ended 31 July 2023.

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. A copy of the Annual Research Integrity Statement is attached in **Annex 4.**

4.   Annual College Safeguarding Report

Motion: That the Council approve the Annual College Safeguarding Report for the year ended 31 July 2023.

The ARCC considered the report of the College Safeguarding Steering Group for the 2022/23 academic year. This report reviewed the work of the Steering Group and the Safeguarding Oversight Group, which provides operational support to the Steering Group. The ARCC noted that engagement by the Oversight Group had been positive, and a number of key policies and procedures had been developed over the year. It was, however, noted that referrals to the Student of Concern procedure have been consistently increasing over the past five years from 494 in 2018 to 1864 in 2023. The Committee undertook to have a focussed risk discussion on this area of activity at its June 2024 meeting. A copy of the Annual College Safeguarding Report is attached in **Annex 5**.

5.   Development of the Board Assurance Framework

Motion: That the Council approve the recommendations set out in the BAF update paper.

The need for a Board Assurance Framework (BAF) for Council has been identified for some time, but its progress has been delayed due to a number of operational factors. Renewed momentum was given to the request for a BAF when a number of members with experience of using one as a governance and management tool in the NHS joined the Council. The recent Governance Review, conducted by AdvanceHE, has further supported the development of a BAF at King's, acknowledging that a sound assurance mechanism is a central plank of good governance. The discussion at the meeting focussed on some of the changes which would be made to the approach to considering risk at the Council's committees in future. The output of assurance reviews and other evidence relating to specific risks will in future be considered by the relevant expert committee of Council. The ARCC will curate the process, which will be administratively owned by the Secretariat. The update paper on the development of the BAF with recommendations, which was considered by the members of ARCC, is included in this report at **Annex 6**. Council are requested to approve the recommendations contained in the update paper.

For note

6.   Annual report of the Audit, Risk and Compliance Committee
The Audit, Risk and Compliance Committee has prepared a report, reviewing its work in the 2022-23 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 good

quality data for reporting to key public bodies were all adequate and effective. One matter to which the ARCC will pay close attention going forward is the Carbon Management Plan. The Committee will be seeking assurances from management that the commitments to net zero which are publicised by the College do fully align to its financial and budgetary plans.

Members of the Audit, Risk and Compliance Committee reviewed their annual report at this meeting and approved it for submission to the Council and to the accountable officer. The full report is attached in **Annex 7**.

7.   Internal Assurance update

The Committee received an update from the Director of Risk Assurance. At the time of the meeting, there were thirty-five recommendations made in previous audits which had gone beyond their target implementation dates. These spanned nine audits. There were acceptable reasons for the majority of the delays to implement the recommendations and management assured members that there were viable plans to clear down this backlog. Since the last ARCC meeting in June 2023, fifteen new internal assurance exercises had been completed. This included one investigation into the sale of valuable laboratory equipment to another university which did not follow any of the protocols for asset disposal set down in the Financial Procedures. The auditors have made recommendations to prevent a reoccurrence in the future.

8.   Compliance Assurance update

The risks of a compliance breach taking place in the College were considered by the Committee. Many of the assessment scores for the risks have remained static this term, although there were a few which had moved. The increased level of risk assessed in relation to the likelihood of a breach around anti-money laundering legislation relates to management's improved understanding of the "know your customer" (KYC) requirement, rather than any substantive change. The passing of the threat of prosecution by the HSE has reduced the likelihood score in the Health & Safety breach risk assessment. The assessment scores have also reduced for breach of compliance to research funder conditions (because recommendations from previous audits by funders are now fully implemented, and in Export Controls, where the appointment of an International Regulations Manager and his interventional work have started to have a positive impact. Compliance relating to Freedom of Expression legislation and regulations is now being tracked through the compliance map following the discussions at the last meeting of the ARCC.

9.   Risk discussion: Risks to the delivery of the Student Success Transformation Programme

Members of ARCC received a presentation on the Student Success Transformation Programme from Mr Keith Zimmerman, who is Executive Director of the programme, and Ms Lisa Bondesio, who is the Interim Programme Director. The presentation and discussion focused on the identification and management of risk to the successful delivery of the objectives of the programme. The full minute of the item is included in this report at **Annex 8**.
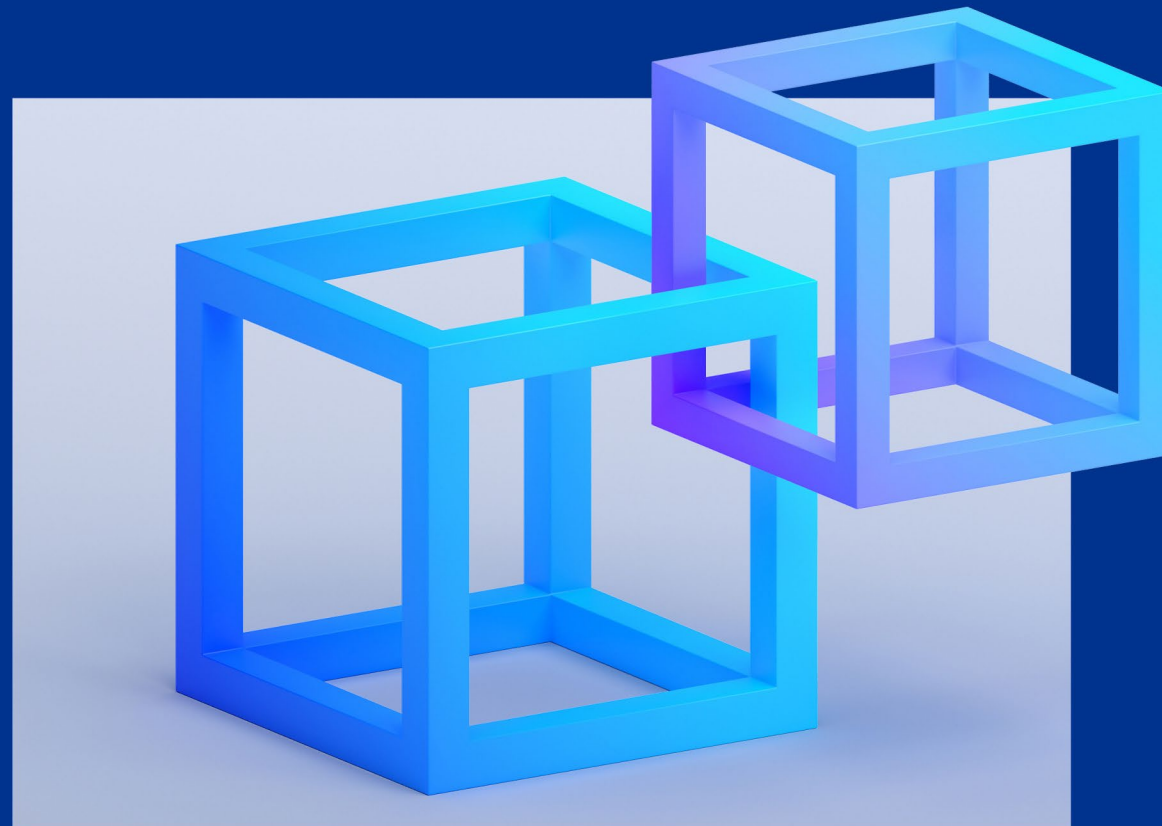
King's College London

Final Draft

Report to the Audit, Risk and Compliance Committee & Council

Consolidated financial statements for the year ended 31 July 2023

17 November 2023

Key contacts

Your key contacts in connection with this report are:

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Introduction

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

We were pleased to have the opportunity to meet with you on 7 November 2023 to discuss 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 2023.

We are providing this report in advance of our meeting to enable you to consider our findings and hence enhance the quality of our discussions. This report should be read in conjunction with our audit plan and strategy report, presented on 6 June 2023. We will be pleased to elaborate on the matters covered in this report when we meet.

Our audit is in progress, and outstanding matters are described at page 6. There have been no significant changes to our audit plan and strategy.

Subject to the Board's approval, we expect to be in a position to sign our audit opinion on the Board's approval of the financial statements and auditor's representation letter on 28 November 2023, provided that the outstanding matters noted on page 6 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
- Limitations on work performed
- Restrictions on distribution of this report

Yours sincerely,

Fleur Nieboer

17 November 2023

How we deliver audit quality

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

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

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

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

Important notice

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

Circulation of this report is restricted.

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

Purpose of this report

This Report has been prepared in connection with our audit of the consolidated financial statements of King's College London (the '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 2023.

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

Limitations on work performed

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

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

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

Status of our audit

Our audit is close to being complete. Matters communicated in this Report may change pending signature of our audit report. We will provide an oral update on the status. Page 6 'Our Audit Findings' outlines the outstanding matters in relation to the audit. Our conclusions will be discussed with you before our audit report is signed.

Restrictions on distribution

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

Our audit findings

Significant audit risks		Pages 8-19
Significant audit risks	**Risk change**	**Our findings**
Valuation of post retirement benefit obligations - USS	No change	The assumptions included within the USS pension provision were optimistic but with KPMG expected ranges. See page 20.
Revenue recognition – fraud risk related to research income	No change	We have identified one control deficiency in relation to research projects regarding work in progress.
Management override of controls	No change	Our work over journals has not identified any instances of inappropriate management override of controls. We have identified one control deficiency in relation to the segregation of duties in journals controls.

Key accounting estimates		Page 20
Valuation of land and buildings	Slightly optimistic	We considered the valuation report provided by Gerald Eve, management expert, and market indices. We found the assumptions to be balanced.
USS pension liability	In progress	We involved KPMG actuarial specialists in reviewing the actuarial assumptions. Assumptions were found to be optimistic but with KPMG expected ranges.

Uncorrected audit misstatements	Pages 33-34	
Understatement/ (overstatement)	**£m**	**%**
Income	0.0	0.0
Surplus (deficit)	0.0	0.0
Total assets	0.0	0.0
Reserves	0.0	0.0

Misstatements in respect of disclosures	Pages 33-34
Misstatement in respect of disclosures	**Our findings**
Our work reviewing the disclosures of the College is ongoing at the date of this report.	N/A

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Our audit findings (cont.)

Number of control deficiencies	Pages 29-32

Significant control deficiencies	0
Other control deficiencies	5
Prior year control deficiencies remediated	1

Outstanding matters

Our audit is substantially complete except for the following deliverable(s)

- Work over areas of significant risk are complete, except for a small number of questions in research income testing.

- Work over staff costs controls and sample testing of staff costs where a small number of queries are outstanding along with a small number of investment confirmations.

- Review of plausible downside scenarios to assess the going concern status of the College.

- Final review of some areas of audit work by Manager and Partner.

- Management representation letter

- Finalise audit report and sign

Document Classification: KPMG Confidential

Significant risks and Other audit risks

We discussed the significant risks which had the greatest impact on our audit with you when we were planning our audit.

Our risk assessment draws upon our historic knowledge of the business, the industry and the wider economic environment in which the University operates.

We also use our regular meetings with senior management to update our understanding and take input from local audit teams and internal audit reports.

See the following pages for the cross-referenced risks identified on this page
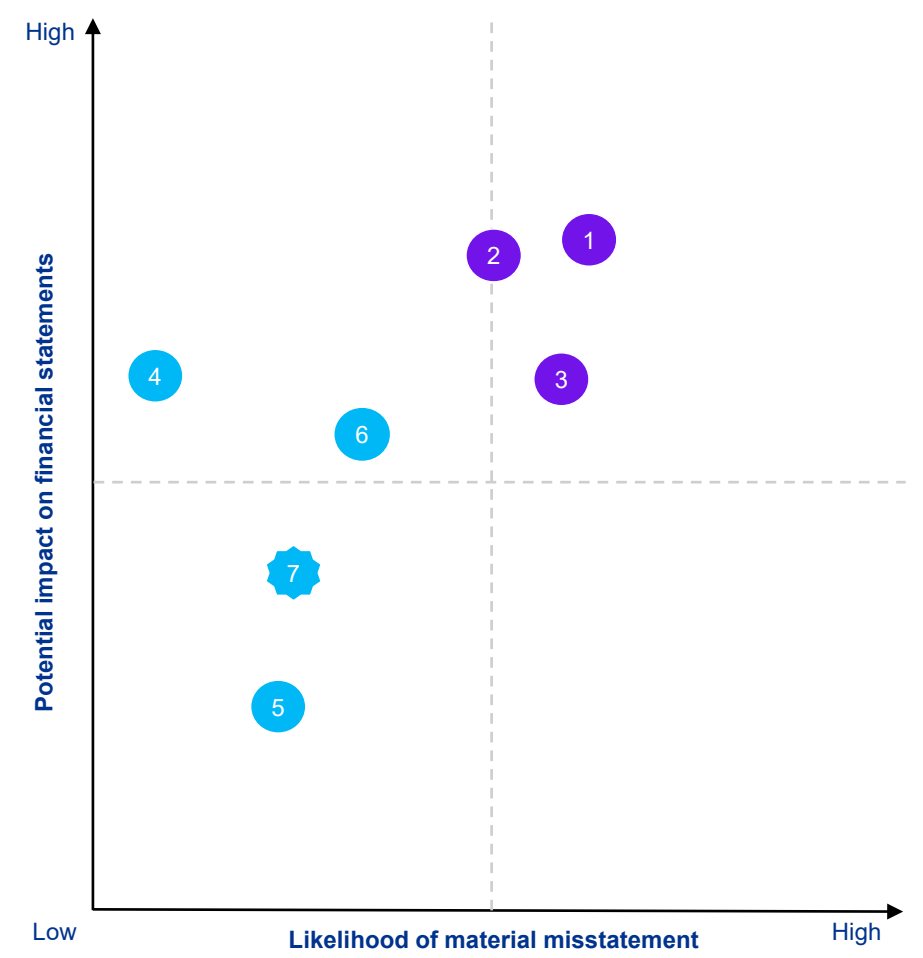
Significant risks

1. Valuation of post retirement benefit obligations - USS

2. Revenue recognition – fraud risk related to research income

3. Management override of controls

Other audit risks

4. Going concern

5. Use of funds

6. Valuation of land and buildings

7. Climate risk

Key:

\# Significant financial statement audit risks

\# Other audit risk

Increasing or decreasing risk compared with planning

\# New significant audit risk/other audit risk

Audit risks

1 ## Valuation of post-retirement benefit obligations - USS

Risk of error in relation to the valuation of post-retirement benefit obligations

Cautious   Neutral   Optimistic

Significant audit risk

An inappropriate amount is estimated and recorded for the defined benefit obligation.

- 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 University's obligation to fund deficit payments.

- The USS pension liability at 31 July 2022 was £405.3 million. This was based on the valuation set out by the USS review panel at the time. (SAUL and NHSPS are shown as nil on the College's balance sheet due to the nature of the schemes).

Our response

- Challenged and documented that the facts and circumstances still support defined contribution accounting for entities participating in the USS;

- Critically assessed the model developed to support the College in calculating the provision to be recognised to confirm that it contains an appropriate methodology to calculate an accurate provision;

- Agreed that the model has been appropriately completed by the College in preparing the calculation of the provision;

- Critically assessed the design and implementation of controls in place for management to review the model and the appropriateness of assumptions used;

- Critically assessed the actuarial assumption relating to the discount rate for the USS Pension Scheme deficit recovery plan using KPMG actuaries and considered the reasonableness of this and its sensitivity to changes in this rate;

- Challenged the salary growth and staff changes assumptions were reasonable long-term best estimates for the relevant staff, with reference to agreed pay spines and/or the entity's future business plans, externally corroborating information, our wider sector understanding and undertaking benchmarking within our audit entities;

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

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

- Inspected the accounts to ensure appropriate disclosure and reviewed the accounting treatment for annual pension charges through the Statement of Comprehensive Income.

Key: ⬭ **Prior year** ▮ **Current year**

Document Classification: KPMG Confidential | 8

Audit risks (cont.)

1 Valuation of post-retirement benefit obligations - USS

Risk of error in relation to the valuation of post-retirement benefit obligations

Significant audit risk

An inappropriate amount is estimated and recorded for the defined benefit obligation.

- 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 £405.3 million. This was based on the valuation set out by the USS review panel at the time. (SAUL and NHSPS are shown as nil on the College's balance sheet due to the nature of the schemes).

Our findings

We have reviewed the assumptions underlying the pension provision for appropriateness, and confirmed that the USS model has been appropriately applied by Kings. We have identified that the discount rate assumption, as provided by Mercer, is optimistic but within the expected range as set by KPMG actuarial specialists.

Key: ⬭ Prior year ⬬ Current year

Audit risks (cont.)

(2) Revenue recognition

Fraud risk related to misstatement of Research Income

⚠ Significant audit risk

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

Professional standards require us to make a rebuttable presumption that the fraud risk from revenue recognition is a significant risk.

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.

⚙ Our response

- 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 were apportioned in accordance with the contract terms.

- Performed a reconciliation of both research expenditure to research income, as well as movements in research debtors and creditors (driven by income recognised in year). For a sample of income considered as part of movements in debtors and creditors, we agreed to actual cash receipts.

- Tested a sample of research projects 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 (and in turn identify any instances of non-compliance).

- Reviewed new research activity by funder and specifically considered any grants with non-standard terms and conditions to assess whether the activities met the definition of research for finance reporting purposes and that projects were accounted for in accordance with the requirements of the FEHE SORP.

- Critically assessed research project data to identify projects with income, expenditure, debtor or creditor balances meeting certain criteria (such as value changed significantly year on year, length of project extended, start and end dates changed) 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.

- Performed substantive audit procedures over accrued and deferred income related to research grants and contracts.

Audit risks (cont.)

2 ## Revenue recognition

Fraud risk related to misstatement of Research Income

Significant audit risk

We consider there to be a significant risk of fraud in the recognition of research revenue largely due to inappropriate apportionment of overhead costs. The College 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.

Our findings

- The research work in progress (WIP) balance included 178 projects with no movement in the year, totalling £2.3m. Whilst this is not material there is a risk that this is not recoverable, and we have identified a control recommendation to review these projects.

Audit risks (cont.)

3 Management override of controls(a)

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

Significant audit risk

- Professional standards require us to communicate the fraud risk from management override of controls as significant.

- Management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.

- We have not identified any specific additional risks of management override relating to this audit.

Our response

Our audit methodology incorporates the risk of management override as a default significant risk.

Evaluated the design and implementation of controls in place over journal entries and post-closing adjustments.

Substantively tested identified high-risk journals to supporting evidence. In addition, we substantively tested all material post-closing adjustments.

Assessed the appropriateness of changes compared to the prior year to the methods and underlying assumptions used to prepare accounting estimates.

Assessed the appropriateness of the accounting for significant transactions that are outside the College's business or are otherwise unusual.

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 were appropriately disclosed within the financial statements.

Searched for fraudulent journal entries using KPMG Clara automated journal entry analysis.

Note: (a) Significant risk that professional standards require us to assess in all cases.

Audit risks (cont.)

③ Management override of controls[(a)]

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

Significant audit risk

- Professional standards require us to communicate the fraud risk from management override of controls as significant.

- Management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.

- We have not identified any specific additional risks of management override relating to this audit.

Our findings

- We found the design and implementation of controls in relation to journal entries and post-closing adjustments to be effective. Management have introduced a monthly review of manual journals meeting a set of criteria in line with our recommendation in the prior year. (See page 32).

- We identified 29 journal entries and other adjustments meeting our high-risk criteria – our examination. We have not identified any inappropriate journals posted or any inappropriate management override of controls within our sample test.

- We evaluated accounting estimates, including the consideration of the valuation report from management expert Gerald Eve, and did not identify any indicators of management bias. See slide 24 for further discussion.

- We did not identify any significant unusual transactions.

Note: (a)   Significant risk that professional standards require us to assess in all cases.

Key: ⬭ **Prior year**   ⬮ **Current year**

Audit risks (cont.)

4 ## Going Concern

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

Other audit risk

- Management's assessment of the entity's ability to continue as a going concern involves significant judgment with respect to student enrolments, particularly international students.
- Inflation, interest rates, development cost increases and increased cost of living may cast significant doubt on the entity's ability to continue as a going concern and may indicate the existence of a material uncertainty.
- There is a risk that disclosures in the financial statements and the annual report are not adequate with regard to the effect of risks on the entity's financial position, performance, business model and strategy.

Our response

- Evaluated how management's risk assessment process identified 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 used in its assessment, including use of the work of specialists, and evaluated how the information system captured events and conditions that may cast significant doubt on ability to continue as a going concern.
- Evaluated whether management's assessment had failed to identify events or conditions that may cast significant doubt on going concern and whether the method used by management was 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 on the business.
- Evaluated whether sufficient and appropriate audit evidence has been obtained to conclude whether a material uncertainty exits and the appropriateness of management's use (or otherwise) of the going concern basis of accounting.
- Evaluated whether there is adequate support for the assumptions underlying management's assessment, whether they are realistic and achievable and consistent with the external and/or internal environment and other matters identified in the audit.
- Challenged management's plans for future actions, and verified the reliability and relevance of data used. Determined whether the outcome of these plans is likely to improve the situation and whether management's plans are feasible.

Audit risks (cont.)

4 Going Concern

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

Other audit risk

- [Management's assessment of the entity's ability to continue as a going concern involves significant judgment with respect to [insert reason]/ [UK/International student recruitment].

- [[Rising borrowing costs]/[government policy on higher education funding and fees]/[significant reliance on fees from international students]/[the Russia/Ukraine conflict]/[Uncertainty in the UK economy and FX impact] [cost of energy/inflation][other events or conditions] may cast significant doubt on the entity's ability to continue as a going concern and may indicate the existence of a material uncertainty.]

- [Management's assessment of the entity's ability to continue as a going concern does not appropriately consider the anticipated impact of the [rising borrowing costs]/[government policy on higher education funding and fees]/[significant reliance on fees from international students]/ [the Russia/Ukraine conflict]/[uncertainty in the UK economy and FX impact]/[cost of energy/inflation] other events or conditions], including plausible but severe downside scenarios.]

Our findings

- Management have considered an appropriate period for going concern.

- The method used by management to identify events or conditions that may cast significant doubt on going concern is appropriate.

- Our work over the assessment of the reasonableness of management forecasts and plausible downside scenarios is ongoing.

Audit risks (cont.)

5 **Use of funds**

Other audit risk

- As in previous years we are required to issue an opinion on whether the College's use of funds provided by the OfS and UK Research and Innovation have been applied in accordance with the terms and conditions attached to them.

Our response

- Conducted our audit of use of funds in accordance with Practice Note 10 (revised) Audit of financial statements of public sector entities in the United Kingdom, issued by the Auditing Practices Board.

- Obtained a sufficient understanding of the framework under which the College operates, and tested compliance. In particular this means gaining assurance that income and expenditure transactions are in accordance with appropriate authorities, including those of OfS, and that the accounting presentation and disclosure conforms to applicable statutory and other requirements.

- Utilised our internally developed use of funds audit programme to ensure compliance with OfS requirements, and in addition our testing of controls and substantive items of expenditure will ascertain whether in all material respects funds have been used for the purposes given (including donations and all sources of grant funding).

Our findings

Audit risks (cont.)

6   Valuation of land and buildings

Other audit risk

- The College adopts a revaluation policy in relation to freehold land. Valuations are inherently judgemental. However, the revaluation covers both the value of land and buildings at the College. There is a risk that the methodology, assumptions and underlying data, are not appropriate or correctly applied.
- The value of the College's freehold land at 31 July 2023 was £527.0m.
- The last full revaluation took place as at July 2020. The College appointed an external valuer to perform a desktop exercise as at 31 July 2023. The College also continues to have a significant capital expenditure programme.

Our response

- Critically assessed the independence, objectivity and expertise of the external valuer appointed by the College to develop the valuation of freehold land and buildings as at 31 July 2023;
- Inspected the instructions issued to the valuers for the valuation of land and buildings to verify that they are appropriate to produce a valuation consistent with the requirements of the SORP;
- Compared the accuracy of the data provided to the valuers for the development of the valuation to the previous valuation and challenged management where variances were identified;
- Critically assessed the design and implementation of controls in place for management to review the valuation and the appropriateness of assumptions used;
- Considered the carrying value of the land, including any material movements from the previous revaluations. We challenged key assumptions within the valuation, including the use of relevant indices and assumptions, as part of our judgement;
- Performed inquiries of the valuers in order to verify the methodology that was used in preparing the valuation and whether it was consistent with the requirements of the RICS Red Book and the SORP;
- Agreed the calculations performed of the movements in value of land and verified that these had been accurately accounted for in line with the requirements of the SORP;
- Reviewed impairments, including management's own impairment review, and the need for any revisions to useful economicc lives or accelerated depreciation; and
- Considered the adequacy of the disclosures concerning the key judgements and degree of estimation involved in arriving at the valuation.

Audit risks (cont.)

6 Valuation of land and buildings

Other audit risk

- The College adopts a revaluation policy in relation to freehold land. Valuations are inherently judgemental. However, the revaluation covers both the value of land and buildings at the College. There is a risk that the methodology, assumptions and underlying data, are not appropriate or correctly applied.

- The value of the College's freehold land at 31 July 2022 was £578.0m.

- The last full revaluation took place as at July 2020. The College appointed an external valuer to perform a desktop exercise as at 31 July 2023. The College also continues to have a significant capital expenditure programme.

Our findings

- We held a call with the management expert, Gerald Eve, on 30 October 2023, and have understood the reasons behind the downward movement in the valuation based on market indices and that there have been no other changes in assumptions.

- We have not identified any control deficiencies in relation to the valuation or impairment review.

- We are satisfied that the valuation of freehold land is not materially misstated.

Audit risks (cont.)

7 **Impact of climate risk**

Other audit risk

- The College, like other entities, is subject to risks arising from climate change.

- In particular, the College is exposed to challenges from improving energy efficiency of properties to meet Government standards and targets as part of the transition to net zero; as well as risks arising from adverse weather events.

- There is increased interest from stakeholders and (indirectly) investors in climate risk; in particular on the financial impacts of retrofitting and improving efficiency.

- Whilst considered unlikely, with changing weather patterns there could be increased risk over time on the valuation of university assets, for instance if new flood zones were to arise where the campus is based.

- This is a new risk this year arising from changes to KPMG's audit approach, reflecting increased interest by stakeholders on the exposure of audited entities to climate related risks.

- We have identified this risk in relation to the College financial statements. We do not believe this risk is present in other members of the Group.

Our response

- In line with our standard methodology, we inquired of management to understand how the College has oversight of climate related risk, as well as what impacts there are on the College's business model.

- We have understood the expectations of the Government and regulators in terms of climate change on the College.

- We did not identify any potential risks at an account balance level based on our inquiries.

- We reviewed and critically assessed the disclosures made in the Annual Report in respect of climate risk, including assessing whether the disclosures adequately reflect the Group's identified exposure to climate risk and planned mitigations, as well as the impact of regulatory pressures in respect of climate risk.

- We have no findings to report to date in relation to climate risk.

Our findings

Key accounting estimates and management judgements– Overview

Our view of management judgement

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

Key: ⬭ Prior year ⬛ Current year

Asset/liability class	Our view of management judgement			Balance (£m)	YoY change (£m)	Our view of disclosure of judgements & estimates			Further comments
	Cautious	Neutral	Optimistic			Needs improvement	Neutral	Best practice	
Asset: Freehold Land Valuation of freehold land				528.0	(50.7)				The College includes freehold land at a revalued amount rather than 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 optimistic. The disclosure could be improved by adding descriptions of the key underlying assumptions in the valuation and additional detail about the material uncertainty in the estimate.
Expense: Depreciation Depreciation of PPE				48.4	(4.3)				The useful economic lives of assets are an estimate for the College, and impact the calculation of the annual depreciation expense. We have considered the accounting policy for depreciation is appropriate and has been applied appropriately to the population of fixed assets.
Liability: USS pension Valuation of the net pension liability.				331.0	74.3				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. We have utilised KPMG specialists in assessing the assumptions, and are satisfied that they are optimistic, but with KPMG acceptable range. The provision in the financial statements is not yet updated to take account of the March 2023 Fund valuation. This is the case across the sector and will impact the financial statements for the year ended 31 July 2024. This will see a significant reduction in the liability. However, until the consultation is concluded this will not be recorded in the financial statements.

IT Risk Assessment

Background

IT underpins many activities and processes within the College, including financial reporting.

A well-controlled IT environment, with effective governance over IT controls for relevant systems, reduces the risk that something could go wrong with the production of the financial accounts through fraud or error.

As part of our risk assessment and planning procedures for the audit, we involved members of our specialist IT Audit team to gain an understanding of the IT environment at the College and input into our overall audit risk assessment. This included an assessment of major developments, the IT organisation and governance arrangements, key policies and procedures, and cyber security arrangements.

Following the introduction of the revised ISA315 auditing standard, our IT risk assessment procedures were enhanced to meet the updated requirements.

Planned response

- We updated our understanding of how the College uses IT as part of financial reporting and related business processes and performed additional procedures to meet the revised requirements of ISA315; this included:

- Additional challenge of IT management, particularly in respect of cybersecurity matters,

- Enhancing our level of understanding of financially relevant IT systems, and

- Evaluating the formality of key IT processes supporting financially relevant systems.

Our findings

- The provision of IT within the College is a mixture of centralised and departmental provision; notably the day-to-day management of the Unit4 Business World (Agresso) financial management system is undertaken by a separate Financial Systems team.

- There are planned developments to the Business World application in November 2023. These are standard version upgrades from the application vendor Unit4.

- The audit team noted there is a risk around data backup and recovery as the IT Disaster Recover Plan / Cloud Backup is outdated. However, we have not identified a specific risk over internal control. The College have also involved external consultants and are implementing the findings from their report regarding Incident and Problem Managers and Business Continuity best practice.

- Our evaluation of IT processes was focused upon the following key financially relevant systems:

System	Purpose	IT Process Formality
Unit4 Business World	General Ledger, AP, AR, HR & Payroll	Formal
SITS	Student Records/Fee Income	Informal (Joiners and Leavers)
		Formal (Passwords, program change)
People XD	HR & Payroll	Formal

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Significant audit misstatements

Management has approved the correction of the audit misstatements detailed on page 34 and they are reflected in the draft financial statements. A summary of the uncorrected audit misstatements is detailed on page 33.

The misstatements identified, and their estimated financial impact on the surplus/(deficit), are summarised in the table on the right.

In line with ISA (UK) 450 we request that you correct uncorrected misstatements.

- If the uncorrected factual audit misstatements were posted, they would not impact the surplus.

- For our views on management estimates – see page 20 (Key accounting estimates)

- A detailed summary of corrected and uncorrected audit misstatements and omissions and errors in disclosure is included in the appendix.

Audit misstatements – Surplus before tax

	Type	£m	Comment
Trial balance		129.3	
Corrected misstatements			
Tuition fee debtors reclassification	Factual	0.0	This is a balance sheet reclassification of £1.6m so has not impact on the surplus of the College.
Reported in FS		129.3	
Uncorrected misstatements			
		0.0	We have not identified any uncorrected misstatements at the date of this report.
Our assessment		129.3	

Disclosure

Matter	IAS/IFRS ref	Comment

Our work over the disclosures of the College is ongoing. However, we do not have any findings to report at this date.

Types of misstatement

Factual: Misstatements about which there is no doubt

Projected: Our best estimate of misstatements in the audited populations

Judgemental: Differences arising from judgments of management that we consider unreasonable or inappropriate

Our findings on other matters relevant to the entity

Annual report

We have not yet completed our work over the annual report disclosures.

Matters on which we are required to report by exception

Access and Participation

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

We have nothing to report in these respects

Grant and Fee income

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

We have nothing to report in these respects.

Audit Fees

Our fee for the audit for the year ended 31 July 2023 was £126k plus VAT (£152k in 2021/22).

We have also completed non audit work at the Group during the year on corporation tax, US loans and an NCTL grant and have included in appendix 4 confirmation of safeguards that have been put in place to preserve our independence.

Independence and Objectivity

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

Use of funds

As the College 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 inspected the College's correspondence with the Office for Students during the year. We inspected the reports produced by internal audit during the year to consider whether there were any matters raised that may demonstrate funds were not used appropriately. We confirmed that there are appropriate policies and procedures in place, including provision of whistleblowing and anti-fraud and bribery requirements. We considered 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.	We assessed whether there were appropriate controls in place for the management of expenditure, including findings from our payroll and non-pay expenditure work. See appendix 2 for details of our control findings in relation to payroll. 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: • Inspection of significant expenditure such as capital projects or acquisitions and disposals of operations; • We did not identify any significant unusual transactions; • We did not identify any frauds or suspected frauds; • Inspection of redundancy payments. We critically assessed 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.

Group and subsidiary audits

We subjected one of the group's reporting components to a full scope audit. This is King's College London.   The component within the scope of our work accounted for 99.95% of surplus before tax.

The audit of the remaining three subsidiaries are being completed by the KPMG external audit team, but are out of scope for the Group audit.

Component Name	Areas of audit risk							Site visit	Review of work papers	Status calls	Significant matters
	1	2	3	4	5	6	7				
King's College London	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	The College is the largest component and compromises the vast majority of the Group financial statements. All of the risks identified in this report are applicable to the College, which has been subject to a full scope audit by the external audit team.
College Facilities Limited			✓								This component is out of scope for the Group audit. The KPMG audit team have performed a separate audit over the financial statements, for the audit of College Facilities only.
King's Talent Bank Limited			✓								This component is out of scope for the Group audit. The KPMG audit team have performed a separate audit over the financial statements, for the audit of King's Talent Bank only.
King's College London Business			✓								This component is out of scope for the Group audit. The KPMG audit team have performed a separate audit over the financial statements, for the audit of King's College London Business only.

Group and subsidiary audits

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

- King's College London

- College Facilities Limited

- King's Talent Bank Limited

- King's College London Business Limited

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 6 June 2023 we recognised significant risks relating to management override of controls only.

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

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

- College Facilities Limited – £200k (Plan £145k)

- King's Talent Bank Limited – £350k (Plan £350k)

- King's College London Business Limited – £373k (Plan £297k)

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.

Appendix A

Contents

Appendix one

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 July 2023.
Adjusted audit differences	OK	There was one adjusted audit difference. See page 34.
Unadjusted audit differences	OK	The aggregated profit impact of unadjusted audit differences would be £nil. In line with ISA 450 we request that you adjust for these items. However, they will have no effect on the opinion in the auditor's report, individually or in aggregate. See page 33.
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 on 31 October 2023.
Actual or suspected fraud, noncompliance with laws or regulations or illegal acts	OK	No actual or suspected fraud involving Kin's College London management, employees with significant roles in group-wide internal control, or where fraud results in a material misstatement in the financial statements identified during the audit.

Type		Response
Significant difficulties	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		We have not completed our review of the Annual Report
Breaches of independence	OK	No matters to report. The engagement team and others in the firm, as appropriate, the firm and, when applicable, KPMG member firms] have complied with relevant ethical requirements regarding independence.
Accounting practices		Our work to evaluate the appropriateness of the Group's accounting policies, accounting estimates and financial statement disclosures is in progress.
Significant matters discussed or subject to correspondence with management	OK	The were no significant matters arising from the audit.

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
1	❷	**Research Income – work in progress** The research work in progress (WIP) balance included 178 projects with no movement in the year, totalling £2.3m. There is a risk that the WIP is related to old projects with no prospect of future income or receipts, so is not recoverable. The College hold monthly meetings to provide updates on ongoing projects, which would include projects with long term outstanding WIP. We recommend the College perform a documented exercise to review these older balances for recoverability, alongside the research team, and make appropriate closures or adjustments to older projects.	The Financial Account team & RMID will undertake work during the year to 31 July 2024 to review the research WIP balances which have not moved since 1 August 2022. The findings will be documented and any adjustments put through the system where necessary.
2	❷	**Staff costs – unsigned contracts** We performed sample testing of staff costs in year. As part of this test we request signed contracts to support confirmation that the employee exists and is in employment with King's. When testing the sample there were instances where the College were unable to provide a signed contract. The requirement for a new member of staff to upload their signed contract to the People XD system is mandated for all staff and is given in the terms and conditions of employment. We recommend that a control to confirm this has been done by the HR/Payroll department within one week of joining King's is introduced.	TBC

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
3	❷	**Property, Plant & Equipment (PPE) – additions** For one item in our sample of additions to tangible and intangible fixed assets, the information to support the addition was not retained on Business World. The addition related to an MRI scanner and of value £276,030 .There is a risk that documentation for capitalisation of assets is lost when there is turnover in staff within the finance and estates teams. We recommend a policy is introduced to attach supporting documents for capitalisation of assets to Business World alongside the fixed asset register and general ledger transactions. This could include evidence of purchase such as invoices and related correspondence.	The Financial Accounts team will be reviewing the current process for capitalising additions to tangible and intangible assets going forward. For this particular item there was backing documentation attached to the journal in Business World in the form of an email chain, however we will explore a way of retaining more meaningful documentation in the system.
4	❷	**IT – Disaster Recovery Plan/Cloud Backup Policy** When completing audit procedures to understand IT processes in place at the College it was identified that the IT Disaster Recovery Plan/Cloud Backup Policy was out of date. The outdated policy may present a risk to internal control. This was mitigated in year by the policy not requiring use, We recommend that the policy is reviewed and updated to reflect current processes at the College.	TBC

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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
5	❸	**Related Parties Disclosures** To College applies a de minimis threshold to disclosed related party transactions. We recommend that this threshold is removed, so that all related party transactions are disclosed in the financial statements.	We will ensure there is no de minimis threshold applied in 2023/24.

Appendix two

Recommendations raised and followed up (cont.)

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

Total number of recommendations	Number of recommendations implemented	Number outstanding (repeated below):
2	1	1

#	Risk	Issue, Impact and Recommendation	Management Response/Officer/Due Date	Current Status (November 2023)
1	②	**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 recognised 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. 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.	**Partially implemented** In the year management have introduced a retrospective risk based monthly control including a monthly download of manual transactions from Business World (general ledger) and reviewed all items over £800k, all journals posted on weekends, and a random sample of journals between £100k and £800k in value. However the control implemented is not a sufficient control for audit reliance.
2	③	**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 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.	**Implemented** Our review of bank reconciliations in the current year did not identify a control finding in relation to timely review.

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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 we request that you correct uncorrected misstatements. However, they will have no effect on the opinion in our auditor's report, individually or in aggregate. As communicated previously with the Audit, Risk and Compliance Committee, details of all adjustments greater than £1.2m are shown below:

Unadjusted audit differences (£'000s)			
No.	Detail	SOCI Dr/(cr)	SOFP Dr/(cr)	Comments
				We have not identified any unadjusted audit differences at the date of this report.
Total		£-	£-	

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Appendix three

Audit Differences (cont.)

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

Adjusted audit differences (£'000s)				
No.	Detail	SOCI Dr/(cr)	SOFP Dr/(cr)	Comments
1	Dr Other debtors	£-	£1,600	Due to an error in an excel formula within management workings for tuition fee debtors, the year-end adjustment to move credit balances from the tuition fee debtors schedule to deferred tuition income was incorrectly calculated.
	Cr Deferred income – tuition fees	£-	(£1,600)	
				The adjustment corrected the calculation in the error, and is a reclassification between categories on the balance sheet.
Total		£-	£-	

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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 final 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 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 in the following table

Description of scope	Threats to independence	Safeguards applied	Value of service and basis of fee
Corporation tax	Self-Review threats would arise where our corporation tax work is relied upon during our audit procedures.	The service will be provided by KPMG professionals who are not members of the audit team. Management are to provide any inputs into calculations and will provided significant oversight during the performance of the service.	£25,220 The fee includes the preparation of corporation tax returns and the statutory iXBRL return. The fees have not changed significantly from the prior year.

Confirmation of Independence (cont.)

Description of scope	Threats to independence	Safeguards applied	Value of service and basis of fee
Corporation tax	Self-Review threats would arise where our corporation tax work is relied upon during our audit procedures.	Tax affairs of the entity are not complex. Services are of a technical, mechanical or informative nature only.	£25,220 The fee includes the preparation of corporation tax returns and the statutory iXBRL return. The fees have not changed significantly from the prior year.
	Advocacy threats arise where providing these services would require the firm to act as an advocate for the audited entity in relation to matters that are material to the financial statements.	Any report will be addressed solely to the client and distribution to third parties (other than regulators and others who have statutory rights of access) will be restricted. KPMG will not be representing the client before any third parties.	
	A management threat may arise where the tax team provide services that are perceived to make management judgements.	Standard language on non-assumption of management responsibilities is included in any engagement letters. KPMG will provide a range of recommendations only and will not make decisions.	

Description of scope	Threats to independence	Safeguards applied	Value of service and basis of fee
US Loans	Self-review threats would arise where our work on US Loans was relied upon during our audit.	The US Loans audit is completed after the financial statements opinion is signed.	£12,250 The fee has been increased to reflect RPI for 2023 and reflects the hours required to complete the audit procedures.
NCTL	Self-review threats would arise where our work on the NCTL grant was relied upon during our audit.	The NCTL grant audit is completed after the financial statements opinion is signed.	£5,000 The fee has been increased to reflect RPI for 2023 and reflects the hours required to complete the audit procedures.

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Appendix five

FRC's areas of focus

The FRC released their Annual Review of Corporate Reporting 2021/22 in October 2022, along with a summary of key matters for the coming year, primarily targeted at CEOs, CFOs and Audit (and Risk) Committee chairs. In addition, they have released six thematic reviews during the year which should be considered when preparing reporting for the current financial period.

The reports identify where the FRC believes companies 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 group.

Reporting in uncertain times

This year's Annual Review of Corporate Reporting from the FRC has been prepared in the context of heightened economic and geopolitical uncertainty. The challenges of the Covid-19 pandemic, Russia's invasion of Ukraine and slowing of global economies has led to inflationary pressure worldwide and rising interest rates.

This makes meaningful disclosure more important than ever, and the FRC has stressed the need for companies to move beyond simply complying with the minimum requirements of the relevant accounting and reporting frameworks. They expect companies to provide high-quality, decision-useful information for investors, with companies continually assessing evolving risks and ensuring these are clearly explained in annual reports.

The potential effects of uncertainty on recognition, measurement and disclosure are numerous, and companies will need to think carefully about the impacts of uncertainty, in particular inflation, on their reporting. The Annual Review gives a number of examples including:

- **Strategic report:** the impact of inflation on the business model, changes to principal risks and uncertainties, and the impact of inflation on stakeholders.

- **Discount rates:** inputs need to follow a consistent approach in incorporating the effects of inflation.

- **Material assumptions:** where inflation assumptions represent a source of significant estimation uncertainty, the FRC expects companies to provide explanation of how these have been calculated and sensitivity disclosures if appropriate.

- **Pension schemes:** explain the effect of uncertainty on investment strategy and associated risks.

Climate-related reporting

Climate-related reporting has advanced significantly this year as premium listed entities are required by the Listing Rules to provide disclosures consistent with the Taskforce on Climate-Related Disclosures (TCFD) recommendations. This follows the expansion of the Streamlined Energy and Carbon Reporting (SECR) rules last year, which require quoted companies and large unquoted companies and LLPs to provide emissions reporting.

Climate has therefore been an area of ongoing focus for the FRC, with a thematic reviews in both 2021 and 2022 on aspects of climate reporting. From reviews of TCFD disclosures in the year, the FRC has highlighted five areas of improvement for companies to consider going forwards:

- **Granularity and specificity:** disclosures should be granular and specific both to the College and the individual disclosure requirement, including a clear link to financial planning.

- **Balance:** discussion of climate-related risks and opportunities should be balanced, and companies should consider any technological dependencies.

- **Interlinkage with other narrative disclosures:** companies should ensure clear links between TCFD disclosures with other narrative disclosures in the annual report.

- **Materiality:** companies should clearly articulate how they have considered materiality in the context of their TCFD disclosures.

- **Connectivity between TCFD and financial statements disclosures:** the FRC may challenge those that disclose significant climate risks or net zero transition plans in narrative reporting, but do not explain how this is taken into account in the financial statements.

Appendix five

FRC's areas of focus (cont.)

Cash flow statements

This continues to be a particular area of concern as it is a recurring source of errors identified by the FRC, with 15 companies restating their cash flow statements in the review period as a result of the FRC's enquiries.

Companies are encouraged to consider the guidance in the 2020 thematic review on this topic, and to ensure that robust pre-issuance reviews of the financial statements have been undertaken.

Cash flows must be classified as operating, investing or reporting in line with the requirements of the standard, and amounts reported should be consistent with disclosures elsewhere in the report and accounts including the elimination of non-cash transactions.

Several errors identified by the FRC related to the parent College cash flow statement, and it should ensure that this statement also complies with the requirements of the standard.

Financial Instruments

Companies should ensure that disclosure is sufficient to enable users to evaluate the nature and extent of risks arising from financial instruments and the approach taken to risk management.

These disclosures should include the approach and assumptions used in the measurement of expected credit losses, and details of concentrations of risk. In times of economic uncertainty, disclosure of methods used to measure exposure to risks, and details of hedging arrangements put in place for interest rates or inflation are all the more important.

In addition, accounting policies should be provided for all material financing and hedging arrangements and any changes in these arrangements. Where companies have banking covenants, information about these should be provided (unless the likelihood of a breach is considered remote).

Income taxes

Where material deferred tax assets are recognised by historically loss-making entities, disclosures should explain the nature of the evidence supporting their recognition. In addition, any connected significant accounting judgements or sources of estimation uncertainty will also need to be disclosed.

On tax more generally, the FRC expects companies to ensure that tax-related disclosures are consistent throughout the annual report and accounts, and material reconciling items in the effective tax rate reconciliation are adequately explained.

For groups operating in several jurisdictions, effective tax reconciliations may be more meaningful if they aggregate reconciliations prepared using the domestic rate in each individual jurisdiction, with a weighted average tax rate applied to accounting profit.

Strategic report and other Companies Act 2006 matters

The strategic report needs to articulate the effects of economic and other risks facing companies, including inflation, rising interest rates, supply chain issues and labour relations. Mitigation strategies should be explained, with links, where relevant, to information disclosed elsewhere in the annual report.

Business reviews should discuss significant movements in the balance sheet and cash flow statement and should not be limited to just an explanation of financial performance in the period.

The FRC has also identified instances of companies not complying with legal requirements around distributions, and companies are reminded of the need to file interim accounts to support distributions in excess of the distributable profits shown in the relevant accounts.

Revenue

Accounting policies should be provided for all significant performance obligations and should address the timing of revenue recognition, the basis for over-time recognition, and the methodology applied.

Inflationary features in contracts with customers and suppliers and the accounting for such clauses are under increased focus this year.

Alternative performance measures ('APMs')

APMs should not be presented with more prominence, emphasis or authority than measures stemming directly from the financial statements and should be reconciled to the relevant financial statements line item.

Appendix five

FRC's areas of focus (cont.)

Provisions and contingencies

Companies should give clear and specific descriptions of the nature and uncertainties for material provisions or contingent liabilities, the expected timeframe and the basis for estimating the probable or possible outflow.

Inputs used in measuring provisions should be consistent in the approach to incorporating the effects of inflation, and details of related assumptions should be provided if material.

Presentation of financial statements and related disclosures

Material accounting policy information should be clearly disclosed, and additional University-specific disclosures should be provided when compliance with IFRS requirements is insufficient to adequately explain transactions.

Judgements and estimates

Economic uncertainty increases the likelihood of companies needing to make significant judgements when preparing financial statements. The FRC highlights two specific examples – going concern assessments and accounting for inflationary features in contracts – where disclosure is key.

More generally, the FRC highlights the need for disclosures to clearly distinguish between estimates with a significant risk of a material adjustment to the carrying amounts of assets/liabilities within the next year, and other sources of estimation uncertainty.

Significant estimates, and the associated disclosures should be updated at the balance sheet date. Sensitivity disclosures should be meaningful for readers, for example, by sensitising the most relevant assumptions and explaining any changes in assumption since the previous year.

Impairment of assets

Economic uncertainty may have a significant impact on impairment assessments, and this is an area where queries raised from the FRC could have been avoided by clearer disclosure.

Companies need to explain the sensitivity of recoverable amounts to changes in assumptions, especially where the range of possible outcomes has widened. This should include explanation of the effect of economic assumptions, such as reduction in customer demand and increased cost.

Inflation should be treated consistently in value in use calculations. Nominal cash flows are discounted at a nominal rate, and real cash flows are discounted at a real rate.

Lastly, the FRC stresses the importance of consistency between impairment reviews/disclosures and other disclosures in the annual report.

Thematic reviews

The FRC has released six thematic reviews on corporate reporting in the current year, and companies are encouraged to consider the guidance in those reviews, where relevant, to enhance their financial reporting. The topics covered this year are:

- TCFD disclosures and climate in the financial statements
- IFRS 3 Business Combinations
- Deferred Tax Assets (IAS 12)
- Judgements and estimates
- Discount rates
- Earnings per Share (IAS 33)

2022/23 review priorities

The FRC has indicated that its 2022/23 reviews will focus on the extent to which companies' disclosures address risks and uncertainty in the challenging economic environment, including those relating to climate change. Companies need to clearly articulate the impact of these risks on their strategy, business model and viability. In particular, the FRC intends to prioritise reviews of companies operating in the following sectors:

- ✈ Travel, hospitality and leisure
- 🛒 Retail
- 🏗 Construction materials
- ⚡ Gas, water and multi-utilities

KPMG's Audit quality framework

DRAFT

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.

To ensure that every partner and employee concentrates on the fundamental skills and behaviours required to deliver an appropriate and independent opinion, we have developed our global Audit Quality Framework. Responsibility for quality starts at the top through our governance structures as the UK Board is supported by the Audit Oversight Committee, and accountability is reinforced through the complete chain of command in all our teams.

Commitment to continuous improvement
- Comprehensive effective monitoring processes
- Significant investment in technology to achieve consistency and enhance audits
- Obtain feedback from key stakeholders
- Evaluate and appropriately respond to feedback and findings

Performance of effective & efficient audits
- Professional judgement and scepticism
- Direction, supervision and review
- Ongoing mentoring and on the job coaching, including the second line of defence model
- Critical assessment of audit evidence
- Appropriately supported and documented conclusions
- Insightful, open and honest two-way communications

Commitment to technical excellence & quality service delivery
- Technical training and support
- Accreditation and licensing
- Access to specialist networks
- Consultation processes
- Business understanding and industry knowledge
- Capacity to deliver valued insights
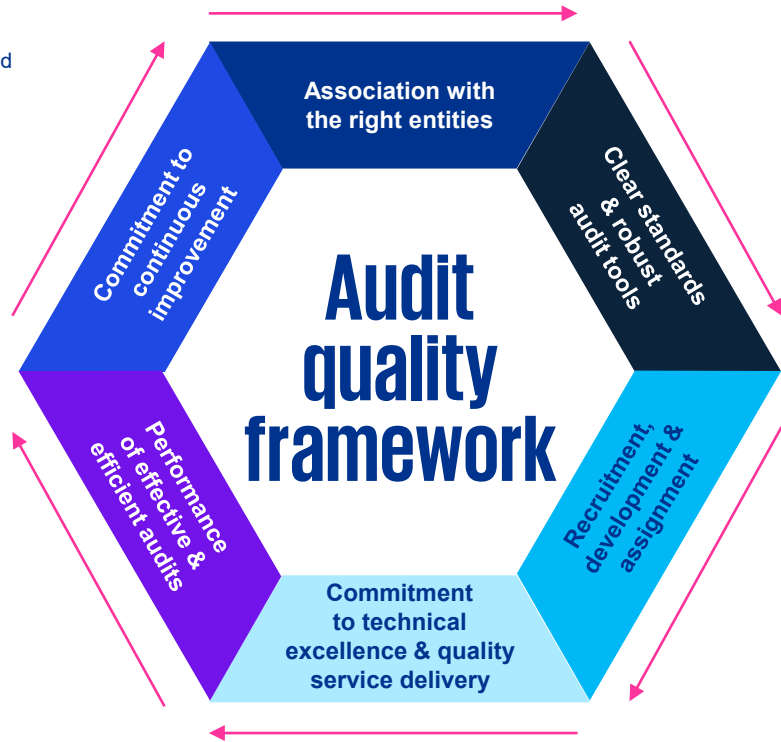
Association with the right entities
- Select clients within risk tolerance
- Manage audit responses to risk
- Robust client and engagement acceptance and continuance processes
- Client portfolio management

Clear standards & robust audit tools
- KPMG Audit and Risk Management Manuals
- Audit technology tools, templates and guidance
- KPMG Clara incorporating monitoring capabilities at engagement level
- Independence policies

Recruitment, development & assignment of appropriately qualified personnel
- Recruitment, promotion, retention
- Development of core competencies, skills and personal qualities
- Recognition and reward for quality work
- Capacity and resource management
- Assignment of team members employed KPMG specialists and specific team members

Audit quality framework

- Association with the right entities
- Clear standards & robust audit tools
- Recruitment, development & assignment
- Commitment to technical excellence & quality service delivery
- Performance of effective & efficient audits
- Commitment to continuous improvement

ISA (UK) 315 Revised: Overview

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 periods commencing on or after **15 December 2021**.

The revised standard expands on concepts in the existing standards but also introduces new risk assessment process requirements – the changes had 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 did this mean for our audit?

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

	Low — High
Effect on audit effort	
Increased professional scepticism	
Understanding the entity	
Understanding internal control	
IT systems and communication	
Control activities	
Identifying and assessing risks	
Control risk	
Stand-back assessment and documentation	
TOTAL EFFORT	

Appendix eight
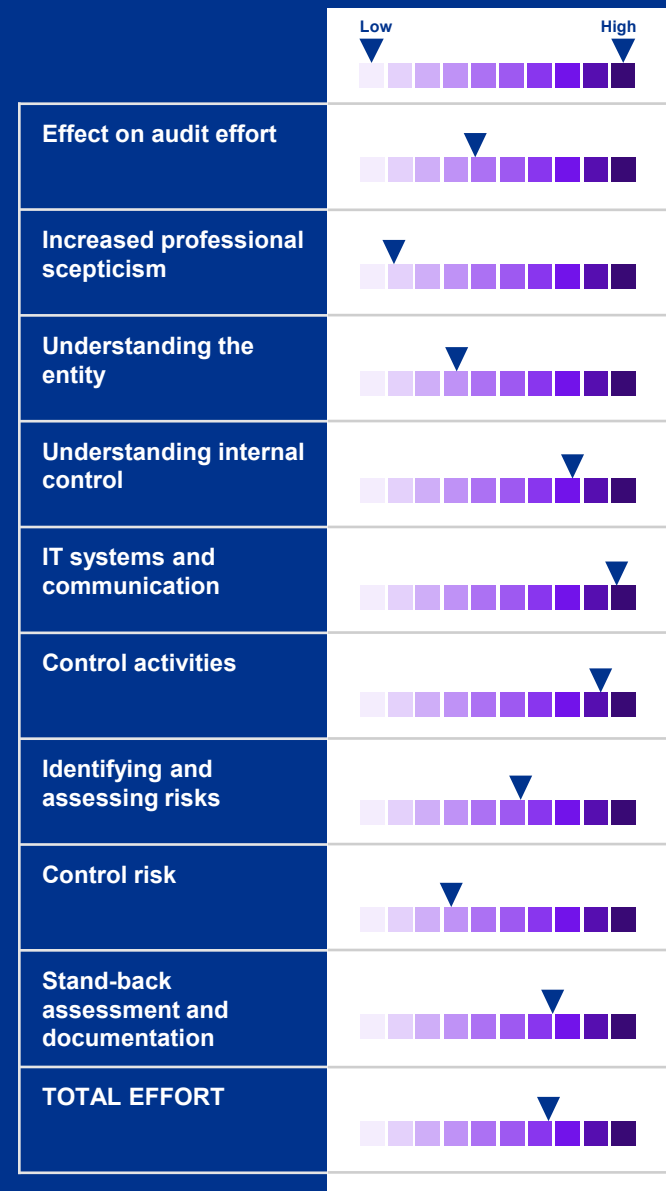
ISA (UK) 240 Revised: Summary of key changes

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 **15 December 2021**. 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 nevertheless resulted in changes to our audit approach. The table to the right summarises the main changes and our final assessment of their impact.

What did this mean for our audit?

[The changes introduced new requirements which increased 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.]

Area	Effect on audit effort	Summary of changes and impact
Risk assessment procedures and related activities		1. Increased focus on applying professional scepticism – the key areas affected are: – [explain the extent to which we obtained evidence that is corroborative in nature or our consideration of contradictory evidence] – [note how we remained alert for indications of inauthenticity in documents and records] – [note how we investigated inconsistent or implausible responses to inquiries performed]. 2. Our inquiries with individuals at the entity were expanded to include, amongst others, those who deal with allegations of fraud 3. We determined whether to involve technical specialists (including forensics) to aid in identifying and responding to risks of material misstatement due to fraud. This resulted in increased involvement of specialists and an expanded scope of work for these specialists, on our audit engagement
Internal discussions and challenge		We complied with 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		We have complied with new requirements for communicating matters related to fraud with management and those charged with governance, in addition to the reporting in our audit reports.

Appendix nine

Subsidiary audit exemption

The Companies Act allows UK groups that produce consolidated accounts to take advantage of the audit exemption for any UK subsidiaries included within the consolidated accounts provided that the parent company is willing to provide a parent company guarantee.

01

Which companies can use the subsidiary audit exemption?

UK subsidiaries which are included within UK consolidated accounts can elect to take the audit exemption, provided they do not have listed shares or debt and certain other restrictions. Please see the link below for the full listing of companies unable to take the exemption.

02

What is the impact of taking the audit exemption?

The parent company is guaranteeing the liabilities of the subsidiary that exist as at the balance sheet date for the life of the liability and careful consideration of the risks that this entails needs to be undertaken before giving the guarantee as this increases the risk to the parent company. Intermediate holding companies with no external liabilities or contingent liabilities may be the most suitable to take the exemption.

03

How do companies claim the exemption?

The consolidated accounts need to state that subsidiary X is in receipt of a parental guarantee to take advantage of the audit exemption for that year. The ICAEW Technical Release provides details of the forms to submit to Companies House to take the exemption. This process must be repeated for all subsequent years where the company wishes to make use of the exemption.

04

Audit implications

The parent company's going concern evaluation, which its auditors would then need to evaluate, would need to examine the likelihood and impact of the guarantee being called upon to settle the liabilities of the subsidiary receiving the guarantee.

05

Where can I find further guidance?

Further guidance setting out which entities are eligible and the process that needs to be taken to apply the audit exemption can be found at https://www.icaew.com/technical/technical-releases/legal/tech-0620bl-exemption-from-audit-by-parent-guarantee.

Some or all of the services described herein may not be permissible for KPMG audited entities and their affiliates or related entities.

kpmg.com/uk

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KING'S
College
LONDON

KPMG LLP
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21 November 2023

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 2023, for the purpose of expressing an opinion:

    i.   as to whether these financial statements give a true and fair view of the state of the Group's and of the University's affairs as at 31 July 2023 and of the Group's and of the University's income and expenditure, gains and losses, changes in reserves and of the Group's cash flows for the financial year then ended; 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 Consolidated and University statement of comprehensive income and expenditure, the Consolidated and univeristy statement of changes in reserves, the Consolidated and University balance sheets, Consolidated statement of cash flows and notes, comprising a summary of significant accounting policies and other explanatory notes.

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

The Council confirms 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 of the University's income and expenditure, gains and losses and changes in reserves, and of the Group's cash flows, for that financial year then ended; 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.

Information provided:

5. The Council has provided you with:

- access to all information of which it is aware, that is relevant to the preparation of the financial statements, such as records, documentation and other matters;

- additional information that you have requested from the Council for the purpose of the audit; and

- unrestricted access to persons within the Group and the University from whom you determined it necessary to obtain audit evidence.

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

7. The Council confirms the following:

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

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

   ii) The Council has disclosed to you all information in relation to:

   a) Fraud or suspected fraud that it is aware of and that affects the Group and the University and involves:
      - management;
      - employees who have significant roles in internal control; or
      - others where the fraud could have a material effect on the financial statements; and

   b) allegations of fraud, or suspected fraud, affecting the Group and the University's financial statements communicated by employees, former employees, analysts, regulators or others.

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

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

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

11. The Council has disclosed to you the identity of the Group and the University's related parties and all the related party relationships and transactions of which it is aware. All related party relationships and transactions have been appropriately accounted for and disclosed in accordance with section 33 of FRS 102.

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

12. The Council confirms that:

   a) The financial statements disclose all of the matters that are relevant to the University's and Group's ability to continue as a going concern, including key risk factors, assumptions made and uncertainties surrounding the University's and the Group's ability to continue as a going concern as required to provide a true and fair view and to comply with FRS 102.

   b) No material uncertainties related to events or conditions exist that may cast significant doubt on the ability of the University and the Group to continue as a going concern.

13. On the basis of the process established by the Council and having made appropriate enquiries, the Council is satisfied that the actuarial assumptions underlying the valuation of defined benefit obligations are consistent with its knowledge of the business and in accordance with the requirements of section 28 of FRS 102.

   The Council further confirms that:

   a) all significant retirement benefits, including any arrangements that are:

   - statutory, contractual or implicit in the employer's actions;
   - arise in the UK and the Republic of Ireland or overseas;
   - funded or unfunded; and
   - approved or unapproved,

   have been identified and properly accounted for; and

   b) all plan amendments, curtailments and settlements have been identified and properly accounted for.

14. To the best of our knowledge and belief the Group and University has complied with the requirements of the Charities Act 2011. In particular, the University has disclosed all payments made in relation to trustees' expenses and all "connected institutions and bodies" have been disclosed appropriately. Furthermore, all serious incidents, as defined under the Act, have been captured and recorded appropriately.

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

16. To the best of our knowledge and belief the Group and University has complied with the terms and conditions of any capital grant funding received during the year and in respect of other capital grant funding received in prior years. In all instances, the University is satisfied that the agreed outputs against which each project will be assessed will be delivered.

17. To the best of our knowledge and belief the Group and University has complied with the terms and conditions of any revenue grant funding (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.

18. In all material respects, funds from whatever source administered by the Group and the University for specific purposes have been applied to those purposes during the year ended 31 July 2023.

To the best of our knowledge and belief the Group and University has complied with the Office for Students (OfS) guidance for access and participation spend and any spend classified as access and participation spend is in accordance with this guidance.

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

- we are not aware of any issues or disputes associated with delivery undertaken by partners which would impact on the financial statements.

- we are of the opinion that the land and buildings included within tangible fixed assets have been valued appropriately in accordance with the requirements of FRS 102, and to the best of our knowledge and belief we are satisfied that no impairment provision is necessary in respect of the Group and University's estate.

- there are no issues arising from the finalisation of student data for the year ending 31 July 2023 which has been used to produce the University's 2023 HESA return/re-creation of HESES23 which would have a material impact on teaching funding from the Office for Students or English undergraduate fee income recognised in the financial statements.

- in all material respects the University has complied with the Office for Students and Research England terms and conditions of funding in the period from 1 August 2022 to 31 July 2023.

- to the best of its knowledge and belief the Group and University has disclosed details of all heritage assets in accordance with Section 34 of FRS 102. It confirms that all donated heritage assets have been valued appropriately in accordance with the requirements of Section 34.

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

- In our opinion, all investment properties have been valued appropriately in accordance with the requirements of FRS 102 and the carrying value is appropriate based upon professional advice, current usage and plans for future usage of these premises.

- There are no other factors affecting the valuation of investment properties that need to be reflected in the accounts to 31 July 2023 other than as disclosed to you.

This letter was tabled and agreed at the meeting of the Council on 21 November 2023.

Yours faithfully,

[Chairman]

[College Secretary]

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

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

Material Matters

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

FRS 102 states that:

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

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

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

Error

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

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

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

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

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

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

Related Party and Related Party Transaction

Related party:
A related party is a person or entity that is related to the entity that is preparing its financial statements (referred to in FRS 102 as the "reporting entity").

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

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

Section 1: King's College London Prevent Duty Report 2022/23

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 2021-22 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 2021/22 ADR was submitted to the Office for Students (OfS) in November 2022. In May 2023, 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 College's 2021/22 ADR submission.

The information below sets out the University's Prevent Duty activity in 2022/23.

Management and Governance

The Academic Regulations, Quality and Standards (ARQS) team maintains oversight of the University's Prevent Duty obligations and monitors the Prevent Duty Risk Assessment and Action Plan, works in conjunction with Student Services to organise staff training on Safeguarding and Prevent, 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 meets four times a year and monitors operational aspects of delivering the Prevent Duty as well as wider Safeguarding activities at the College.

The KCLSU President attended the Steering Group in October 2022. The Vice-President Welfare and Community is a member of the Safeguarding Oversight Group and attended the last meeting of the year in June 2023. A representative from KCLSU Advice has been in attendance at SOG throughout the year. Several opportunities to discuss the King's approach with KCLSU were offered in 2022/23, but unfortunately it was not possible to move forward with these arrangements. A meeting with the new President, VP of Welfare (who will sit on the Safeguarding Oversight Group) and any other interested elected officers has already been arranged for September 2023. Additional ways to enhance engagement with KCLSU are to be explored for 2023/24.

The internal webpages on Safeguarding and the Prevent Duty continue to be available to all staff and have been reviewed and updated as appropriate. The Prevent Duty Risk Assessment and Action Plan is monitored by ARQS and reviewed annually by the Safeguarding Oversight and Steering Groups.

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) maintains contact with this individual to provide further advice on any Prevent-related cases that arise. The Head of Academic Policy attends the London HE Prevent Networks organised by the DfE and continues to act as a HE representative on the Lambeth Prevent Advisory Group. 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. Two KCL representatives (from ARQS and Student Services)

also attended the first DfE Prevent Higher Education Conference that was held in 2023. Information on best practice has been shared following all external events with relevant colleagues.

In June 2023, the updated Counter Terrorism Local Profile for London was received, and an overview was shared with the Safeguarding Steering Group. Islamic extremism continues to be the predominant risk and threat in London. There has not been a significant increase in Extreme Right-Wing Terrorism; however, most of the activity for both types of terrorism take place online as it is so accessible. The Online Harms Bill may be reopened to address some of these issues, and updates provided by the Department for Education and the Counter-Terrorism Police will be monitored accordingly. 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.

<u>Welfare</u>

Student

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 student referrals 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 **1864** referrals through SOC for the 2022/23 academic year - an increase of 13% on the 1636 referrals received in the previous year. The increase in referrals may also be down to increased awareness and confidence from staff in using the Student of Concern Procedure.

We received 6 Student of Concern referrals noting possible risk of radicalisation, which were all assessed by the Student of Concern Management team.

With regard to 2 Student of Concern referrals, risk of radicalisation was noted as a secondary concern in addition to a number of other secondary concerns. After further conversations with the referrers, there was no evidence to suggest that there was a risk of radicalisation in either of these cases. One further case noting possible risk of radicalisation was found to be an administrative error on the part of the referrer.

Of the three remaining referrals:

- A SOC referral was made after a student had been reported to the police by an academic staff member. The report to the police was due to a concern for safety and a fear of risk of harm based on behaviour in a faculty whatsapp group and on campus. The subsequent SOC referral noted a possible risk of radicalisation in relation to misogyny and incel-related behaviour. The concerns were investigated by the police, but no formal charges have been made against this student to date and a Prevent-referral was deemed not necessary. The student was contacted by the SOC Welfare Team and provided with support.

- A referral was made by an ex-partner of a student, which included multiple concerns including risk of radicalisation. Upon discussion, there was no evidence to support a risk of radicalisation and the student was offered support by multiple teams in Student Services.

- A referral was made by a staff member about a student due to concerns about the student's behaviour and knowledge of a previous referral for risk of radicalisation. After discussion, it transpired that the student had not said anything which suggested the presence of radicalisation

and the student was offered support via Student Services and Support for Study. A discussion was had with the staff member about the appropriateness of the referral to ensure they have a better understanding on what constitutes a referral in this space.

From the cases this year, it is clear that there is a tendency to select multiple secondary concerns or conflate mental health/welfare vulnerabilities with additional secondary concerns even when there are no presenting factors as evidenced by a couple of the cases noted above. This is being considered by the Student Welfare team and the Student of Concern Management Group and will inform developments to training going forward.

We can consider how this issue might inform our Safeguarding/Prevent training going forward.

Staff

There was one serious concern relating to a staff member that was investigated by the Lead Safeguarding Officer (staff). The concern was primarily one of safeguarding but had links to IRA-related terrorism and came to light via concerns for wellbeing and welfare raised by faculty staff. The staff member was directed to support and as they were receiving external specialist and familial support, it was decided that no further external referral was necessary.

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 online platforms. Included in the training material is the behaviour barometer, which was shared by the DfE as a resource, video content on Prevent produced by the Home Office, and information on how to report terrorist-related content to the Counter-Terrorism Police via the web or the newly developed iREPORTit app. Additional information was also incorporated into face-to-face training sessions and briefings for key teams. In April and May 2023, the face-to-face training held with Senior Tutors and Security staff included a myth-busting section to tackle misunderstandings around Prevent as well as a spotlight on Incel culture. In the period 1 August 2022 to 31 July 2023, 97 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. The internal training is delivered on a 3-year basis. For 2022/23, this included:

- **3 Faculty Wellbeing and Welfare Advisors;**
- **1 Designated Safeguarding Officer;**
- **5 members of Disability Support and Inclusion;**
- **2 members of Student Welfare (SOC) Team;**
- **39 Senior Tutors;**
- **27 Residences Welfare Leads;**
- **12 members from Residences Management Team;**
- **6 members from the Security Team**
- **2 members of the Academic Regulations, Quality & Standards team who maintain oversight of the University's compliance with the Duty;**

The key team members from Disability and Inclusion, Regulatory Compliance manager in ARQS and Residences Wellbeing manager also attended sessions run by the DfE Regional Prevent Coordinator.

Positive feedback was received for the internally delivered training sessions.

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. An intranet page on the e-module provides 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 2022 to 31 July 2023, **152[1]** staff members completed the module and passed the end of module assessment (26 of these are noted as key to delivering the Duty). 12 members of staff have started and yet to complete the e-module. Positive feedback on the e-module has been received.

Work is underway to update the content to ensure accuracy, include a myth-busting section on Prevent, and move the e-module over to WorkRite. This will make the training more accessible for all staff. This is expected to be completed by September 2023.

Broader welfare and safeguarding awareness training
In October 2022, 24 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 Widening Participation Department have procedures in place to safeguard staff as they undertake activities, and to safeguard the individuals involved. 9 members of the Widening Participation team also completed the NSPCC Child Protection e-training, which forms part of the staff induction process for all new members of staff in Widening Participation.

Please note: the following training breakdown has been included in the Prevent Data return based on staff who are identified as key to delivering the duty as well as if they have completed refresher training/induction training this year:
- 92 key staff received induction training (26 via e-module; 66 via f2f training)
- 31 received refresher training (all via f2f training)
- 159 staff received broader safeguarding training (126 via e-module; 33 Widening Participation staff via external training)

External Speakers

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. The policy on external speakers for all bookings , including those for faculty and departmental spaces can be found here External Speakers Policy and whilst Prevent is not referred to explicitly it comes under the regulatory responsibilities referred to in the document. The student bookings team will receive a refresher training in the current legislation and this will also incorporate a link to it in the External Speakers policy.

There were 1429 events/speakers approved through the external speaker process in 2022/23. Eight events were approved subject to additional mitigations or conditions. Of these eight events that were risk assessed two were low risk, five medium risk, and one high risk. No events/speakers were rejected. There were no events with Prevent-related risks that required additional mitigations or conditions.

The mitigations that were put in place for the risk-assessed events included ticketing events, recording events (so that the College had an unbiased record), safe space recognition, and reminders and presence of

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[1] In total, 204 members of staff completed the e-module. However, 52 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

a Duty Dean (for high/ medium risk events). The practice of recording events was questioned as to its legality and, on reflection, the FESAG Operations group have since dropped this as a workable mitigation for all but a high-risk option. The King's Venues team have further evolved their approach to risk assessed events and now prepare a security plan/evaluation for each and will continue to do this. The pool of available Duty Deans is constantly updated and reviewed and the way this role is communicated to student groups has been honed. An internal audit also took place this academic year, reviewing the mitigations and processes for external speakers. It was deemed that the University has appropriate measures in place to mitigate Prevent-related risks, whilst enabling free speech.

During the year, it was identified that the King's Venues had a different record to KCLSU of events in 2022/23. To avoid this in the future, King's Venues have added a check box to all student bookings with External Speakers (both ratified and non-ratified) to consider any affiliations that may give rise to/cause for concern so these can be collated more easily for end of year reporting. This is now on the spreadsheet that is used to track all student bookings with external speakers. A risk was also identified by the Freedom of Expression Standing Advisory Group in 2022/23 in that the College needs to work on training those involved in organising external speakers to be mindful of events inviting or promoting proscribed organisations with geo-political issues that could become a Prevent issue. An additional check for proscribed groups has been added to the KCL speaker check spreadsheet produced by King's Venues, which is used to assess all external speaker events. This will also be added to the institutional Prevent Risk Assessment for 2023/24 to monitor the implementation of training and a review of KCLSU's External Speakers Policy and Safe Space Policy will also be taking place in 2023/24.

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.

Service Desk Analysts are aware of what to do if they are notified of the receipt of a potential Prevent-related email. 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. As of March 2023, all departments agreed to implement the procedure and handle these issues centrally.

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.

Academic Regulations, Quality & Standards

Section 2: Data Return 2022/23 (to be submitted to the Office for Students)

As per the latest guidance from the Office for Students on the annual Prevent Data Return, the following changes have been made to the required submission:

- The data on number of staff receiving broader welfare/safeguarding awareness training/briefing is no longer required.
- An accompanying text statement about staff training is no longer required.

Welfare					
Question	Islamist radicalisation	Extreme right-wing radicalisation	Mixed, unstable or unclear ideology	Other radicalisation	Total
a) Number of Prevent-related cases escalated to the point at which the Prevent lead has become involved	0	0	0	0	0
b) Number of Prevent-related cases which led to informal external advice being sought from Prevent partners	0	0	0	0	0
c) 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 who might be at risk of radicalisation.

We received 6 referrals via the SOC procedure which included concerns about risk of radicalisation. From initial investigations, 3 of these cases were found to be administrative error. For the remaining 3 student cases, 1 presented with an incel-related/misogyny ideology and the other 2 cases were considered as mixed/unstable/unclear ideology. All 3 cases were investigated by the Student of Concern Management Team. None of these cases were escalated to the Prevent Lead.

For two of the cases, upon further investigation, there were no grounds for concern and alternative forms of support were put in place.

The third case was referred to the SOC team retrospectively after a report had already been made to the police by a member of staff around concerns for safety/risk of harm. The concerns were investigated by the police, but no formal charges have been made against this student to date. The Prevent Lead is now aware of this case but, as this is still under investigation, it is in the criminal space and a prevent referral has not been deemed appropriate.

There was 1 concern relating to a staff member that was investigated by the Lead Safeguarding Officer (staff). The concern was primarily one of safeguarding but had links to IRA-related terrorism and came to light via concerns for wellbeing/welfare raised by faculty staff. The Deputy-Chief Safeguarding Officer (staff) was informed as it was primarily a safeguarding concern. The staff member was directed to support and as they were receiving external specialist and familial support, it was decided that no further external referral was necessary.

Events and Speakers Approved	
Dataset	
a) Total number of events or speakers approved through the external speakers process	1429
b) Total number of events or speakers approved subject to any mitigations or conditions	8
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.

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. There were 1429 events/speakers approved through the external speaker process in 22/23. 8 events were approved subject to additional mitigations or conditions. Of these 8 events that were risk assessed, 2 were low risk, 5 medium risk, and 1 high risk. No events/speakers were rejected. There were no events with prevent-related risks that required additional mitigations or conditions. The mitigations that were put in place for the risk-assessed events included ticketing events, recording events (so that the College had an unbiased record), safe space recognition, and reminders and presence of a Duty Dean (for high/medium risk events).

Training	Number
a) Number of staff identified as key in relation to the Prevent Duty	432
b) Number of key staff receiving induction Prevent training	92
c) Number of key staff receiving refresher Prevent training	31

Section 3: Prevent Declaration for 2022/23 (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	[Enter name]
Title	[Enter title]
Signed	[Paste electronic signature or sign here]
Date	[Enter date signed]

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

Declarations should be signed by the chair of the governing body or proprietor (where a governing body does not exist) or a person within the provider who has 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.

Annual Statement on Research Integrity

2022-2023

King's College London is a world-leading, research-intensive institution. We are 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, 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. We work closely alongside our colleagues within the wider department of Research Governance, Ethics and Integrity, as well as within the Research Management & Innovation Directorate, and beyond.

This statement on research integrity at King's College London relates to the period 1 September 2022 to 31 August 2023 and has been drafted to fulfil our obligation to commitment 5 of the Concordat to Support Research Integrity. As before, we attempt to capture the breadth and depth of our initiatives coordinated centrally and locally, though we acknowledge that such a report can never be fully comprehensive as there are undoubtedly activities undertaken by staff and students that fall under the banner of research integrity but are not recorded as such.

This year's statement uses the model template developed by the UK Research Integrity Office with the Concordat Signatories Group and so the format and scope of information presented differs from that of previous years.

Section 1: Key contact information

Question	Response
1A. Name of organisation	King's College London
1B. Type of organisation: **higher education institution/industry/independent research performing organisation/other (please state)**	Higher education institution
1C. Date statement approved by governing body (DD/MM/YY)	*Pending approval by Council*
1D. Web address of organisation's research integrity page (if applicable)	www.kcl.ac.uk/research-integrity
1E. Named senior member of staff to oversee research integrity	Name: Stephen Large Email address: stephen.large@kcl.ac.uk
1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity	Name: Natasha Awais-Dean; Serena Mitchell Email address: research-integrity@kcl.ac.uk

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

2A. Description of current systems and culture
Since 2019, King's College London has had a dedicated stand-alone function to ensure the maintenance of high standards of research integrity and promotion of a positive research culture. The Concordat to Support Research Integrity provides the framework for all activities of the Research Integrity Office (RIO), which adopts a four-pillar approach to achieve this, covering: policies and procedures; training; engagement; and research misconduct. As reported in last year's statement, a third Research Integrity Manager (RIM) took up post in September 2022. Each RIM had responsibility for researcher engagement within three faculties, with research misconduct investigations or more complex research conduct

enquiries being divided equally following triage. A 0.6FTE Open Research Project Coordinator joined the RIO in November 2022 to support the UK Reproducibility Network (UKRN) Open Research Programme (ORP).

Policies and systems

We expect all King's research to be conducted in accordance with the UK Research Integrity Office's (UKRIO) Code of Practice for Research and this expectation is set out on our externally facing webpages, where research-active members of the University are also directed to adhere to the commitments for researchers under the Concordat. Assurances on proper and timely reporting to funding bodies of issues related to research integrity or bullying and harassment are provided by the Memorandum of Understanding existing between the RIO and HR and the Pre-Award Reporting Standard Operating Procedure. A framework is in place to support authorship dispute resolutions, where these are not appropriately handled under the research misconduct procedure. King's has a formal Procedure to investigate and resolve allegations of research misconduct ('the Procedure') to ensure that we manage fairly, robustly, and effectively any allegations of potential research misconduct. This Procedure aligns with the model version published by UKRIO.

Training

The RIO offers termly training on the fundamentals of research integrity to all research-active staff and students and all colleagues within research support related roles. This training is bookable via the King's training portal, SkillsForge. This interactive 90-minute session receives consistently positive feedback through evaluation. More bespoke, disciplinary-focused training is offered by the Research Integrity Office in collaboration with our local Research Integrity Advisors (see below for more information on this network). This offers more in-depth consideration of research issues through a discussion-based format using a range of relevant case studies and dilemmas. Topics under the research integrity banner are delivered by other central teams: Libraries & Collections, including on research data management and open research; the Centre for Research Staff Development, for example on building successful collaborations and managing research funds; and the Centre for Doctoral Studies, such as on writing grant applications and analysing qualitative data.

Communications and engagement

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

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

The Libraries & Collections (L&C) team has a dedicated researcher focused web presence to provide information and advice on good open research practices and additionally

communicates via various newsletters and by providing verbal updates at institutional, faculty and departmental meetings.

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

- Subscribers to UKRIO: in the reporting period contributed to the consultation of an online training course.
- Institutional members of UKRN and a contributing member of the ORP.
- Members of the Russell Group Research Integrity Forum: in September 2022, hosts of the first in-person meeting since the outbreak of the pandemic; and part of the steering group for the October 2023 meeting.

Culture, development and leadership

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

- Social Science & Public Policy: publication subvention fund (up to £2500 per individual) to promote Open Access research; in May 2023, the launch of the 'EDI Principles in Research Grants'[2] policy; requirements for 10 days of Continued Professional Development for research staff included in the Workplace Allocation Model; in May 2023, launch of PGR strategy which includes reference to research culture; and limited funds available to support ad hoc initiatives.
- Faculties, including the Faculty of Life Sciences & Medicine and King's Business School, held faculty-wide discussions with staff and students in May 2023 as part of the consultation process for the Wellcome Trust research culture bid.
- The Florence Nightingale Faculty of Nursing, Midwifery and Palliative Care: research integrity integral to the Inclusive Research Practices Implementation Plan; research integrity part of the 2-yearly training programme.
- Natural, Mathematical & Engineering Sciences: RIAds are listed on departmental SharePoint sites; research integrity issues can be reported via the EDI anonymous reporting tool or, in Physics, at Research Deep Dives.

Monitoring and reporting

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

A comprehensive log of all enquiries received by the Research Integrity Office has become more sophisticated to reflect the nuances of issues. The log now captures the different stages of an investigation and records reporting required by funders of bullying & harassment.

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[2] Available internally only.

2B. Changes and developments during the period under review

During the period under review (1 September 2022-31 August 2023), awareness of research integrity has continued to increase steadily and there have been developments within the sector. The Research Integrity Office has responded accordingly by working collaboratively with others both internally and externally to ensure our researchers remain abreast of issues and are enabled to conduct their research robustly and with the highest standards of rigour.

New initiatives, and new or revised policies, practices or procedures

The RIO creates new guidance, develops new initiatives, or revises relevant policies, practice or procedures as appropriate to meet the need of our research community. Examples of the RIO's activities in this regard follow.

- Design of a more coordinated approach to reporting on bullying and harassment investigations (whether through the grievance or disciplinary processes) to funders where required. Better awareness of the processes outlined in the MoU with HR (through enhanced working relationships) has led to increased reporting, allowing the RIO to maintain accurate records also for pre-award purposes, thereby ensuring compliance with funder policies.
- Development of guidance to identify how to embed research integrity within research collaborations. This covers a range of collaborations, across geographical, institutional, disciplinary, and sectoral boundaries.
- Leading on a cross-university approach to the responsible use of Generative Artificial Intelligence tools (such as Chat GPT) in research.
- Consulted on guidance to embed EDI in participatory research.
- Formalised process for research integrity and research misconduct expert review in relation to due diligence checks on potential research partners.
- Contributing to Electronic Lab Notebooks project with FoDOCS. To be introduced across health faculties and NMES to allow for the accurate documenting, retrieval, and timestamping of data, to improve research integrity.
- Development of a quick card 'Research Integrity on a page' in collaboration with the RIAd for the School of Education, Communication and Society (SSPP). This was designed to facilitate raising awareness of research integrity and support offered by King's and colleagues are encouraged to share this widely. Feedback from this has been universally positive.
- Liaison with publishers via COPE for better sector coordination.

Other parts of KCL also contribute to developing new initiatives, policies, processes, and procedures. A multi-disciplinary research grant was submitted with investigators from several faculties (the bid is awaiting response). This aims to integrate arts and humanities into healthcare education and practice, thereby improving the integrity of clinical research. Libraries & Collections revised the Research Publications Policy in March 2023, while under revision in 2023 are the Research Data Management Policy and the Institutional Affiliation & Acknowledgement of Funders Policy.

Training

Within the reporting period, the RIO continued to deliver the termly research integrity training session, available through the KCL training portal SkillsForge. Local Research Integrity Advisors and other advocates of research integrity within faculties signpost colleagues to this. This continues to be offered as an online course. One in-person session was offered but uptake was low, suggesting that researchers prefer to participate in this general introductory training virtually.

As noted above, training on topics that address good research practices is delivered by the RIO and other colleagues. In the reporting period, the RIO provided training on research integrity to more than 550 researchers. Almost 2000 researchers engaged with training in this area and in research ethics and research governance combined, delivered by the teams within the department of Research Governance, Ethics and Integrity. Local, more focused training and engagement was supported by academic participation as outlined below.

- September 2022: HR Management (King's Business School) workshop on Responsible Research led by RIAd and colleague, funded by Faculty Innovation Fund.
- October 2022: FoDOCS PGR induction included research integrity as part of the session on EDI and wellbeing.
- October 2022: FoLSM PGR induction event included introduction on research governance, research ethics and research integrity.
- October 2022: Mathematics (NMES) awareness-raising session led by RIO.
- October 2022: Chemistry (NMES) MRes student session on research integrity and open research co-delivered with local staff.
- October 2022: Engineering (NMES) PGR induction event included introduction to research integrity .
- February 2023: FoLSM PGR induction event included introduction on research governance, research ethics and research integrity.
- May 2023: HR Management (King's Business School) workshop on Responsible Research led by RIAd and colleague, funded by Faculty Innovation Fund.
- May 2023: ECS, RIAd-led session 'Did a Robot Write My Report?' to explore the nature of authorship.
- May 2023: SSPP Research Away Day.
- May 2023: RIO met with A&H Early Career Committee to discuss the wider promotion of research integrity.
- May 2023: NMES Graduate School training programme session on research integrity.
- June 2023: FoLSM PGR induction event included introduction on research governance, research ethics and research integrity.
- June 2023: A&H Research Culture Afternoon included dilemma-based roundtable discussions on research integrity facilitated by the academic RIAds to raise awareness and support better understanding of research integrity in an arts and humanities context.
- July 2023: FoDOCS Faculty Research Away Day for PIs included session on research integrity led by RIAd using case studies and supported by RIO.
- n/d: A&H identification of areas for targeted training to include plagiarism, fairness and credit in research collaborations, and co-production/working in or with Low and Middle Income Countries (LMIC) or less advantaged communities.
- n/d: FoLSM provided research integrity training to DTPs and CDTs.
- n/d: Physics (NMES) identification of authorship on peer reviewed publications at Research Away Days.
- n/d: L&C training on research data management delivered on request and available monthly, bookable on KCL training portal.
- n/d: L&C training on Open Access publishing delivered on request.
- n/d: King's Business School training on research integrity led by RIAds and supported by RIO in the departments of HRM and Public Services Management & Organisation (PSMO).

Following the Wellcome Trust audit, as reported in last year's statement, the RIO produced 4 x 20-minute videos on the following topics: introduction to research integrity; research integrity at King's; research misconduct; research misconduct investigation panel guidance. An initial version of these are available through the King's Virtual Learning Environment, KEATS, to all staff and students but further development of the material is ongoing.

Developments

Following an external review of the existing research culture initiatives in place, resource was made available for dedicated professional services support in this area. A Project Manager worked with the Dean of Research Culture for 6 months until August 2023. In this time, a range of listening exercises were held with faculty staff, research culture webpages were published, and a funding round was announced for local schemes on research culture. Recruitment for a permanent 1FTE Head of Research Culture and 18-month 2 x 1FTE Research Culture Managers was successful, with postholders in place by Autumn 2023.

L&C recruited a 2-year FTC Research Community Engagement Manager to support researcher engagement and outreach activities. In the reporting period, L&C launched an Open Research X (formerly Twitter) account.

Faculty developments include the following:

- Creation of an A&H online Faculty Research Hub (delivery anticipated in Autumn 2023) to be a one-stop shop signposting researchers to the available support. An area will be dedicated to research integrity and include relevant dilemma-based materials, which have been developed in collaboration with RIO.
- Increased numbers of RIAds in FoLSM to ensure greater visibility across sites and schools.
- Creation of training toolkit in FoLSM.
- Increased numbers of RIAds in King's Business School, due to role being embedded within the role description of departmental Research Leads.
- Creation of NMES Research Hub with section on research integrity.
- Chemistry (NMES) holds quarterly 'Research Chats'.

2C. Reflections on progress and plans for future developments

Review of progress and impact of initiatives related to activities mentioned last year

It is clear that at King's, awareness of research integrity has been progressively growing. Indicative of this is that the RIO has seen a steady increase in the number of enquiries (formal and informal) on research practices and requests for training or resources. To respond to this, many plans are developing centrally and locally to enhance provision of support in this area for the future.

Plans for future developments
- Building on an initial review by RIO of training delivery across Research Governance, Ethics and Integrity, there are plans to embed an evaluation process of our training within our work practices.
- RIO to continue development of the training videos (see above) to respond to feedback from academic and PS colleagues, improve accessibility, and create accompanying resources. This will enable wider dissemination of RIO training across KCL.
- Through the RIO's participation in the UKRN ORP, the next couple of years will see a rollout of several new training sessions and a train the trainer programme on

various topics related to open research and reproducibility for staff and students across all faculties at King's. Alongside the provision of training, RIO will participate in the open research indicators workstream with the aim of developing tools to assess open research practices to enable better institutional support. In the reward and recognition workstream RIO will also participate in a collaborative community of practice, piloting tools such as a maturity framework and self- assessment tool.

- RIO to create tools for evaluating integrity cases to identify in a more coordinated approach areas for policy and training development.
- A survey conducted during the ECS (SSPP) training session referenced above exposed a lack of knowledge with the Concordat to Support Research Integrity and ways to report concerns with research practices. These will be areas of focus for 2023/34 through collaboration between the RIO and ECS.
- In A&H, research integrity (and research culture) will be part of new staff induction for 2023-24, while in the same year research integrity will be included in PGR induction. Departmental level training will be adapted to include more bespoke, dilemma-based discussions. Research integrity will continue to be included at the annual Research Culture Afternoon. 2023/24 will also see the launch of the Research Development Programme, with a dedicated session on research integrity.
- FoDOCS intend to develop enhanced training in research culture for all staff in 2023/24 and to update the research integrity online presence to include case studies relevant to disciplines within the faculty.
- FoLSM plan to embed research integrity within Schools' induction programmes for staff and students and develop tailored training for faculty executive and PS staff, for example informing technicians on appropriate recognition or providing administrative staff support in signposting. There are plans to work with the Vice Dean, People and Culture to create internal online presence on research integrity and research culture. An ECR conference scheduled for November 2023 will include a session on research integrity. There will be better coordination between the roles of Confidential Advisor and RIAd.
- NMPC plan to deliver a Research Division roadshow.
- NMES to continue developing the research integrity section on their research hub. The Department of Chemistry is considering including research integrity as part of recruitment processes and within the Workload Allocation Model, and aligning it with EDI. The Department of Physics plans to hold another Research Integrity Staff Training event in 2023/24.
- KBS to continue locally run training sessions in 2023/24 to promote research integrity and to encourage it as part of the discussions through informal networking between academic and PS staff. Research integrity will be embedded within annual induction sessions for new academic staff, which will be recorded so that staff joining in-year can access the same information. There are plans to develop better internal and external online presence of both research integrity and research culture. A Research Lead Away Day scheduled for September 2023 will incorporate research integrity on the agenda.
- L&C will make Open Access Publishing training bookable via the KCL training portal.

Issues hindering progress, e.g. resourcing

At King's, we acknowledge that the research integrity landscape is constantly shifting and that as an institution we must respond swiftly. Research integrity is therefore a process of continual improvement that can only be achieved through slow, incremental changes to enhance the quality of our research.

External factors, such as changing funder requirements, the geopolitical situation, and national R&D policy developments can impact our progress. In addition to these, there are

internal constraints. The RIO has seen a steady increase in research integrity queries and concerns; this is likely attributed to increasing awareness of the RIO at King's and an increasing awareness of research integrity nationally. Issues brought to the attention of the RIO are also becoming more complex, and whether they are managed informally, or investigated formally, they often require coordination across many stakeholders and take a considerable amount of time to resolve. With more focus being diverted to casework, there has been less time within the RIO to devote to develop enhanced training options (such as an online training module), finalise policy and guidance documents, or work more closely in partnership with local RIAds.

The additional Research Integrity Manager appointed to the RIO in September 2022 left just before the end of the reporting period. This will affect progress into the academic year 2023/24. Lack of resource has also been identified in some faculties as preventing more training capability.

2D. Case study on good practice (optional)
Please describe an anonymised brief, exemplar case study that can be shared as good practice with other organisations. A wide range of case studies are valuable, including small, local implementations. Case studies may also include the impact of implementations or lessons learned.

Senior THRIVE programme within the IoPPN.

Section 3: Addressing research misconduct

3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct

Processes/Policies

King's College London is committed to conducting its business in a fair and transparent manner. As an institution, we are committed to creating an inclusive and respectful environment for all members of our community. We are a large and complex organisation, with many different stakeholders, and therefore many different routes for resolving varied concerns or complaints.

A simple way for students, staff, and visitors to report incidents of inappropriate behaviour and access support services is through the Report + Support portal. Our Bullying & Harassment Policy outlines the University's commitment to preventing and effectively addressing bullying and harassment, enabling a culture where all individuals are valued and supported to succeed.

The 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 November 2022 following approval by the Academic Board to include indicative timeframes for key stages of the Procedure. These are reflected throughout the Procedure and set out for clarity as Annex 2. Minor amendments to this were made in April 2023 to reflect more accurately the updated role title of Vice President (Research) to Vice President (Research & Innovation).

The Procedure is to be carried out in accordance with the principles of fairness, confidentiality, integrity, prevention of detriment, and balance, and these are defined with Annex 1 of the Procedure. There are appropriate mechanisms and safeguards in place

within the Procedure to ensure adherence to these principles and that the process is transparent and robust. Accompanying guidance for managing an appeal, to promote a robust and fair process, is made available in the event of an appeal. This was updated in April 2023.

King's makes every effort to meet its obligations to external bodies, including regulatory and professional bodies, regarding the initiation or completion of a formal investigation. To the knowledge of the Research Integrity Office, KCL has met such obligations.

Any concerns, complaints, or allegations may also be made under the King's Whistleblowing Policy.

Creating a safe environment for concerns to be raised

The network of Research Integrity Advisors was developed to support informal liaison processes. Enquiries reported from various faculties suggests this approach has been successful and that students and staff feel comfortable in approaching a trusted colleague.

Processes (formal and informal) for reporting concerns about research conducted in King's name is communicated to our community of research-active staff and students through our training sessions and is also visible on our webpages. The RIO provides assurance to researchers that they should feel safe to report poor research practices, either to us or at local level. The RIO encourages researchers to approach us or local contacts (ordinarily the Research Integrity Advisors) if they feel that they or others have failed to meet the expected standards of good research practice, so that we can offer appropriate advice on how to mitigate any risk, and then advise on the next steps should it be appropriate to report research misconduct.

Information about the Procedure is available on our Research Misconduct webpage, along with advice and support, to all staff, students, and individuals external to the University who wish to raise an issue about the conduct of research undertaken in King's name.

During an investigation, we may signpost to mental health support provided by King's to staff and students, where appropriate.

To demonstrate King's commitment to appropriately signposting and handling all complaints of any nature, including those related to research, a public-facing webpage for all institutional complaints processes was developed.

Lessons learned

The Research Integrity Office intends to update the Procedure further, following consultation with the Research Integrity Champions in 2019/20 over proposals to make King'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, how to work effectively when legal input is sought from any party, and how to manage third-party notifications and work collaboratively with other parties. Within the reporting period, the appeal process was clarified and updated guidance was approved to ensure more robust, transparent and fair actions can be carried out at this stage.

3B. Information on investigations of research misconduct that have been undertaken

*Please complete the table on the number of **formal investigations completed during the period under review** (including investigations which completed during this period but started in a previous academic year). Information from ongoing investigations should not be submitted.*

An organisation's procedure may include an initial, preliminary, or screening stage to determine whether a formal investigation needs to be completed. These allegations should be included in the first column but only those that proceeded past this stage, to formal investigations, should be included in the second column.

Type of allegation	Number of allegations			
	Number of allegations reported to the organisation	Number of formal investigations	Number upheld in part after formal investigation	Number upheld in full after formal investigation
Fabrication				
Falsification				
Plagiarism				
Failure to meet legal, ethical and professional obligations		*2*		*1*
Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)	*1*	*1*		
Improper dealing with allegations of misconduct				
Multiple areas of concern (when received in a single allegation)				
Other*				
Total:	**1**	**3**	**0**	**1**

*If you listed any allegations under the 'Other' category, please give a brief, high-level summary of their type here. Do not give any identifying or confidential information when responding.
[Please insert response if applicable]

<div align="center">**Safeguarding Report 2022-23**</div>

The Safeguarding Steering Group oversees all Safeguarding activity, including the approval of updated policies and the annual review of the Safeguarding Risk Assessment and Action Plan. The Steering Group is chaired by the Vice President (Education and Student Success). In 2022/23, the Steering Group met in October and June. Currently the KCLSU President is a member of the Group. This will continue into 2023/24; however, it has been agreed that a permanent staff member of KCLSU will also be made a member for continuity purposes.

The Safeguarding Oversight Group provides operational support to the Safeguarding Steering Group and is co-chaired by the Associate Director (Academic Regulations, Quality and Standards) and the Associate Director (Advice, Wellbeing and Welfare). The Safeguarding Oversight Group met four times during the year. Engagement with the Safeguarding Oversight Group has been positive and has continued to develop over the year. Standing Items on key student areas include: Under 18s; Bullying, Harassment & Sexual Violence; Support for Study; and Student of Concern. All Lead Safeguarding Officers participate in the Oversight Group and the group's membership consists of representatives from across the College, including Residences, Security, Widening Participation, HR and International. The KCLSU VP Welfare and Community and a member of the KCLSU Advice team are members of the Oversight Group. As part of ongoing activity, LSOs are required to review and assess their respective areas for procedure updates as well as training needs.

Policy and Procedure Updates

The Safeguarding Policy is reviewed annually to ensure compliance with British Council requirements for King's International Foundation Programmes and to ensure alignment with any new or updated government legislation. In September 2022, the Safeguarding Policy underwent a substantial review, and the updated version of the policy was uploaded to the Policy Hub in December 2022. Key areas of focus were:

- Feedback from the British Council inspection in 2021/22.
- Revision to the section on international activity to ensure alignment with the recently revised international protocol.
- Revision and reorganisation to content relating to staff, including streamlining content on staff training.
- Including references to working with local authorities and how information is shared.
- Including references to the procedures to follow when next of kin need to be contacted in an emergency.
- Clarifying that any concerns relating to someone being drawn into terrorist activity are embedded in our safeguarding approach and procedures.
- Updating links to associated policies, procedures and external legislation.

Other developments of note from 2022/23 include:

- The Prolonged Lack of Contact, Home Visit, Student Emergency Contact and Missing Persons Procedures were all reviewed, updated and uploaded to the Policy Hub.
- The Drugs and Alcohol Misuse Policy was also reviewed and an updated version was uploaded to the Policy Hub in April 2023.

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

Students and Applicants

Under 18s

At the start of the academic year 2022/23, 307 students were under the age of 18 when joining King's for their first year of study. By March 2023, 70 students remained under the age of 18. By the end of the 2022/23

academic year, only 3 students across 2 faculties remained U18 when entering their second year in 2023/24. 4 KIF students will be under the age of 18 if they choose to remain at King's in 2023/24.

The remit of the Designated Safeguarding Officer (DSO) role includes supporting departmental colleagues in undertaking activity involving under 18s and adults at risk. A DSO Responsibilities and U18 Checklist document was recirculated to all DSOs in September 2022, setting out key aspects of the role and required activities. This included a mandatory individual risk assessment template for any student aged 16 or under, which the DSOs are required to complete. All DSOs were required to report on checklist completion and progress supporting their faculty's under 18 students to the Safeguarding Oversight Group twice in the year. The Faculty Wellbeing and Welfare Advisors have been supporting activities relating to students under the age of 18, including arranging follow-up meetings after non-attendance. In the last SOG meeting of the year, feedback from DSOs included:

- The support given to DSOs was appreciated and the established processes were useful to support their U18 students.
- One issue revolved around emergency contacts not being a UK person, this will be reviewed in 2023/24.
- King's residences informed that there will be further safeguarding training given at the beginning of the year to students, to reduce the issues around not "checking out" and risk being considered as "missing". An update on how this will be delivered and to whom will be discussed in the Safeguarding Oversight group at the beginning of 2023.

Bullying, Harassment and Sexual Violence

Last year, a key focus was the implementation of the new Report & Support Tool which has been received well by students and staff. There is more engagement in comparison to prior process, with most reports from undergraduate students. The data generated from this is crucial to informing future preventative measures. Data from this will be fundamental for reporting next year as it will be possible to analyse data on named vs anonymised reports as well as staff vs student reports. A new Strategic Programme Manager for Diversity and Inclusion has been recruited who willl work across staff and students and will formulate how the data from Report and Support will be shared going forward.

The Preventing and Addressing Harassment and Sexual Misconduct group met twice over 2022/23. This group has continued to report to the Safeguarding Oversight Group throughout the year. The staff and student relationships policy is also being reviewed and a small working group was convened to discuss progressing this work, which is currently being led by HR, and is awaiting the outcome from the Office for Students consultation on staff and student relationships on whether to ban or strongly discourage this. The Safeguarding Oversight Group continues to be updated on this activity.

Student of Concern Procedure

A total of 1864 referrals were received in 2023/24, compared to 1636 in the previous academic year – an increase of 13%.

Primary concerns/Year	2022-2023	2021-2022	2020-2021	2019-2020	2018-2019
Mental Health	1109	1029	628	457	349
Welfare	755	607	382	262	145
Total number of SOC Referrals	**1864**	**1636**	**1010**	**719**	**494**

Of the 755 Welfare referrals, 'prolonged lack of contact' was the primary concern for 286 (40% of welfare) referrals. In terms of mental health referrals, 502 were risk-related (i.e., self-harm, suicide risk) and 607 referrals

were mental ill-health related. A total of 73 referrals reported suicide attempts, compared to 70 suicide attempts reported in the previous academic year 2021-2022 and 41 in 2020-2021. The increase in referrals may also be down to improved awareness and confidence in procedures from staff.

A review was carried out at the beginning of the academic year, focused on improving staff understanding of obtaining informed consent for referrals as well as improving the SOC form. Feedback was sought from faculties and relevant stakeholders and the Student of Concern Procedure was revised. An updated version was uploaded to the Policy Hub in July 2023.

Engaging statutory services about students who are losing accommodation remains challenging. The SOC team are working closely with the Money and Housing advice team as well as Citizens Advice to improve this. Data on student awareness of referrals highlight a significant improvement this year compared to last year.

Awareness of a referral being made is also important for student engagement. To aid with this, the SOC team created a draft template email and shared with faculties to send to students to explain when and why a referral is made and what to expect.

Support for Study
There are three stages to the process:

- Stage One is Faculty led involving the personal tutor or other appropriate staff.
- Stage Two is also Faculty led but involves the senior tutor and is an escalation point from Stage One.
- Stage Three is supported by central services with Faculty representation.

Please see the table below for details of those students whose cases have been considered at Stage Three of the process and the decisions made in those cases:

Faculty	Continuing studies with conditions	Voluntary Interruption	Mandatory Interruption	Mandatory Withdrawal	Interrupted due to capacity	Review	Total 2022/23	Total 2021/22
A&H*	10	0	4	1	2	2	17(19)	9 (10)*
FDO&CS	0	0	0	0	0	0	0	2
FoLSM	8	0	1	1	0	2	10(12)	11 (13)*
FNFNMPC	0	0	0	1	0	0	1	2
IoPPN	8	0	2	1	0	3	11(14)	15 (16)
KBS	0	0	0	0	0	0	0	1
Law	6	0	2	1	0	0	9	3
NMES	6	1	5	0	0	0	12	4
SSPP	10		4	4	1	4	19(23)	12 (13)
King's Foundations	0	0	0	0	1	0	1	0
Study Abroad	0	0	0	0	0	0	0	1
Total	**50**	**1**	**18**	**9**	**3**	**11**	**80 (92)**	**60 (65)**

*numbers that are in brackets indicate total including review cases

It has not been possible to provide in depth details of students' background, such as those relating to Equality & Diversity, as the information is not currently stored in a case management system. However, it is hoped that this information will become available in the future once a case management system through SCAMP (Specialist Case and Appointment Management Project) is established.

The data shows a **40% increase** in the number of students who had meetings at Stage Three including reviews. There are also currently 35 students who are on the waiting list to be seen at Stage Three, but have not, due to resourcing issues with staff. Ideally these students should have been seen within the academic year of 2022/23 but there is a backlog of over 4 months until the end of January 2024. In addition, to this a number of cases have been deescalated to Stage Two, supported by Student Services to help manage the backlog.

There have also been 126 case conferences in relation to Support for Study, which is fewer than the previous year, due to improvements made to the sharing of information with the Faculty by the Student of Concern Management Group, which includes providing a summary report on a student case. As the numbers for both Stage Three meetings indicate, there has been a significant increase in workload across the University, which has caused strain on resources for both Faculty and central services staff.

In terms of outcomes, in 2022/23 a greater number of students were allowed to continue with conditions (63%) rather than interrupted on a mandatory basis (22%) compared to whereas in 2021/22, when 58% of students seen at Stage 3 were interrupted on a mandatory basis and 33% of students were allowed to continue their studies with conditions. This demonstrates the commitment of university staff to support students wherever possible to continue their studies.

A working group met on a monthly basis in the last academic year led by the Associate Director Student Conduct & Appeals together with a number of colleagues from Student Services, Residences, Faculties (academic and professional services staff) and KCLSU Advice and student representatives, to review the policy and procedure and agreed for changes to be made to the policy and procedure which are as follows:

- A new "Stage Two Supported " which is supported or led by Student Services teams to provide support to students and staff in more complex cases
- Residences can now lead on Stage One and Stage Two meetings
- Outcome letters at Stage Three can now be signed off by a senior member of staff within Students & Education as well as a senior member of staff within Faculty
- Mandatory Interruption due to incapacity has now been updated following consultation with the Counselling & Mental Health Service to clarify when interruption on this basis might be made and the language has been changed to state "Mandatory Interruption due to serious concerns in relation to physical or mental ill health where the University believes that it is appropriate to act without delay and where it does not think it is appropriate to meet with the student before placing them on interruption."

The working group also produced guidance for students and draft guidance for staff which is currently being further developed.

Additional resourcing has been agreed for Support for Study due to the continued increases in the number of cases, with new roles currently being advertised for a new Head of Support for Study, Case Manager (Support for Study) and Senior Coordinator (Support for Study). These roles are expected to be in post for 23/24. However, there are still significant concerns that the new resourcing for Stage Three will not address the backlog at Stage Three effectively, as well as lack of institutional understanding of the resourcing of the process at both Stage One and Stage Two.

Training
In the period 1 August 2022 to 31 July 2023, 97 members of staff received face to face training via Microsoft Teams on Safeguarding and Prevent. This included members of the Faculty Wellbeing and Welfare Advisors, Designated Safeguarding Officers, Senior Tutors, Disability Support & Inclusion, ARQS, Residences Welfare Leads and Residences Management Team and Security Staff. Positive feedback has been received for the sessions. 6

members from SED and the Residences Wellbeing Manager took part in external training held by the DfE on Incels, online platforms and gaming sessions. Further training sessions took place during April and May 2023 for Senior Tutors and some members of Security. This was followed up by additional information about Incels being sent out for further awareness and guidance.

The Training Dashboard continues to be updated, monitoring the training of key groups across the College. Key groups of staff integral to the student piece have been identified including Colleagues in Student Services, Residences, Security and Chaplaincy as well as Senior Tutors and SMT. Face to face training is delivered on a 3-year cycle.

The Associate Director, Advice, Wellbeing and Welfare has begun work to support Student Support Managers in understanding safeguarding and reflective work practices. These are new roles that are managed by the student experience managers. All Student Support Managers have DSO responsibilities. Since May 2023, The Student Support Managers have been meeting monthly with the Associate Director to discuss safeguarding concerns and cases. This will continue over the 23/24 academic year.

E-module
In the period between 1 August 2022 to 31 July 2023, **154** staff members completed the Safeguarding at Kings e-module and passed the end of module assessment. Positive feedback on the e-module has been received.

Work is underway on updating the content to ensure accuracy and move the e-module over to WorkRite, the University's e-training platform. This would make the training more accessible and with the intent to make it compulsory for all staff. This is expected to be completed by September 2023.

Widening Participation
The Widening Participation Department have procedures in place to safeguard staff as they undertake activities, and to safeguard the individuals involved.

In October 2022, 24 members of the Widening Participation department attended the CPD accredited course entitled 'Child Protection Awareness training for professionals' run by ECP, Education Child Protection. The NSPCC Child Protection e-training forms part of the staff induction process for all new members of staff in Widening Participation. Any Widening Participation staff running online events are required to complete the NSPCC Keeping children safe online training. In the period 1 August 2022 and 31 July 2023, there were 9 new starters, who all completed the necessary induction training.

The Widening Participation department conduct safeguarding training annually for current students hired to work as student ambassadors as part of our ambassador scheme. Training was delivered in February and May 2023 to all newly recruited student ambassadors. Project leads (Senior Officers and Managers) also run safeguarding refreshers for ambassadors as part of programme briefings and additional safeguarding training is delivered for ambassadors working on summer school programmes (this includes both non-residential and residential). The Widening Participation Department works with 2000-3000 young people every year, and it is anticipated that a few safeguarding issues may arise. Usually these are easily resolved during the interventions or soon after, and often turn out to be inconsequential. These are logged by the Widening Participation team regardless. In the period between 1 August 2022 and 31 July 2023, there were 13 incident report forms submitted in relation to safeguarding; all of which were actioned and resolved.

Processes in place are robust and these include escalation procedures, incident reporting procedures and one-to-ones with the officers to debrief.

Staff/HR
In the period between 1st August 2022 and 31st July 2023, there was 1 staff concern that was a safeguarding concern and had elements of a risk of radicalisation. A brief summary is included in the 22/23 Prevent report.

A web link to an internal safeguarding webpage detailing current Safeguarding Officers was sent to Head of Human Resources Operations to assist with the DBS renewals work. An extensive list of staff members requiring a DBS was then compiled and submitted to HR for processing.

A review of the policy on staff-student relationships is underway and will consider power dynamics of staff relationships. An update will be provided, and feedback sought at the Safeguarding Oversight Group in 2023/24.

Visitors and Safety

During 1 August 2022 and 31st July 2023, only one report relating to safeguarding was reported to the security team and this involved summer school students. This was promptly resolved.

All members of Security staff receive broader safeguarding and welfare training as part of their induction, and this includes information on the Student of Concern procedure. Security managers continue to deliver regular briefings on how to deal with student of concern (SOC) referrals and staff members encouraged to always complete the SOC forms for incidents requiring one. A new Head of Security was appointed at the end of the year and has committed to attending safeguarding training in 2023/24.

The Head of Security was also granted permanent access to student records from December 2022, giving authority to access student contact details in emergencies. The introduction of the Out of Hours security managers in January 2023 has been a welcome development as they will assist the team in dealing with safeguarding related incidents that require prompt escalation.

International

No safeguarding issues were raised or reported by the Lead Safeguarding Officers.

Global Engagement has recently been merged into a new directorate, Global Engagement, King's Service, King's London and King's Global Business Development team called International, Engagement and Service. The new directorate will cover engagement work that is internal and external to King's. All members of the directorate are to complete the King's safeguarding module if they have not already done so and this will be included in the induction training. A new Business Support Manager will be employed in September 2023, who will be responsible for supporting safeguarding training across the directorate. The Partnerships Manager also undertook the Bond good safeguarding training in 2023.

The LSO for KGHP has confirmed that Procedure 4 (International Protocol) and the KGHP Safeguarding Policy remain in place to ensure safeguarding procedures are followed appropriately within this directorate. The KGHP safeguarding page sits alongside the protocol , detailing whistleblowing guidelines and a code of conduct which is signed by all staff and volunteers, and an incident report policy and form.

The Vice-President (International, Engagement & Service) remains a member of the Safeguarding Steering Group membership. Safeguarding was promoted to the King's Partnership committee, the committee that approves new international education and commercial partnerships, as a recommendation to review any likely risk during the approval process.

Academic Relations, Quality and Standards

October 2023

Development of the Board Assurance Framework (BAF)

Executive summary

The attached paper sets out the progress we have made since the last meeting of the ARCC in developing the Board Assurance Framework (BAF).

At the prompting of several members of Council who have used BAFs previously, the concept of a BAF was introduced to the ARCC at its June meeting as a way of assuring both Council and management that the right controls and assurance processes are in place for the College to appropriately monitor its progress towards meeting strategic objectives and mitigating the risks of not achieving them.

Following further work over the summer to familiarise ourselves with the way good Board Assurance Frameworks operate, and from having undertaken some collaborative work with AdvanceHE during their Governance Review at the College, the attached paper develops the proposal beyond the way in which the BAF should be documented and set out, which we presented in June. This paper also proposes that the other committees of Council are utilised more regularly to scrutinise the delivery of strategic objectives and risk management, bringing to bear the expertise of the members in their specific subject areas.

The intention behind introducing a Board Assurance Framework is to provide a "line of sight" across all areas of strategic importance and it will, therefore, be a central plank of governance. This will give Council and Executive alike an easily interpreted view of how the controls and mitigations set up to ensure that threats to the successful delivery of the strategy are minimised. Passing the management of these risks through expert committees for deeper scrutiny, increases the amount of comfort that can be taken by Council and management. The proposed way forward will formalise much of what is currently done into a more systematic process which is much less likely to omit or overlook things. The process is aimed at drawing everything into one place, ensuring that high quality conversations about the College's delivery of its strategic objectives can be had at governance level, with a common taxonomy and understanding of issues from a single "gold source" of information. Once implemented, the process is intended to be streamlined and efficient, to provide an authoritative and easy to understand view of the College's risk management systems. As such, it is intended to contribute to the Simple, Nimble and Effective agenda.

The Secretariat is grateful to the Council members who have so far contributed to the development of this proposal, and also to AdvanceHE for their collaboration on this item during the Governance Review.

Members of the Audit, Risk and Compliance Committee are requested to discuss the proposal and provide feedback to be taken into account in the final version which will be presented to the Governance & Nominations Committee and the College Council for approval, alongside the findings and the recommendations of the Governance Review undertaken by AdvanceHE.

Proposal for a Board Assurance Framework

Background

Over the past few months, the Secretariat has been working with several members of the Council and the AdvanceHE Governance Review to draw up a proposal for a more effective framework for the provision of assurance to governors that the objectives of the strategic plan are on track to be delivered. The suggested methodology is a Board Assurance Framework (BAF), which has been widely adopted in the Public Sector, particularly within the NHS. An initial scoping report was put forward to the Audit, Risk and Compliance Committee in June 2023.

This paper builds on that scoping report and puts forward a proposal developed from conversations with governors and AdvanceHE which will set board assurance as a central plank of governance at King's. It proposes a fundamental realignment of what is being assured, where that assurance is taken from, what type of assurance is being provided and where it is scrutinised.

Benefits of the Board Assurance Framework

The HM Treasury guidance on Board Assurance Frameworks notes that the fundamental benefit of the BAF is "the provision of streamlined and synchronised information on organisational performance and the management of associated risks, helping the organisation to operate efficiently and effectively". Specifically, a BAF allows organisations to:

- Provide timely and reliable information on the effectiveness of the management of major strategic risks and significant control issues.
- Facilitate escalation of risk and control issues which require the attention of senior management.
- Provide an opportunity to identify gaps in assurance needs that are vital to the organisation and plug them in an appropriate manner.
- Raise the organisational understanding of its risk profile and strengthen accountability and clarity of controls, avoiding duplication and overlap.
- Support the Governance Statement provided in the Financial Statements with critical evidence.

Establishing a BAF at King's will help Council members to understand the actions of the executive in the context of the strategic aims and objectives which have been agreed by Council. It will create the "line of sight" for Council members on the management of operations which are intended to support the achievement of the strategic goals, which was discussed at the Council strategic away day in September.

Properly implemented, the framework will enable the attention of the Council to be drawn to the areas where its focus is most appropriate and where its input can provide the most benefit. It would support the setting of agendas for the Council and help to better direct the work of its various committees.

Whilst discussions so far on the BAF have focused on its value to governors, it is also important that any changes to current processes also provide value to all levels of management. The Treasury guidance on BAFs is clear that the framework must also have utility for senior management. Since its inception, the Secretariat has been committed to providing value to management through the contribution of the Business Assurance Department to the various improvement agendas in the University. The Secretariat continues in this commitment and believes that the proposed way forward offers a sound methodology for efficiently aligning the oversight role of the Council to the work of the executive in a way which helps the executive focus on the key priorities of the strategy in order to deliver its objectives most effectively.

What should the Council be seeking assurance on?

The Council needs to focus on the most significant risks to the successful implementation of the strategy. Council needs to identify the dozen or so issues which most concern it, and the BAF should be built from that. The ARCC will still continue to monitor the management of key issues which fall outside of the dozen or so risks identified by Council, but the focus for assurance through all layers of governance will be that core set of risks which most concern Council members. These risks should be clearly connected to the delivery of the Strategy 2026, its pillars and enablers.

With this in mind, it is recommended that a small group of Council members who have experience with BAFs in other settings meet with members of the executive in a structured workshop session to identify the chief threats and risks to the strategy, and that the outcome of these discussions drive the starting point for the BAF.

What assurance should be sought?

Once the areas that require assurance have been established, the next step will be to identify the key controls which should be in place to ensure those areas are operating optimally, and in a way which will deliver the goals of the strategy and support the College's business more generally. The overall control environment is made up of several things, including:

- Identified organisational objectives and outcomes
- Coherent business strategy, with sound planning, resource allocation and budgetary control
- Performance management methodologies, including monitoring of key performance indicators
- Project & programme management
- Risk management practices & processes
- Counter Fraud Policy
- Socially responsible and ethical governance structures
- Policies, procedures,
- Partnership protocols
- Compliance frameworks

So that they can take comfort that the College is on target to deliver its strategic goals, the Council need to be able to understand whether the control environment is performing as expected to support that delivery. It is equally important for the Council and senior management to understand where the control environment is performing sub-optimally so that corrections and remediations can be put in place with the aim of supporting the delivery of the strategy.

What sort of information should the Council look to receive?

Having identified what the Control Framework should look like across the College's key delivery areas, the Council will need to receive information which tells them if those areas are operating as expected or whether there are gaps which require remediation.

In an organisation such as King's, this information can be drawn from a number of sources. All relevant information has value, but some might carry more weight when the Council is looking for comfort that the controls and mitigations are operating in a way that will support the delivery of the strategic plans. When judging the relative value of the various forms of information which are coming to the Council, its provenance should be considered. Crucially, the question is whether the information comes as *reassurance* or *assurance*.

Reassurance occurs when an untested assertion is put forward as comfort that an operation or activity is working well. For instance, this information could come in the form of the existence of policies and procedures or risk registers around certain areas or raw performance data. It could also come in the form of opinions from local management, responsible for delivery, on the quality of that delivery. Reassurance is often based solely on a track record of success, a lack of contradictory evidence or perhaps because it is presented by people with a professional background and expertise in the subject area. Whilst it is all useful intelligence, there is a limit to which governors can rely on it, because it is either untested or not fully analysed.

Assurance takes place when information is put forward which is driven from a solid evidence base, is analysed and interpreted appropriately, and is independent. Assurance provides certainty through evidence and brings confidence that systems are working. Assurance will bring triangulated evidence that the controls designed to support delivery of a business objective are actually working to deliver that objective. Assurance comes from assertions that can be supported by evidence and are normally independent.

All of these pieces of data can be referenced in the matrix of information which supports a BAF. These are usually set out using a "three lines of defence" model, which sorts the information out into different categories of reassurance or assurance, according to which "lines of defence" it comes from:

Line	Source	Description	Nature of Assurance	Weight
First	Operational functions that directly own and manage services and their associated risk	Operationial, service delivery or support functions being responsible for the correct and consistent application of organisational policies and approved methodologies for delivering the agreed strategy.	This comes direct from those responsible for delivering specific objectives or operation; it provides assurance that performance is monitored, risks identified and addressed, and objectives are being achieved. This type of assurance may lack independence and objectivity, but its value is that it comes from those who know the business, culture and day-to-day challenges.	Reassurance
Second	Those providing oversight of management activity separate from those responsible for delivery but not independent from the organisation's management chain	Responsible for providing the tools for the first line to be able to deliver the strategy. These will be corporate functions that oversee control or compliance activity, such as quality assurance, financial control, risk management or security. They are responsible for ensuring a viable environment for delivery is present by providing policies, procedures, frameworks, guidelines and other forms of support.	The information provides valuable management insight into how well work is being carried out in line with set expectations and policy or regulatory considerations. It will be distinct from and more objective than first line assurance.	
Third	Independent and objective assessors of the integrity and effectiveness of the delivery of the strategy in the organisation and related controls	Functions that provide independent and objective assurance regarding the integrity and effectiveness of the delivery mechanisms for the strategy. The key provider of this at King's is the Risk Assurance team within the Business Assurance Department. Other assurances in this line can be drawn from independent external sources, such as research funder visits, regulator reports or external reviews commissioned by the College.	This assurance is provided independently of the first and second lines of defence. Generally provided by an Internal audit function, which stands separate to management, operating to professional and ethical standards in carrying out its work. It is also independent of the management line and associated responsibilities. Independent assurance can also be drawn from other sources external to the institution.	Assurance

How will the assurances be assessed for consideration at Council?

Until now, the assessment of the control environment at King's College London has been left solely to the Audit, Risk and Compliance Committee, without any support from any other source. This has resulted in discussions at the ARCC meetings covering a wide breadth of subject matter.

The new approach proposes that each committee of Council should take an active role in the oversight of the management of risk in the College, thereby bringing expert scrutiny to each one. This will be done by each committee scrutinising management's activities to address the key threats to the delivery of the strategy in their own particular areas of expertise. Each committee will, therefore, be required to:

- Draw assurance that the key risks identified by management are the appropriate and most relevant ones.
- Agree the appropriateness of proposed management actions to mitigate or control the risks.
- Scrutinise the evidence provided to them in order to assess the adequacy and effectiveness of the control measures which have been set up to address the threats to strategic aims.
- Liaise with other committees to ensure that the whole system of control is assessed and assured over a reasonable period and that oversight of no risk falls between committees.

This will entail each committee undertaking "deep-dive" assessments of the management of risk in their area of expertise, through discussions with members of the executive and the senior staff responsible for these areas during their regular meetings to the relevant committee. In this way, it will be the relevant expert committee which will evaluate the available evidence on the way in which the College is managing its risk in order to assess whether or not the Council can be assured on it. This will require a change to the terms of reference of each committee (which could be as simple as a standard line inserted into each existing terms of reference), and is also likely to require acknowledgement that members of the Risk Assurance team may need to be in attendance at committees which they do not currently attend in order to present the evidence on which a committee opinion will be based in future.

It is important to note that full mitigation of risks will never be possible and there will always be a residual risk remaining no matter how good the controls or mitigations are. The assurance will be that, on a balance of probabilities, the controls are operating well enough to ensure that the overall strategy will be delivered. The BAF will provide a scoring or rating mechanism to assess the level of residual risk present, so that conversations can take place around appropriate risk acceptance. This should lead to the development of a more sophisticated use of risk appetite in the College and particularly relating to major decisions over time.

Appendix A shows a suggested framework for allocating oversight of assurance to specialist committees. This suggestion is based on the current committee structures, but it does take into account some possible outcomes from the Governance Review.

The proposed framework anticipates a heavy reliance on the Academic Board as subject matter experts in a number of assurance areas. Given that this is such a large committee with a wide range of interests and expertise, it is suggested that consideration is given to giving responsibility for overseeing the work in Academic Board to the relevant sub-committee of Academic Board.

Appendix A also provides a useful opportunity to consider whether the threats to the successful delivery of the strategy are articulated appropriately, and whether these risks are presented at an appropriate level of granularity or concatenation. The risk column of this table is suggested as the initial stimulus for the conversation between Council and the executive on which risks and threats to the strategy need to be identified in the BAF.

What is the role of the audit committee?

In the proposed framework, the role of the ARCC would be to take collate the assurances provided by the scrutiny of the specialist committees and provide a view of the whole assurance landscape to the Council. It would also be the ARCC's responsibility to alert the committees to any changes in the environment or to other dependencies which may impact on the management of risks which they are assuring.

The ARCC would also retain the responsibility for scrutinising the assurances provided for any area of activity which is not covered by an established committee of the Council. Cyber security could be one such example.

How will the framework be managed?

Clearly, the proposed framework will require more co-ordination work between the committees than currently takes place. An effective way to manage this co-ordination in the current structure would be through the Chairs' Committee, although it is noted that this structure may be slightly amended as a result of the Governance Review. To ensure that a management view is appropriately represented, and that the process can be effectively co-created, it is suggested that the Senior Vice-President (Operations) and the Senior Vice-President (Academic) attend any discussions relating to the BAF at the Chairs' Committee.

It is also suggested that the Director of Risk Assurance should be in attendance at these meetings, as the audit and assurance reports created by their team will be vital to ensuring that the various committees have the evidence base that they need to work from to provide an accurate opinion. The requirements of the various committees through the year will also, to an extent, have to drive the formation and shaping of the annual assurance plan each cycle.

The management of the BAF and its preparation for Council and its committees will rest with the Office of Chairman and College Secretariat. This is in keeping with the NHS approach where the Governance Office in each Trust is responsible for keeping the BAF up to date. Clearly, this will involve collaboration with the Risk Assurance team, which is part of the Secretariat, and with the SVPs and their operational management teams.

A worked example

Worked examples for BAF scorecards are presented in Appendix B. These provide an overview of the current risks around IT and cyber security, and sustainable finances. The examples are meant to be indicative, and the scoring has not been through any QA or rationalisation process. These examples are intended to show the sort of information that can be pulled from a BAF, rather than being an accurate contemporary comment on the state of risk management for cyber security or sustainable finance. The narrative sections, however, have been accurately completed.

In considering the worked example, it will be helpful to remember that no process is wholly risk free and there will always be some residual risk. The scorecard attempts to capture this information, showing the level of risk or appetite in the organisation as a "target" risk, and articulating the processes by which the organisation intends to achieve the target score.

Next Steps

The proposal, along with feedback from the discussion at ARCC, will be taken to the Governance & Nominations Committee for its consideration alongside the Governance Review.

Assuming that the GNC recommends the adoption of this framework to Council and the Council approves it, we would aim to start work on its implementation in the New Year.

Resource requirement and timescales

We believe that we can resource this project internally. We have been promised some assistance with education and training on the BAF from our External Auditor, KPMG, and we will be utilising that offer. We believe that partnering with our External Auditor to support us in providing a functioning assurance framework for Council is within the wider scope of the services for which we have just contracted with KPMG for a further five years. However, we would like the approval of Audit Committee to approach KPMG to procure small packets of specific work which we may need within this project to push it towards completion. This is not anticipated to be anywhere near the threshold requiring ARCC sign-off, but we would still like the approval of ARCC to the principle of working with KPMG on this.

Taking into account the time required for the Governance Review to go through Council, during which time we would be initiating the setup of the project, we would anticipate it kicking off in earnest in February 2024 and providing a progress report to the ARCC in March 2024. Anticipating a three-to-four-month long project, we would expect to be able to report on its implementation at the June 2024 ARCC meeting.

The approximate timetable for delivery is:

Month(s)	Deliverable
December 2023 – January 2024	Governance Review final approvals
February 2024	Identification of key risks with Council & senior executive
March – April 2024	Identification of mitigations & controls with management
May 2024	Mapping of existing assurances against the risks, controls and mitigations
June 2024	First cycle of Council committees to consider risk management as part of normal business
July 2024	First presentation of the BAF to the College Council

Summary of recommendations:

1. That a small group of Council members (to include a representation of those who have experience with BAFs in other settings) meet with the executive in a structured workshop session to identify the chief threats and risks to the strategy, and that the outcome of these discussions drive the starting point for the BAF.

2. That the terms of reference for all committees of Council are amended to include a responsibility to consider the assurances provided to the College that threats to the successful delivery of the strategy relating to their areas of expertise are appropriately managed.

3. That the Chairs' Committee or a similar subset of Council is utilised to steer the work of committees and Council into which the BAF connects, and that input is included from the senior executive, most particularly the SVP (Operations) and the SVP (Academic).

4. That approval is given for the project to work closely with KPMG on its delivery, particularly around training and education, but also for small packets of work to be procured from KPMG where necessary to support the timely delivery of this project.

KING'S COLLEGE LONDON
AUDIT, RISK AND COMPLIANCE COMMITTEE
DRAFT ANNUAL REPORT 2022-23

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 2022-23 and comments on any significant issues identified up to the date that it has been prepared. It also comments on the adequacy and effectiveness of internal control, governance, data management, arrangements for securing economy, efficiency and effectiveness (VfM) and arrangements for ensuring legislative and regulatory compliance.

1.2 This report is prepared for the Vice-Chancellor & President and Council of King's College London, as a good practice measure rather than from regulatory mandate. However, it will be shared with the OfS and Research England, if requested.

2. COMMITTEE MANAGEMENT AND ENGAGEMENT

2.1 The Audit, Risk and Compliance Committee (ARCC) met three times during the year and reviewed at each of its meetings the ongoing arrangements for the management of risk as well as a broad range of internal audit reports. Meetings have been held in person, with an option for members to join by video link, via Teams. Members have tended to attend in person, rather than use the video link option. The Committee no longer holds a pre-meeting briefing for members, focusing on specific activities of the College, 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. The Committee plans to hold one pre-meeting information session in the 2023-24 year, when it visits the Crick Institute. This session will be used to meet King's College London research scientists embedded within the Crick, to discuss their work.

2.2 Mr Vinay Jha joined the Committee during the 2022-23 year, to fill the vacancy for a Council member which had been created by the departure of Ms Ros King at the end of the 2020-21 year. Professor Kim Piper joined the ARCC at the start of the year, as a replacement for Professor Guy Tear as the staff member appointed from College Council. Dr Julie Moonga replaced Mr Adrian Signell as the student member. Ms Sarah Wilkinson stepped down from the Committee in July 2023, at the end of her second term. An invitation to join the Committee has been extended to Ms Yolande Young, subject to the recommendation of the Governance and Nominations Committee and the approval of Council.

2.3 The Chair continues to have regular meetings and discussions with the Deputy College Secretary & Chief Compliance Officer, who line-manages the Business Assurance function. During the year, the Chair of the ARCC has also had access to the Director of Risk Assurance, who manages the day-to-day audit and assurance work at the College. The independence of the Business Assurance function from university management is ensured through these on-going relationships.

2.4 The Chair has also had regular meetings with senior members of the Executive, most particularly the Vice-Chancellor & President, the Senior Vice President (Operations), the Vice-President (Finance), and the Director of Strategy, Planning and Analytics.

2.5 During the year, the Committee has continued to engage with members of senior management regarding specific risk themes and topics at each of the three meetings during the year. In this regard, the cyber security sub-group of ARCC has met twice during the year (October 2022 and March 2023). The Enterprise Risk Management sub-group has convened three times during the year (October 2022, December 2022 and July 2023).

2.6 The Committee has also had the opportunity to review the College's purchasing arrangements, in June 2023, 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 Prevent Duty, the UUK Research Concordat and legislation relating to Health and Safety and Equality, Diversity and Inclusion.

3. RISK MANAGEMENT

3.1 The ARCC has responsibility for reviewing the adequacy and effectiveness of the risk management processes of the University on behalf of the College Council. The improvement of processes for Enterprise Risk Management has been one of the main focuses of the ARCC in recent times. The Committee believes that the implementation of a Board Assurance Framework (BAF) in the 2023-24 year, which will align with some of the recommendations that are already anticipated from the Governance Review, will greatly enhance the scrutiny of risk management at the College. In the year under review, the Chair of the ARCC has put a great deal of effort into creating the right environment into which to introduce the BAF.

3.2 The Committee has continued 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 of 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. Whilst evidence of the growth of capacity within the University in this important area has not been as forthcoming as the members of the ARCC would wish it to be, the Committee remains engaged with management in the expectation that this will flourish in the next twelve months.

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 ARCC receives regular updates on this area of work from the Senior Vice-President (Operations) and the Chief Information Officer through reports to the main committee and also briefing sessions with the ARCC cyber-security sub-group. There is also now a dedicated information security assurance role in the Business Assurance team, and their work is now regularly reported to the ARCC, and they play a key role in providing an internal but independent view of the state of the security posture to the ARCC cyber security sub-group.

3.4 The Committee received a detailed update on the programme of work which is underway to strengthen the College's cyber security posture at its meeting in June 2023. The Senior Vice-President (Operations) assured the Committee that, whilst the College had made good progress in this area, there was a firm appreciation that it could never be complacent or be distracted from continual improvement. However, a certain amount of comfort could be drawn from the quality of the cyber security team, which was well resourced at the planned level and the significant amount of work which has been done to implement technical solutions, policies and improved governance around information security. The Committee noted that the major area which remained to be addressed is the culture and behaviour within the institution. The key parts of the strategy to improve the security posture were now focusing on awareness and training. The Committee agreed that the key risks are around retaining the high calibre of staff who had been recruited to this area, and in ensuring that the work to embed awareness and training throughout the

institution at an acceptable speed was appropriately resourced. Members noted that there had been great progress in recent years, but concerns remained that some significant immaturities, such as asset management control, still existed. The Committee has recommended to Management that over the coming year, the threat level should be clearly stated so that it can be understood, and the level of risk acceptance understood.

3.5   Another continuing area of significant focus for the ARCC has been on the management of risk in relation to capital programmes and projects. Following recommendations made in a 2021 audit review, which had been commissioned by the Chair of ARCC, the College has a more formalised management system for its portfolio of projects. A Director of Portfolio was employed to oversee this area, and she now has a standing item at each ARCC meeting in order to provide assurance on the progress of the College's numerous projects and programmes, and to report on the realisation of benefits from completed projects. In December 2022, the Business Assurance Department appointed an Associate Director of Project Assurance, who provides an independent internal programme of assurance reviews to support the Director of Portfolio in her work. The results of these reviews and benefits realisation assessments are reported to the ARCC at their conclusion. Taken together, these activities have improved the Committee's line of sight to the College's projects, both in flight and completed. In particular, the Committee has welcomed the continued development of the dashboard view of project risk, control and mitigation, which is presented at each ARCC meeting. This has allowed the ARCC to provide an improved degree of scrutiny over project risk on behalf of the College Council.

3.6   As part of its ongoing review of specific risk topics, the Committee received presentations from senior members of the College's management team for discussion on the following key areas at its meetings during the year:

- **Operational Risk Management**
  In November 2022, the Committee received a report on the processes which had been established for managing operational risk and supported the management of enterprise and portfolio risk. This process used 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 was being used to inform the capacity for College operations to support its strategic growth aspirations, and to assess new business against an established risk appetite. This would result in the College not taking on unnecessary levels of risk in the future. The creation of a framework also provided clarity around risk escalation and what should pass to the next level of risk management for consideration. In this way, the College hoped 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.

- **The Education Strategy**
  The Vice-President (Education) reported that the most challenging risk to delivering the Education Strategy was industrial action. He noted that the College had become quite acclimatised to industrial action and knew where the impact is likely to hit hardest. For many students there would be no impact, but those who were impacted felt the effects badly. It was noted that there were a number of emergency measures within the academic regulations to allow students to be graduated. Another significant risk was the over-reliance on one country for the recruitment of overseas students. There was an increasing need to diversify the cohort of international students. It was noted that King's was typical and in-step with other Russell Group universities at all in this respect. The College was not complacent and were working proactively to mitigate the risk. It was noted that some parts of the transformation had already been delivered, such as the launch of the new King's App, the provision of inexpensive hot food in response to the current economic climate and the increases to bursaries. Members concluded that a dramatic reduction in overseas students would impact the College's ambitions very seriously but noted that market intelligence suggested that this is an unlikely outcome. There was, though, a pressing need to diversify the cohort. Management reassured the

Committee that it knew what levers it would pull if there was a dramatic drop off in overseas applications, because this scenario had been stress-tested during the COVID pandemic.

- **Risks to Delivering Strategy 2026**
  The ARCC noted that the development of the strategy was informed by the growing understanding of risk in the College, particularly those risks relating to student experience, staff engagement, and government policy. A risked-based interrogation of the requirements of the strategy had identified these as the main focus and had resulted in a number of dynamic conversations based on risk profiles. Mitigations had been appropriately discussed for each risk and it was noted that the College was in the process of establishing whether they could be properly resourced. Management acknowledged to the Committee that new risks will arise which will require the formation of a new plan to identify controls or mitigations. The ARCC noted that a contemporary example was the Carbon Commitment to reach net zero by 2030, which may not be achievable if the College wanted to fully resource other parts of the strategy. Other key risks which management identified for the Committee were the availability of sufficient staff of suitable quality and the amount of leadership and organisational bandwidth required by an ambitious programme of strategic development. The ARCC continues to scrutinise the management of all these key risks but is paying close attention in particular to the risks which management articulated around the Carbon Reduction Plan.

- **Freedom of Expression**
  The Committee was assured by management that they took this matter very seriously and a recent review of the area has assessed the governance around this area to be basically sound, but emerging legislation may require a further tightening up of governance processes. The ARCC noted that a key part of the management of this area was the Freedom of Expression Standing Advisory Group (FESAG), and its operations sub-group, which ensured that any lawful subject could be discussed on campus safely, whilst protest against that discussion could also be expressed safely and within the law. The Committee learnt that student events were covered by KCLSU guidance and policies, but the College has an overarching responsibility because events took place on College property. However, it is crucial that the policies of the College and the Students' Union align completely. The review for the ARCC has identified the need for an increased level of awareness of the principles of freedom of expression amongst students and a need to have a shared understanding of definitions. The Co-Chair of FESAG noted for the Committee the important of ensuring shared ownership across all members of the College community and that it should not just rest with FESAG to be a policing group. The increasing reach of social media was also discussed, and it was agreed that this should be included in the focus of any further work done by the College on freedom of expression. It was agreed that a line should be added to the Compliance Assurance Map, which is provided on a termly basis to the ARCC, to report on the management of freedom of expression. Overall, the ARCC was assured that the College's approach to this issue compared well to that of other universities, particularly those who had been in the news for significant disputes which had blown up over freedom of speech or academic freedom. King's is trying to position itself as a thought leader in the subject and was working currently with the Universities of Melbourne and Chicago to establish agreed principles around freedom of expression and academic freedom.

- **International Business Risks**
  The Vice-President (international) described to the ARCC the processes for managing regular international business partnerships, including the due diligence process for potential partners, which is an essential input for the committee which ultimately decides on which proposals should go forward after assessing the amount of risk the College is taking on. The ARCC noted that the College was developing a framework to address the issues which arise from geopolitical events which pose a threat to King's. To demonstrate how these risks are managed, three scenarios were presented to the ARCC. The first scenario described the risks attached to undertaking research relating to countries which might retaliate, either in country

against the researcher's family, or directly against the College by restricting further interactions or discontinuing to send students to King's. The Committee understood that there was no single way to address this scenario and there were no easy answers, but the presentation did demonstrate that the College was alert to these issues and understood how to work them through when they do arise. Similarly, a demonstration of how commercial work was undertaken with companies which were unpopular with the UK government and some of its allies illustrated the same degree of difficulty, where the case turns on the particular facts. In this instance, management demonstrated that it had worked with the Home Office to come up with an appropriate solution, which suggested an ability to work through these issues sensitively with the appropriate authorities. The third scenario described a situation where an international conflict put the UK at odds with another world power, and there were knock-on effects through sanctions on students who were domiciled in that nation. The Committee noted that, in this instance, there would be a duty of care to staff and students from the region, as well as to other academic connections in the countries affected. The tension between compliance risk and reputational risk was also observed by the ARCC, as well as the fact that in such a situation there would be a common struggle in the sector to come up with the most appropriate response. Members learnt that the framework for managing such situations was being developed by management and that an anticipatory capability for geopolitical shocks was being built. Academic freedom was considered to be at the heart of the matter. It would be a breach of academic freedom for the College to tell academics that they cannot do work in certain parts of the world, even though there may be very good risk management reasons for doing so. This is a very complex area. For this reason, the framework must be built on equality of treatment as far as possible but be able to operate in difficult idiosyncratic instances. The Chair of the ARCC has requested that updates on the development of this framework be provided to the Committee.

3.7   The opportunity to directly question risk owners about their chief challenges and, particularly, about their risk mitigation strategies continues to be greatly valued by members of the ARCC as a way of assessing the College's overall quality of approach to risk management.

4.   INTERNAL ASSURANCE PROGRAMME

4.1   The internal assurance programme for the 2022-23 academic year was set by the Committee at its June 2023 meeting, and was successfully delivered by the Risk Assurance team, which is now fully comprised of permanent members of staff for the first time since the COVID lockdowns.

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, six reviews which were undertaken as part of the Compliance Assurance Programme, five which were undertaken as part of the project assurance programme and two dedicated information security reviews.

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 2022-23 year (ARCC1123N).

4.4   The Business Assurance team continue to create a regular report for the Principal's Management Team (PMT) on all audit recommendations which are not fully implemented within their target dates. Each recommendation has a PMT member allocated to it, so that there is accountability at the most senior level. There is willingness at the senior team level to close the loop on these recommendations, but their closure often depends on a number of external factors. Nevertheless, the number of outstanding recommendations at any given time has tended to be lower this year than in previous years. At the November 2023 meeting of the ARCC, the focus of the report of the Risk Assurance team was on the auditors' follow-up activities rather than on the work which had just been completed. This reflects the Committees attention to the engagement of management

with the findings and recommendations of the auditors than the Committee's own interest in specific findings or recommendations.

5. EXTERNAL AUDIT

5.1 Ms Fleur Nieboer, from KPMG, reported the outcome of the annual statutory financial statements audit to the ARCC meeting on 07 November 2023. Ms Nieboer thanked the Finance team for their help and support in concluding the audit. She noted that there was still some testing still to do, but plans were in place to have that all finished by the end of the following week and that the final audit opinion would be ready in plenty of time for the Council meeting on 21 November 2023.

5.2 The focus for the audit has been on the key risks which KPMG had identified in their audit strategy presented to the ARCC meeting in June 2023. These were the valuation of post-retirement benefit obligations in the USS pension scheme, Revenue Recognition (particularly in relation to fraud risk related to research income) and the management override of controls. Other risks considered by the audit were going concern, use of funds, the valuation of land and buildings and climate risk. The auditors confirmed that there were no matters of concern, and they had no matters to raise with the ARCC relating to the principal audit risks.

5.3 The auditors made a small number of recommendations, none of which were deemed to be Priority 1 issues. The first related to the recovery of income and aged debt against older projects. The auditors had also identified a number of unsigned employment contracts, a risk around the lack of documentation for items which are to be capitalised, and a concern about the IT Disaster Recovery plan being out of date. These were all rated at Priority 2. A Priority 3 recommendation was made to remove the de minimis threshold for reporting related party transactions, to ensure that all third-party transactions are disclosed in the financial statements.

5.4 The auditors were able to confirm their independence and noted the other work which had been carried out by KPMG on behalf of King's. Members agreed that the ISA260 for the 2022-23 year should be recommended to Council for approval, along with the letter of management representation from King's to KPMG.

5.5 ██
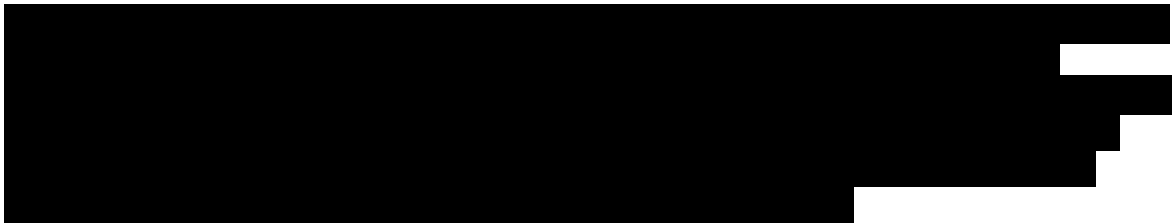
6. COMPLIANCE

6.1 A programme of Compliance Assurance Reviews was carried out by the Business Assurance Department during the year and a termly Compliance Report was presented to the ARCC at its November 2022 and March 2023 meetings. This report includes an assurance map for the management of compliance risk, which is created in close collaboration with management and is updated each term. The report and assurance map, when taken together, presents a rounded view of the compliance landscape from both a management viewpoint, and from an independent assessment presented by the review programme. During the year, Freedom of Expression was added to the Compliance Assurance Map, following the enactment of legislation relating to freedom of speech in higher education. A limited amount of horizon scanning is possible, and the Committee are aware of a number of emerging areas. Currently on the watch list for the Committee are the Foreign Interference reporting duty which is included in the National Security Bill progressing through Parliament and the Protect Duty (also known as Martyn's Law) which is also making its way through the legislature. The Committee is also awaiting developments around requirements for the College to report on its activities relating to environmental sustainability and will monitor compliance to any compulsory obligation to report.

6.2 The risk assessment which accompanies the report provides the Committee with a high-level view of the movement in risk in these areas and provides a good barometer of how legal and regulatory compliance is managed across the College.

6.2 The Committee paid particular interest to the updates provided by management on the progress of the Health & Safety Executive's (HSE) investigation into a case of occupationally acquired asthma at the College. This matter was eventually settled with the HSE through the College's successful implementation of a detailed action plan. Several other compliance-related internal reports were presented to the Committee during the year. These included:

- The management of requirements relating to export controls
- Attendance monitoring as a requirement of student visa sponsorship
- Compliance with the OfS Conditions of Registration
- Student democratic process requirements of the 1994 Education Act
- Global staff mobility
- The Public Sector Equality Duty
- The Prevent Duty

6.3 During the year, five Suspicious Activity Reports (SARs) were made to the National Crime Agency (NCA) by the Deputy College Secretary, who acts as the Money Laundering Reporting Officer for the College. These all included a request for a Defence Against Money Laundering (DAML) offences to be provided by the NCA, so that the College could return the funds to the card company or for funds to be moved to a charitable account within the College. In two cases the NCA requested more information and the College complied in order to obtain the DAML. A DAML was eventually assumed to have been provided in all five cases, and funds were moved accordingly.

6.4 The Chair of the ARCC has related the key points of these reports to the College Council for its consideration in his regular reports during the year. No serious adverse matters were reported to Council, with the single exception of the HSE investigation into a case of occupationally acquired asthma mentioned above.

6.5 Overall, the compliance landscape was considered to be well managed, despite challenges from regulatory change and an increased number of obligations on the College, particularly those which impact the way in which it works with overseas partners and collaborators. The Committee also notes that one area where an assessment of high risk has been accepted is data protection. This is because human nature will always play a key role, and so it is impossible to completely mitigate against the actions of an individual, whether malicious or benign, causing a data breach. Therefore, a high probability rating has been accepted by the College, although it continues to develop and implement policy and training to ensure that the impact of any breach is moderate.

7. 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 2023 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 The Committee noted that there had been a focus during the year on rationalising some arrangements in the College to bring greater efficiency. A number of other arrangements were still under consideration. One such area was the use of recruitment agencies, where the implementation of a framework has brought savings of around £4m. This was being achieved with a relatively small team in Procurement, and the Chief Procurement Officer suggested that this was

a risk to delivery, in terms of coverage by the team. To mitigate this risk, staff in local offices were being trained to be competent purchasers so that the requirement to more fully staff the central office was reduced. Thresholds for the intervention of the Procurement Office have also been increased so that the central office is not overstrained. Members found that a fair proportion of purchasing in the College was done away from the scrutiny of the Procurement team, but that was by design and a framework of controls, rules and thresholds operated around this process. It was observed that non-pay spending has still not returned to pre-Covid levels. Much of the College's expenditure is on research and members learnt that where savings are made in this area, they tend to go back to the funder and so the benefit is not directly felt by the College. Members questioned the CPO on how her objectives for the coming year were agreed, monitored and assessed for success. The objectives had been set in collaboration with senior members of staff, who had agreed them iteratively with the CPO, and the criteria for assessing whether the objectives had been met were largely constructed around feedback from those same senior members of staff. The SVP (Operations) noted that the objectives were further agreed and monitored through the planning process.

7.3   Members of the ARCC were generally assured by the evidence provided by the CPO that cost-cutting measures were being actively pursued within the College.

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 2023.

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 2022-23.

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 The ARCC has paid particular attention this year to cyber security and to the initial stages of implementation by management of an enhanced risk management framework. The Committee is pleased with the continuing programme of work being conducted by executive management on cyber and broader computer security across the College. The management of IT risk has continued to improve and there is good early planning to continue this progress by management with high aspirations. The relationship between the ARCC cyber subgroup and executive management seems to the Committee to be productive and appropriate.

8.10 Members of the ARCC continue to support the view that the whole governance of assurance at King's College London would be greatly improved and strengthened by the introduction of a Board Assurance Framework (BAF). A BAF would introduce a methodology by which members of Council could take a view on the accuracy of the assertions of the executive about its management of the key strands and pillars of the College's strategic goals. As such, it would be a key tool in the developing risk management capability of the College, and the framework will ensure that management of the key risks is being scrutinised in the right places and by governors with appropriate expertise. A properly implemented BAF would also support the identification of any gaps in the arrangements to achieve the strategic goals and would help management to close them before they threaten the achievement of those goals. For the executive, a BAF can also be used as a management tool to prioritise activity and to allocate resource appropriately. Following on from the governance review, the ARCC is pleased to note that support for the development of a BAF is coming from other committees and senior members of the Council.

Mr Paul Cartwright
Chair – Audit, Risk and Compliance Committee
King's College London
November 2023

Risk Topic: Risks to the Student Success Transformation Programme (*minute*)

The Programme Director for the Student Success Transformation Programme (SSTP) noted the ambition for the work, highlighting in particular its scale and complexity. A portfolio of such complexity and scale of organisational change comes with a high degree of uncertainty and, therefore, risk. This risk was further compounded by King's relative inexperience in delivering change at such scale, and an apparent lack of an effective and integrated approach to risk management.

The programme is currently in its inception phases. It has been working for a while in the background, undertaking deep dive reviews and undertaking gap analyses to understand existing and nascent risks. So far, a number of strategic risks have been identified relating to governance, resource, institutional change, and Financial as well as culture and behaviours. The SSTP will adopt a comprehensive risk and assurance framework, aligned to best practice approaches. This approach will:

- Attempt to identify risks as early as possible, appraise them at the start of individual projects and continually review them.

- Have clear escalation and delegation routes identified, where delivery teams will be accountable for understanding their primary risks and be empowered to mitigate them.

- Provide integrated and aligned risk management practices and processes, enabled by agreed criteria, guidance and tools, visibly integrated with corporate governance and controls.

- Focus on insight and action, reporting will maintain transparency across SSTP with a clear focus on mitigations and the adequacy of these.

- Use risk management to maintain progress in delivering SSTP outcomes.

The nature of this programme is very human-centric, so there should be recognition that the College will need to think differently. Culture change will be nuanced and subtle. It will not happen immediately and will take time to embed. The programme team recognised that they would need to thoroughly engage all stakeholders, so as to minimise the risk of failure.

The Programme Director stated that the team wanted to grow its resource internally, rather than bringing in consultants. However, it was noted that this would take time. Resource flexibility has been agreed with the executive team. This means that if there is a role which needs filling, the team will only look externally once all internal options to recruit had been exhausted.

The ARCC observed that a large number of risks had been identified as being high likelihood and high impact. The Programme team responded that this was not the first time they had encountered a series of projects with so much risk attached at the outset. They noted that it is impossible to eradicate risk completely and that risk management in transformation programmes is a team effort which needs to be embedded in the individual projects and across the programme. They expressed confidence that the risks would be mitigated successfully and that future assessments would consequently score them much lower. Mitigations would be monitored closely, and assurance processes would be adopted to evidence them working. These would be both internal and external and adopt an enterprise approach. The three lines of defence in this instance would be assurance processes internally at project and programme level and an independent layer of assurance, either internally at arms' length from the programme or externally procured. The Programme Director commented that the risks identified by the Programme team and presented to the ARCC all had clear mitigations set out and implementing these would be the starting point.

The Programme team were asked why the risk of stakeholders misunderstanding the scope of the work had not been identified when the remit and benefits of the work were not set out in the assessment of the programme. The Programme Director agreed and noted that, having gone through the process of building the business case, the programme team have experienced this lack of understanding first hand. It was agreed that there was a gap between the ambition in the business case and reality.   To overcome this, a programme dashboard was in construction which would be used to track and demonstrate the benefits. The expectation for assurance methodology was that it would be hybrid. The Programme team were looking to upskill staff internally so that eventually, when transformation turns into BAU, there will be internal skills present which can develop that much further and more quickly.

The Executive Director of SSTP noted that there is a tension between specificity and delivery. This means the programme will be very careful to assess the right moment to introduce the specificity. The business is engaged now in identifying what needs to be done so that confidence is not undermined. In essence, this meant that the programme was trying to resist too much specificity too soon in case expectations were mismanaged.

One member noted that the communication strategy should be considered as a priority, especially as current students may believe that they will see some benefit from this programme, even though they are unlikely to due to length of time it is likely to take to embed it. Communications should be used judiciously to manage expectations properly.

In response to a question concerning the right level of programme governance, the programme team commented that governance should be an enabler but so far it had felt like a constraint. The Programme team noted that they would welcome ARCC's advice on how governance might be used to best effect and suggested that this is an area where they could return to report further and discuss.

A member asked a question about whether the programme had identified whether there would be contingent benefits emerging from the programme. A number were expected. For example, it was not a central expectation that the programme would strengthen the College's cyber security posture, however, in reducing the number of spreadsheets used containing student data in order to streamline processes, there would be a contingent benefit to reducing the GDPR risk.

The programme team were asked how they will ensure that the projects use established King's methodologies, in a way that leaves skills in a better place at the University. It was noted that the programme is partly about cultural change but is also about cultivating that change. The programme is a proof of concept, but it will not work if it is only adopted by a few individuals. It needs to be embedded and there will be templates and methodologies left there after the programme is finished. Co-creation was at the heart of the programme, but there also needed to be penalties for non-compliance. It was envisaged that the programme will be the blueprint for any future thematic transformation or major change programme at King's, and there will be competitive advantage to King's becoming very good at continuous improvement in the future.

The Executive Director of SSTP confirmed to the ARCC that he believed the programme had the prerequisites it needed for success, although this was with the caveat that there was still a considerable amount of foundational and mobilising work to be done, so it was difficult to give that question a thorough assessment. It was also confirmed that there was alignment with the central Programme Management Office and the Director of Portfolio. The Programme was working with the PMO to develop a non-intrusive method of reporting and reports would flow back to ARCC. Ideally, these would be repurposed management reports. The Executive Director noted that he was used to running this sort of programme in collaboration with an existing and embedded central PMO.

The Executive Director also confirmed that the Programme had used the help of the PMO to review all currently known aspects of activity which fell within its scope. The ARCC noted that tactical and enabling

projects also needed to be under the banner of the Programme so that they get the appropriate bandwidth. The Executive Director confirmed that they had a view on everything which has been called a "project" at King's, but there may be some project work which has been labelled something else, like a "working group" or "steering group" which has not been picked up. The Programme was trying to assess that risk, but it was not quite quantified yet. The Executive Director said that he would try to have a quantified list of activities for ARCC to discuss at its March meeting.

These pages have been redacted

King's College Council

Meeting date	21 November 2023
Paper reference	KCC-23-11-21-9.4
Status	Final
Access	Members and senior executives

Report of the Staff & Culture Strategy Committee (SCSC)

Contents	Meeting at which considered	Consent agenda	Council action
1. Staff Survey	3 October 2023	Yes	Note
2. Student Success Transformation Programme	3 October 2023	Yes	Note
3. Role of the Committee	3 October 2023	Yes	Note

To Note

1. Staff Survey

The Committee received a full presentation of the findings of the staff survey, the priorities identified from the survey results, and an outline of the action plans to be developed both centrally and locally and commended Stephen Bach, Lorraine Kelly and all those involved in analysing the data so thoroughly in such a short period of time. The Committee agreed that there is much to celebrate: the response rates across the institution were extraordinarily good and many expressed pride in being part of King's and a desire to see it grow and improve. There were also some clear pain points identified. The executive team has developed a comprehensive plan to make progress – both from the centre and locally – and the Committee looks forward to ongoing updates as the plan develops and begins to be implemented.

The Committee urged that three words be kept at the forefront in the months ahead: pace, focus and measurement:

- *Pace* – It is important to continue to move at pace so that staff can see that actions are being taken in response to their comments. This especially important given the relatively low scores for the questions concerning belief in action.
- *Focus* – There needs to be central cohesion to the plans developed and executed locally to ensure full impact. Local plans and actions, led by line managers and divisional leaders are very important to address individual concerns. However, without a focused central response on matters affecting a wide range of staff, there is a risk of disaggregating the response making university-wide change difficult or invisible. The Committee noted particularly the importance of addressing from the centre the very deep concerns about bullying and harassment and concurs with the executive's view that this must be a high and immediate priority.
- *Measurement* -There must be a plan to measure impact. By the time of the next survey, if there is a list of actions undertaken but no sense of their impact then little will have been learned. Determining what to measure, when to measure it, and analysing the data to ascertain impact is critical for sustainable change and improvement.

2.   Student Success Transformation Programme (SSTP)

While very significant programme is aimed at dramatically improving the student experience, it is important to recognise that it will have a real impact on staff. Among those impacts will be changes to ways of working, process and some functional improvements. Many of these improvements will help staff as well as students. The Committee was pleased to learn that considerable thought is being given to a new way of carrying out this change programme. For example, the co-creation of changes, with staff from the central directorates and the faculties working in collaboration. There is also recognition of the true costs of doing the work and that adequate resources will be sought so that the project does not add to already heavy workloads.

3.   Role of the Committee

The Committee is keen to be a 'critical friend' as these projects move forward. We share the sense of excitement at the prospect of real change and also the need to balance against workloads and capacity. Receiving updates on progress with a regular cadence will allow the Committee to be a conduit for communication as well as to provide a resource on which the executive can rely for advice and input. Members were encouraged to contact the project leads around areas in which they would like to be involved.

Nhuoc Lan Tu
November 2023

Report of the Academic Board

Contents	Meeting at which considered	Consent agenda	Council action
1. GKT School of Medical Education Branch Campus **Annex 1**	1 November 2023	No	Approve
2. Ongoing Conditions of Registration for the Office for Students – Annual Report **Annex 2**	1 November 2023	No	Approve
3. Concordat Action Plan – Progress Update to UUK **Annex 3**	1 November 2023	No	Approve
4. Report of the College Education Committee	1 November 2023	Yes	Note
5. Report of the College Research Committee	1 November 2023	Yes	Note
6. Report of the Academic Board Operations Committee	1 November 2023	Yes	Note
7. Chair's Actions	1 November 2023	Yes	Note
8. Election of Associates of King's College (AKC)	1 November 2023	Yes	Note

To Approve

1. **GKT School of Medical Education Branch Campus** [Annex 1]

   Motion: That the establishment of the GKT School of Medical Education Branch Campus be approved.

   Background:
   The Academic Board recommends approval of the establishment of a branch medical education campus with the University of Portsmouth (UoP). The proposed campus will deliver the King's four-year Graduate Entry Medical (GEM) programme in collaboration with UoP and its clinical partners, primarily Portsmouth Hospital University Trust (PHUT). King's will also support UoP with its continued bid to establish its own medical school and will act as UoP's contingency partner until it has successfully progressed through all the stages of General Medical Council (GMC) approval. The first students will be recruited to start in September 2024.

2. **Ongoing Conditions of Registration for the Office for Students – Annual Report** [Annex 2]

   Motion: That the annual report on Ongoing Conditions of Registration be approved for submission to the Office for Students (OfS).

   Background:
   The Chair of CEC presented the annual report on Ongoing Conditions of Registration. As part of its monitoring of higher education providers, the OfS expects higher education providers to continue to meet ongoing conditions of registration, including any new conditions introduced since the initial registration process. The Academic Board recommends the report to Council approval and submission to OfS.

3. **Concordat Action Plan – Progress Update to UUK** [Annex 3]

   Motion: **That the progress report on the 2022-25 Action Plan Against the Concordat be approved for submission to UUK.**

   Background:
   The three-year action plan and reviews are to be reported to Council for approval on an annual basis, and then onto Universities UK for external scrutiny. The progress report should be read in conjunction with the action plan. The covering paper that precedes the report details the purpose of the document, the benefits of the action plan, and highlights three research staff priority areas:
   - Fixed-term contracts (a sector-wide issue)
   - Bullying and Harassment; and
   - Training and Resources for Managers.

   Discussion points among Academic Board members included:
   - Fixed term contracts and support for managers are intertwined topics. The real question is in providing appropriate advice to managers on how to manage promotion. It was felt that there is currently opacity in this area because it is very hard to find the information about advancement for research staff on the HR site.
   - The ways in which transfer requests to open-ended contract are reviewed following four+ years of continuous employment vary from one faculty to another. At the end of a fixed-term contract there are three outcomes: redeployment, reinstatement and redundancy. The working group is working toward a consistent approach to address both issues.
   - There had not been much specific training in the past for the management of research staff. Management of the redundancy process is not as clear as it should be and this would be addressed.
   - Academic Board members were urged to contact the Associate Director (Research Staff Development) if any other gaps were identified.
   - The College-wide survey of research staff against Concordat principles is currently in progress with an aim of developing a comprehensive set of data. It was noted that HR did not have the numbers on fixed-term contracts for research staff. Academic Board members were encouraged to encourage colleagues to complete the survey.

To Note

4. **Report of the College Education Committee**

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

   (i)   *4-Year LLB Programme Award Calculation* **(approved)**

   (ii)   *Proposal for new award: Master in Public Administration (MPA)* **(Confirmed via Chair's Action)**

   (iii)   *Terms of Reference and Membership 2023*

   (iv)   *Report of the Collaborative Provision Sub-Committee*

   (v)   *Overview of work in relation to current discussions about a new duty of care for universities*

   (vi)   *Revised death of a current student procedure*

   (vii)   *Student Success Transformation Programme briefing*

   (viii) *Race Equality Maturity Model*

   (ix)   *Module Evaluation: Overview of 2022/23 response rates and closing the loop rates*

   (x)   *Student Engagement & Attendance Monitoring Policy*

   (xi)   *Academic Misconduct Policy and Procedure (CEC: 22/23: 112) - updated*

(xii)   King's College London Marking Framework

(xiii)   Periodic Programme Reviews

(xiv)   Terms of Reference and Membership for the ASSC 2023/24

(xv)   In-sessional Project update

(xvi)   Schedules of Business 2022/23 – ASSC and CEC

(xvii)   Quality Assurance Handbook update

(xviii)   College Teaching Fund 2022/23: Final Report

(xix)   King's Staff 100: Learning Environments Panel Assembly report

(xx)   NSS and PTES Strategy

(xxi)   Artificial Intelligence (AI) Update

(xxii)   Update on the Start of the Academic Year 2023/24

(xxiii)   Professional, Statutory and Regulatory Body: Accreditation report from Health and Care Professionals Council (HCPC)

(xxiv)   King's Academic Skills provision

(xxv)   Report from Programme Development and Approval Sub-Committee

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

5. **Report of the College Research Committee**

Research Excellence Framework Process
The Board received an outline of what researchers could expect as the REF process got underway. REF2028 had a deadline of May 2027 and work would start earlier this time around. Two major changes had been suggested:
   •   around the weight of the components
   •   who gets returned and what outputs look like

Revenue to the University from REF was £81m per year for the next six years.

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

(i)   Update on Data Science, AI and Society

(ii)   Update on Research Impact Activities

(iii)   Update on Research Culture Activities

(iv)   Research Integrity: Generative AI in Research

(v)   UK/EU Horizon Europe Agreement

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

6. **Report of the Academic Board Operations Committee**

The Board agreed that members elected last year to academic staff seats assigned to PACE continue as members for 2023-24. In early September, it had been announced that PACE as a stand-alone unit was being dissolved and its individual departments realigned within the University. The Academic Board PACE members were all academic staff in the newly formed CIEL (Centre for International Education & Language).

The Board noted the following items from the Academic Board Operations Committee:

(i)   Academic Board Calendar of Business

(ii)   Academic Board Elections Update

(iii)   ABOC Membership

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

7. Chair's Actions

The Board confirmed the Chair's Actions taken during the summer/autumn 2023:
  (a)   Amendments to Student Terms and Conditions
  (b)   Temporary amendments to the Emergency Regulations to permit the President & Principal to establish special faculty-based boards (as may be determined necessary by the President & Principal) to scrutinise the results of individual assessments and approve the classification of and conferral of awards where regular processes have been unable, or members unwilling, to fulfil their remit and have not achieved fair and impartial treatment for students.
  (c)   Amendments to regulations regarding Faculty Assessment Boards and Assessment Sub-Boards (regular annual updates)
  (d)   Establishment of a Master of Public Administration Programme through the International School for Government

Copies of any of these are available from the College Secretary.

8.   Election of Associates of King's College

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

Professor Shitij Kapur, Chair
November 2023

The GKT School of Medical Education Branch Campus

1.0   Proposal

1.1   The GKT School of Medical Education requests approval to enter into a branch campus arrangement with the University of Portsmouth (UoP). The campus will be based on the Portsmouth site and will deliver the KCL four-year Graduate Entry Medical (GEM) programme in collaboration with UoP's clinical partners.

1.2   54 home places will be redistributed from the KCL five-year programme to the branch campus four-year programme, with the 54 home places traded for international places on the KCL five-year programme. The first intake of students will be in September 2024.

1.3   UoP will continue to work towards becoming an independent medical degree awarding body, aiming to take its first intake of medical students in 2028/29. At this time, recruitment to the branch campus will cease and existing students will begin to be "taught-out". KCL will act as the UoP medical school's contingency partner until it has successfully progressed through all the stages of GMC approval.

1.4   In the longer-term, the two institutions will explore activities and opportunities to embed their strategic partnership through a mutually beneficial, multi-disciplinary relationship which extends beyond medical programme.

2.0   Timeline

YEAR	KCL BRANCH CAMPUS	UOP MEDICAL SCHOOL
2023/24	**Phase 1: Development Phase**	
2024/25	**Phase 2: Delivery Phase**: • First intake of KCL branch campus students	• UoP completes GMC application process/new student numbers made available.
2025/26	• Second intake of KCL branch campus students	
2026/27	• Third intake of KCL branch campus students	
2027/28	• Fourth intake of KCL branch campus students • Graduation of first intake.	
2028/29	**Phase 3: Teach-out Phase:** • Graduation of second intake.	• First intake of UoP students • KCL starts acting as contingency partner to UoP. • UoP and KCL begin to develop research relationship
2029/30	• Graduation of third intake.	• Second intake of UoP students
2030/31	• Graduation of fourth intake. • Branch campus closes	• Third intake of UoP students
2031/32		• Fourth intake of UoP students • Graduation of first UoP intake. • KCL ceases acting as contingency partner.

3.0   Rationale

3.1   Portsmouth is in one of the most deprived areas of the country and is recognised as having a shortage of doctors. UoP has been developing its own medical school since 2019 but cannot gain government funding for UK medical student places without a new school bid which takes time and cannot be guaranteed to succeed.

3.2   The branch campus – based on a model established by Imperial College London and the University of Cumbria and in line with the Health Education England framework document *HEE Framework to support the redistribution of undergraduate medical student places into areas of workforce need (September 2021)* – will increase the generation of doctors in an under-doctored region and will acknowledge and reflect the particular health needs and challenges of the local area. It will also benefit KCL: it will enhance KCL's reputation; fit with King's Strategic Vision of making the world a better place; and – through the expansion of overseas student places - allow for diversification in FoLSM's overseas strategy.

4.0   Curriculum and Operation

4.1   The branch campus will use the KCL GEM curriculum, with some modifications to allow for the local context, mainly in the use of more community-based placements. Learning outcomes, assessment, academic regulations, and quality assurance will be provided by KCL. Clinical placements will be based primarily at Portsmouth Hospital University Trust (PHUT) which has experience of supervising medical students from the University of Southampton and will benefit from significant KCL faculty development and induction to the KCL programme.

4.2   The branch campus partnership will have no impact on KCL facilities. Students will have access to KCL online learning resources but will be based on the Portsmouth campus where facilities are already in place for a medical programme, including classrooms for small group teaching, OSCE and simulation suites. Portsmouth Hospital University NHS Trust (PHUT) which has facilities for students including a simulation centre, a library, and 12 seminar rooms and lecture theatres.

4.3   Teaching will be delivered predominantly by UoP/PHUT clinical academics/clinicians seconded to KCL and reporting into KCL Stage Leads via UoP-appointed Year Convenors. A part-time Programme Director has been recruited by KCL to provide academic leadership of operational delivery. They will sit within current KCL Medical Education Committee structures to ensure appropriate operational alignment and will work with a Deputy Programme Director, appointed by UoP and seconded to KCL. Administrative support will be provided by a combination of newly recruited UoP staff (based in Portsmouth), newly recruited professional services support in FoLSM, existing FoLSM staff, and KCL central services (with appropriate additional financial resource coming from the financial agreement with UoP). The majority of the administration will be provided within FoLSM to facilitate easy integration with KCL structures.

4.4   The students taking the branch campus four-year programme will be selected through KCL processes and from those applying to the KCL GEM programme in the standard way. In the first year, this will be from the existing pool of GEM students (many of whom also apply to the A100 programme and will be provided with the option of UoP GEM). The KCL GEM programme currently has approximately 25 students each year and approximately 50 applicants for each student place.
A Power BI analysis of overseas MBBS application numbers has confirmed that there are ample high-quality candidates to fill the 54 additional overseas places: between 2021/22 and 2023/24, application to offer ratios varied between 12: 1 and 18: 1.

5.0. **Agreements and Governance**

5.1   A Memorandum of Agreement between UoP and KCL will be signed in October 2023. It lays out the broad roles and responsibilities for the branch campus (the operational details of which will be worked through by the Workstreams) - including learning outcomes; academic regulations; assessment; and quality assurance - as well as covering the arrangements for IP; termination and branding.

5.2   A Steering Group has been established, chaired by Richard Trembath and including representatives from FoLSM, Global Business Development and Corporate Communications. A Communications strategy is being developed jointly by KCL and UoP which will involve key stakeholders including local NHS Trusts.

5.3   Once the development phase starts, the Steering Group will be replaced by an Oversight Committee and operational workstreams, all of which will include members from KCL, UoP and PHUT.

6.0   Business Case

6.1   Phase 1: UoP will pay KCL £750,00 for the development work in 2023/24.

6.2   Phases 2 & 3: Once delivery begins, there will be a 45:55 (KCL:UoP) revenue sharing arrangement wherein KCL and UoP split the tuition fee plus OFS income from the branch campus students.   In addition, KCL will benefit from the increased fee income from 54 new international places amounting to approximately £53m over seven years, and a contingency fee of £400k.

6.3   The total contribution before KCL overhead over the expected 7-year life of the branch campus is approximately £25 m.

6.4   KCL's Head of Taxation has confirmed that all payments are exempt from VAT.

7.0   Approvals

7.1   Internal Approval: The branch campus proposal and programme proposal have been approved by KCL Partnership Committee, PMM, UE and PDASC.

7.2   External Approval: The branch campus proposal requires approval by the Department of Health and Social Care and NHSE. A business case has been developed in collaboration with UoP and letters of support have been received from the Regional Postgraduate Medical Dean and the HEE's Deputy Medical Director (Undergraduate Medicine).

7.3   The GMC has been contacted about the branch campus programme and will confirm details of a quality review process and possible site visit during the development phase of the project.

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Date: 09/10/23

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

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 2022/23 (see appendix 2). Where applicable updates on previously reported KPI's[3] are included in the report.
- An update on the various consultations OfS have undertaken during 2022/23, including correspondence received by OfS during the academic year.

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, which may then lead to a fuller review being undertaken by the OfS. Additionally, the OfS may also impose a monetary penalty to a provider if it appears to the OfS that they are in breach of the ongoing conditions of registration. Depending on the severity of the breach, the OfS may also determine to suspend or deregister a provider[4].

Currently the OfS has been completing assessments at a number of higher education providers, which has not included King's, which can be taken as assurance that the OfS has determined we are meeting their Conditions of Registration. The assessments currently being undertaken relate to:

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

The OfS have also been undertaking thematic reviews, for example to address issues such as grade inflation (where there has been a sharp increase in the rates of students being awarded 1st and 2:1 degrees). The

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

recent publication from OfS on their analysis shows that King's in 2021/22 decreased its awarding of 1st and 2:1 and that our "unexplained" grade inflation was reduced to 9.5% (from 11.4% last year). While this shows a degree of post-pandemic recalibration, this is a high level when compared to data going back to 2010/11 (when it was -1.3% unexplained inflation) and this will remain a priority area of focus for the Academic Standards Sub-Committee.

While we may not have been the subject of any reviews, the OfS have contacted us, as part of sector engagement, regarding the following:

- their concerns over our "high levels" of recruitment of Chinese students, asking us to provide them with assurance of our contingency plans if these levels of recruitment were to drop significantly (May 2023) and
- asking us to provide them with information on the mitigations we had put in place for managing industrial action, specifically the marking and assessment boycott (June 2023). This was noted by the OfS to be information gathering rather than about any specific concerns they may have.

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[5] inputted into the following consultations during the year:

- Consultation on a new approach to regulating equality of opportunity in English higher education (Access and Participation Plans)
- Consultation on payment of fees for investigations
- Consultation on the de-designation of the Quality Assurance Agency for Higher Education as OfS Designated Quality Body
- Consultation on a new approach to regulating harassment and sexual misconduct in English higher education
- Consultation on the approach to publication of results of the National Student Survey
- Aggregate Offshore Record major review and Student record expansion England and Wales (run by HESA, the OfS Data Designated Body).

Section A: Office for Students Ongoing Conditions of Registration

The OfS regulatory framework[6] 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 2022/23 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	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 • Each higher education course is coherent • Each higher education course is effectively delivered and • Each higher education course, as appropriate the subject matter of the course, requires students to develop relevant skills.	Y	See appendix 2 for update on how this was managed during 2022/23
Condition B2: Resources, support and student engagement	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	Y	See appendix 2 for update on how this was managed during 2022/23

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates
	ii. Those students succeed in and beyond higher education.		
Condition B3: Student Outcome	The provider must deliver positive outcomes for students on its higher education courses.	Y	See appendix 2 for update on how this was managed during 2022/23
Condition B4: Assessment and awards	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[7]; 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 2022/23
Condition B5; Sector-recognised standards	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); • 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.	Y	See appendix 2 for update on how this was managed during 2022/23
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	The provider must demonstrate that in developing and implementing its policies, procedures and terms and conditions, it has given due regard to relevant	Y	See appendix 3 for update on how this was

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

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates
protection law	guidance about how to comply with consumer protection law.		managed during 2022/23
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 2022/23
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 2022/23
Condition C4: Student protection directions	Student protection directions[8] 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
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

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

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates
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

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates
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

General ongoing conditions of registration		Continue to meet condition of registration: Y/N	Appendix noting pertinent updates
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. Our Access & Participation Plan was therefore renewed for 2022/23. We will be reporting back on our APP expenditure versus investment forecast as part of the annual financial return in the autumn of 2023. Expenditure was in keeping with the forecast (~£12M). Following the 2023/24 admissions cycle, we are on course to meet or exceed all APP targets relating to fair access and reducing the gaps in entry between students from the most and least disadvantaged areas of the country.

Should any circumstances change during the academic year and/or subject to the monitoring completed for 2022/23, then the OfS can revisit this automatic renewal. If their view of the risk of meeting commitments has changed then they may be unable to approve the plan for a further year and a new plan would be required. This remains very unlikely.

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 approved and will carry into 2023/24.

A completely new APP will be submitted to commence in 2024/25. We expect OfS guidance on this in February 2024, with submission in spring 2024. Preparatory work will be underway in autumn 2023 focusing on three areas: refresh of what King's defines as 'widening participation', with associated metrics and targeting criteria; revisions to our approach to contextual admissions and offer-making given a more focused WP target; review of APP financial support (bursaries and hardship funds) to bring our provision up to date, making sure it is targeted based on the needs of students in 2024 (and beyond) given the changing external environment (e.g. cost of living, mental health). As part of this drafting, we will also scope regional/national focus of widening participation activity, and how activity joins up to deliver student success from pre-entry, application/enrolment, transition and students' onward progression to the best outcomes.

A new investment plan to achieve our stated aims will 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.

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 will be via a newly constituted Social Mobility steering group and to the university senior management for activity relating to Vision 2029 delivery and to Council for activity relating to academic policies and practice. Decisions on specific areas will be taken at the appropriate level. For example, changes to contextual admissions will be overseen by the Marketing, Recruitment and Admissions group in the first instance.

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.[9] If the OfS determine we are not meeting their benchmarks, or there is a concern in our meeting the conditions of registration, then there are a series of measures that the OfS may use. While it is assumed that we will not be required to hold a review in the immediate future regarding non-compliance with OfS conditions of registration, we 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 will be undertaken by the OfS and timescales are expected to be communicated to the College in the autumn term.

Following their announcement in July 2022, the QAA stepped down from the Designated Quality Body (DQB) role after the 31st March 2023. The OfS are currently acting as the DQB and are undertaking any quality and standards assessments. To help them undertake these assessments the OfS have recognised the importance of independent academic judgement and have therefore recruited a pool of independent academic assessors to help them form a regulatory decision about a provider's compliance with the OfS quality and standards conditions of registration. These academic assessors are expert practitioners drawn from a broad range of providers with varied subject specialist expertise. However, there is still unease felt with the OfS taking on this interim DQB role, which has been iterated in a recent House of Lords review of the OfS: [10]

> "It is not clear whether the OfS has or will be able to develop the capability to take on the DQB role smoothly. It is clear, however, that the OfS does not have the confidence of the sector in providing an impartial assessment of quality and standards. The current situation has the potential to be both impractical and a threat to academic independence"[11]. (Paragraph 239)

This unease stems not only from the ability of the OfS to undertake independent reviews, but that these reviews may still be seen by our international partners as a move away from European Standards Guidelines. It is hoped that with the House of Lords review and recommendations, the OfS will review its interim role as DQB and step down, reinstating the Quality Assurance Agency for Higher Education.

Following the substantial consultation undertaken in 2022 around the Quality and Standards Conditions of Registration a mapping exercise was undertaken to demonstrate how King's continues to meet these revised conditions, identifying any gaps and/or actions to be completed.[12] The following provides an update on those identified actions to be taken:

- The 2022/23 annual report to Council on how we continue to meet the OfS Conditions of Registration was extended to include all provision of the College, including Postgraduate Research and our validated partners (RADA and Inns of Court College of Advocacy). This current report also includes all provision of the College.
- A discussion was held at the July 2023 meeting of the Programme Development and Approval Sub-committee regarding co-delivery of modules where teaching of two different levels of modules are combined. It was agreed that the best practice is to separate the teaching of the different levels

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[9] https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports/King-s-College-London

[10] https://publications.parliament.uk/pa/ld5803/ldselect/ldindreg/246/24602.htm

[11] https://publications.parliament.uk/pa/ld5803/ldselect/ldindreg/246/24612.htm#_idTextAnchor195

[12] This mapping exercise was reported to the Academic Standards Sub-Committee (paper ref: ASSC: 21/22:77) and College Education Committee (paper ref: CEC: 21/22: 110) in June and July 2022 respectively.

and for those programmes who are still co-delivering teaching this should be revisited at the earliest opportunity.

- Periodic Programme Reviews recommenced (having been paused during the pandemic) in 2022/23 and those aspects identified to be included in reviews has been added to the guidance document on how to conduct these reviews.
- Discussions around our grade profiles has been had at Faculty Assessment Boards and the Academic Standards Sub-Committee and these profiles are being kept under review.
- The reference regarding keeping student assessment for 5 years+ is still being deliberated by the OfS. A Task and Finish Group was established to review this requirement in March 2023, and we await the result before we consider what action we may need to take.

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 2022/23 demonstrates this commitment to continue to meet the conditions of Condition B: Quality and Standards for all students:

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 students in their chosen subject.

During the year the OfS announced a review of blended learning and in October 2022 the review report was published and the OfS issued a report outlining their regulatory views based on the findings of the review. A summary of the report was considered by the College Education Committee (paper ref: CEC: 22/23: 81) along with recommendations including programmes which have blended learning to consider the review report when undertaking programme reviews. Additionally, for the Student Consumer and Protection Board, reporting to the Programme Development and Approval Sub-Committee, to review the information published on prospectus webpages and CMA sheets to ensure appropriate information is being given to students. This was discussed at the May 2023 meeting of the Board and the marketing team were to confirm their awareness of this requirement from OfS going forward (paper ref: SCPB-2023-05-22-2M).

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 comprehensive procedures, policies and regulations provide a checking mechanism that our taught programmes (including apprenticeships) have this high-quality academic experience e.g. programme approval process with external input, annual monitoring, periodic programme review (with external input), external examiners. Programmes that are accredited by PSRBs will also have this checked via their re-accreditation visits/submissions, which are reported to College Education Committee.
- 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.
- Our College Marking Framework includes marking criteria that covers "technical proficiency in the English language" and our expectations, noting *Generic/Transferable Skills including Professional Competencies Employs a range of enabling skills and competencies, including:* effective communication in a range of multi-media formats (including structure, accuracy of grammar and awareness of audience/genre within discipline-specific outputs). Additionally, we have high admission requirements for English language for all our programmes.
- There is also a system in place to identify students with certain learning disabilities that may be impacted by this condition. Where students have self-declared with these learning disabilities, markers will then take this into consideration when they mark.

During 2022/23 the following work around education, to help provide our students with a high-academic experience and enable a student's achievement to be reliably assessed in future year, were reported to College Education Committee and Academic Board (where appropriate):

- Strategy 2026 was developed with the following 4 goals: Enabling Student Success; A Thriving King's Staff Community; Sustainable Research and Innovative Education; and Knowledge with Purpose: Service and Impact. To help with this the Student Success Transformation Programme (SSTP) has been reviewed and the proposed approach for the SSTP work went to Council in June and September, with the full proposal going to their meeting in November 2023. The two areas the SSTP are looking to address are: 1. Student experience gaps. 2. Systematic organisational barriers to student success.
- Flexible curriculum: an update was provided at the March 2023 meeting, providing information on the key-stone modules and noting that an Interdisciplinary Education Project Board had been established to have oversight of the progress of the flexible curriculum.
- King's First Year: a decision was made in May 2023 to pause the work on King's First Year. While the module had been launched in 2022/23 the student engagement with the module declined as the year went on. Feedback was sought from students, and while those who continued to engage with the module found the teaching excellent, concerns raised by the students regarding the module being in addition to their 1st year studies, not being included in the degree classification, and not being linked to their subject area meant a decision was made to pause the module while a review is undertaken, with lessons learned to be aligned with the flexible curriculum project.
- The new UG progression and award regulations were implemented for first year students. The year has been spent in making necessary changes to the student record system (SITS) to make these regulations automated in our systems. A new Assessment Sub-Board "assessment booklet" was devised for King's Business School and the Faculty of Life Science and Medicine to pilot in assessment period 3 and lessons learned are now being reviewed.
- An interim report was received on the practice and resources of personal tutoring across the College (paper ref: CEC: 22/23: 73), focussing primarily on Undergraduate provision. Included in the report was the pilot being undertaken by King's Business School who have employed two UG Faculty Tutors who sit within the Student Experience team. These are not academic roles, and they are not involved in teaching team but they are "tutors" in the sense of engaging directly with students on all non-academic matters.
- A working group has been established to review our policy and practices around mitigating circumstances. The work of the group is continuing into 2023/24, but considerations to date have included the use of evidence for specific circumstances and updating staff and student guidance for 2022/23.
- An update was provided on the Inclusive Education Strategic Plan 2022 – 2026 (paper ref: CEC: 2223: 80) outlining the vision and mission for the work of the next four years, along with key priorities and specific activities to be undertaken.

- Discussions have been held during the course of the academic year regarding the development of AI technology (specifically ChatGPT) and Academic Board established a working group led by the Vice Principal Education and Student Success and Executive Dean of Dickson Poon School of Law to review this technology and how King's can best use it. A separate working group has been established under College Education Committee, being led by King's Academy, looking at producing some guidance to staff regarding possible approaches to be used.
- Approved a Social Mobility and Widening Participation Strategy 2022 – 2025, which set out how King's will achieve its Access and Participation Plan targets (paper ref: CEC: 22/23: 31).
- A proposed approach to improved learning environment was discussed at the May meeting of College Education Committee (paper ref: CEC: 22/23: 95). A set of learning environment principles were put forward for discussion and updates will follow at later meetings.
- Updates to policies around Support for Study, Student Engagement and Attendance, and Admissions were also put through for approval during the academic year.

For research degrees, during the pandemic online viva examinations were introduced. The Research Degrees Examination Board (RDEB) agreed in June 2022 that the option for online and hybrid examinations should remain to offer as much flexibility as possible. Face-to-face examinations are on the rise fully remote examinations had decreased. Hybrid examinations are used in emergencies. To ensure compliance supervisors are still required to complete the oral examination consent form before online or hybrid viva can take place.

Student's Academic Experience
Students' academic experience is monitored by King's via student surveys, including the National Student Survey, Postgraduate Taught Experience Survey and Postgraduate Research Experience Survey. The following outlines the response we had with these student surveys that ran during 2023:

National Student Survey (NSS) 2023
The NSS underwent a review prior to the 2023 survey being launched, resulting in a different format which has led to significant changes in both the survey design and the publication methodology. The most notable changes in design include:

- the removal of the overall satisfaction question,
- the introduction of new questions on freedom of expression and mental wellbeing services, and
- the use of direct questions which no longer include a 'neither agree nor disagree' option.

These changes have meant latest results cannot be comparatively compared to previous years, however, to try and contextualise the results, the changes in King's position relative to the Russell Group and the sector has been assessed.

From the results, the following is noted:
- Our position in the Russell Group remains unchanged at 19th place.
- Our average positivity score is 75%.
- Teaching and Learning and Learning Resources continue to be areas of strength for King's.
- Academic Support has seen a positivity score of 81%: a significant uplift relevant to the sector.
- The new question concerning Freedom of Expression showed that 83% of our students feel free to express their ideas, opinions, and beliefs during their studies.
- King's remains below the sector average for each section of the survey, however in the majority of cases the negative variance has reduced indicating a closing of the gap.
- The Faculty of Nursing Midwifery and Palliative Care has shown particularly strong improvements relative to both the Russell Group and the wider sector.
- Organisation and Management and Assessment and Feedback remain low performing areas at 67% and 68% positivity scores respectively.

- Organisation and Management however has reduced its score against the sector from 9% to 4% difference. Likewise Academic Support has reduced from 8% behind the sector to 3%. In contract, the gap between King's and the sector for Assessment and Feedback remains largely unchanged at 10%.
- The comparison between King's and the Russell Group shows King's tending to be 2 – 3% below the Russell Group average in each section. Organisation and Management has more significant variance at 7% below the Russell Group average.
- Three faculties (King's Business School, Law, and Institute of Psychiatry, Psychology and Neuroscience) have exceeded the sector average, and six faculties have exceeded King's average (King's Business School, Law, Institute of Psychiatry, Psychology and Neuroscience, Social Science and Public Policy, Nursing, Midwifery and Palliative Care and Arts and Humanities).
- The Faculty of Dental and Oral Craniofacial Sciences continued to be the faculty with the lowest results but the score in absolute terms has increased, although the move to a four-point scale has helped in this regard.
- Nursing, Midwifery and Palliative Care achieved the biggest improvement of any faculty moving a couple of percent above the university average, whereas last year it was quite significantly below.
- The Faculty of Life Science and Medicine had been steadily improving its NSS score over recent years, but unfortunately has fallen back in the most recent results.
- The Faculties of Arts and Humanities, Natural, Mathematical and Engineering Sciences, and Social Science and Public Policy has remained pretty much unchanged compared to last year.
- The variation in faculty scores is most notable in the sections on Organisation and Management and Student Voice. For Organisation and Management scores range from a high of 87% down to a low of 20%. The highest scoring faculty in this section was King's Business School, which was 11% than the second placed faculty. Student Voice results range from 77% to 38% but there is more of a cluster of high results, with three faculties achieving a positivity score above the sector average.

Institution level NSS results have tended to be distributed within quite a narrow range, meaning that a small percentage change could have a significant impact on an institution's ranking. The distribution of results is even more compressed in the latest results, with 8% separating the top ranked Russell Group institution (Warwick with 83% for its average question score) and the bottom ranked Russell Group institution (Edinburgh with 75%).

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

The data provided by the OfS introduced summary of results by theme as follows:

Theme 1: Teaching on my course
Theme 2: Learning opportunities
Theme 3: Assessment and Feedback
Theme 4: Academic Support
Theme 5: Organisation and Management
Theme 6: Learning Resources and
Theme 7: Student Voice

Each theme was given an overall positivity measure, a benchmark and whether we were above, inline or below that benchmark, as follows[13]:

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[13] None of our results meant we were above the benchmark

Theme 1: 83.3% overall positivity result against a benchmark of 84.1%, resulting in us being broadly in-line with the benchmark (99.9%).

Theme 2: 77.7% overall positivity result against a benchmark of 80.5%, resulting in us being in-line with the benchmark by 34.6% but pre-dominantly below the benchmark (65.4%).

Theme 3: 68% overall positivity result against a benchmark of 73.7%, resulting in us being completely below the benchmark (100%).

Theme 4: 80.6% overall positivity result against a benchmark of 82.7%, resulting in us being broadly in-line with the benchmark (77.3%%) but 22.7% was below the benchmark.

Theme 5: 66.7% overall positivity result against a benchmark of 72.3%, resulting in us being completely below the benchmark (100%).

Theme 6: 85.1% overall positivity result against a benchmark of 86.7%, resulting in us being broadly in-line with the benchmark (94.9%).

Theme 7: 66.5% overall positivity result against a benchmark of 71.6%, resulting in us being completely below the benchmark (100%).

The highest scores received in individual questions were:
Q1: How good are teaching staff at explaining things? 89.7%
Q20: How well have the library resources (e.g., books, online services and learning spaces) supported your learning? 89.2% and
Q3: How often is the course intellectually stimulating? 87.3%

The lowest scores received in individual questions were:
Q14: How often does feedback help you to improve your work? 60.2%
Q17: How well organised is your course? 64.4%
Q10: How clear were the marking criteria used to assess your work? 65.5%

This is demonstrating, for another year, how poor our students experience is relating to assessment and feedback and organisation and management, and while the Student Success Transformation Project and the assessment project to be undertaken in 2023/24 will help with these areas of poor performance, the expected results of these projects will be a few years before we see an expected uplift in NSS results.

Postgraduate Taught Students Survey (PTES) 2023

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

The 2023 PTES results show an increase in satisfaction over the previous years, with Overall Satisfaction increasing by 2% to 83% from 2022, and 12% from 2021. After the significant drop in the 2021 results, for both King's and the Russell Group more generally, satisfaction levels largely recovered last year. The latest results show satisfaction increasing further for the majority of faculties and across significant sections of the survey including Teaching and Learning, Engagement and Skills Development.

There have been some decreases in satisfaction compared to last year, with the biggest drops seen in the sections on Assessment and Feedback, and Dissertation or Major Project, with both decreasing by 2%.

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

There continues to be some substantial gaps in satisfaction between different demographic groups, although in a number of cases the gap has narrowed quite significantly compared to the last two sets of results.

The gaps in Overall Satisfaction are most significant when looking at disability (6% in the two-way split) and ethnicity groups (16% in the nine-way split). Six of the faculties saw an increase in Overall Satisfaction and an increase in the average score across all survey questions compared to last year. Four faculties achieved an increase of 5% or more in Overall Satisfaction – Arts & Humanities, Faculty of Dental and Oral Craniofacial Sciences, Law, and Institute of Psychiatry, Psychology and Neuroscience, and for the third year in a row King's Business School had the highest level of Overall Satisfaction and achieved the higher satisfaction rate in seven of the other nine survey sections (with Faculty of Nursing, Midwifery and Palliative Care topping the other two – Assessment and Feedback and Resources and Services).

Results by faulty and survey section continue to show some significant variance, none more so than the sections on Assessment and Feedback, and the new section on Community. However, greater uniformity is seen in the faculty results for Teaching and Learning, Resources and Services, and Dissertation or Major Project.

Three faculties achieved an increase in satisfaction rates across every section of the survey (Arts & Humanities, Faculty of Nursing, Midwifery and Palliative Care and Institute of Psychiatry, Psychology and Neuroscience). The biggest increases were seen in Institute of Psychiatry, Psychology and Neuroscience where Skills Development, Organisation and Management and Overall Satisfaction each increased by more than 8%.

The individual questions with the highest satisfaction rate tended to come from the Teaching and Learning and Resources and Services sections, with the top three scoring questions including "Staff are enthusiastic about what they are teaching" with 91% and "Staff are good at explaining things" at 90%.

The questions with the lowest satisfaction related to the Students' Union, although the most common response was "neither agree nor disagree".

The questions with highest percentage of respondents actively disagreeing tend to relate to the Community section. The question with the highest disagree rate was "there have been sufficient opportunities to interact with other PGT student" with 25% disagreeing.

The Resources and Services section, which went from being the lowest scoring area of the higher in last year's results, continues to be the area with the highest level of satisfaction. Teaching and Learning results continues to be an area of comparative strength having consistently been one of the two top sections in the survey over the last five/six years.

This year's PTES saw the introduction of a new section on Community, with the questions covering similar areas to those in the NSS Learning Community section. The satisfaction for this new section is very low at 58% (which is close to the 2022 NSS figure of 62.8%). Whilst the low satisfaction reflects that a comparatively high proportion of respondents are selecting neither agree nor disagree, these are also the questions with the highest proportion of respondents actively disagreeing with the statement.

Postgraduate Research Experience Survey (PRES)
The Postgraduate Researcher Experience survey take place every two years and is the only national survey. The survey has questions grouped into 'themes' asking questions covering the full range of the research student experience.

- The 2023 PRES Survey, with the responses of 1667 research students giving a response rate of 43% (the highest response rate achieved for the survey since 2015), show an increase in overall satisfaction (+4%) from 80% in 2021 to 84% in 2023.
- Satisfaction has broadly increased for the majority of survey themes including Supervision, Resources and Services, Professional Development, Supervision and Support. The most significant increases were for Resources and Services (+5%) and Professional Development (+3%).
- Some themes have shown decreases with the most significant being the Progression theme (-2%) and Responsibilities (-3%).
- King's response to 'As a result of my research degree programme I feel better prepared for my future career' at 81% is well above the Russell and London grouping averages.

PRES benchmarking summary

It is important to note with the benchmarking data that King's 2023 response rate is significantly higher than the average response rate for the two groups we requested benchmarking against, the Russell Group and London grouping.

King's College London	Global	Russell Group	London
1671	37661	19732	9425
3888	124728	68943	26478
43.0%	30.2%	28.6%	35.6%

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Key areas to improve and next steps
For Centre for Doctoral Studies

- It is clear that there is space for improvements in the content and structure of the induction, especially to include more explanation of and scope for some additional information events for those later in their course about the processes and procedures around submission and final examination. Look to see if there is additional information that would be useful for students who are new to research to have at the start of their course such as those from minority groups.
- Look at identifying any gaps in the current training programme, such as around data science training, and add or modify courses to include this.
- Review the supervisor masterclasses to look if there is space to discuss managing groups and ensuring that supervisors are holding discussions about students skill development and how to find details of what is available.
- Look to hold additional feedback sessions with focus groups of students to discuss what actions or activities would most improve the PGR community. Is this a question of needing space or encouragement for students to work on campus with associated activities taking place, more flexible or hybrid activities to better include PT students.
- Review how disabled students access support and whether core activities such as training are as accessible to all students as possible.

For faculties/schools/departments

- Review procedures for students reporting issues with staff and ensure that students are clear on how to do so, what the processes are and that students are not making a decision about attempting to cope with unacceptable behaviour from staff in order to avoid impact on future careers.
- Look at how research activities are being structured and whether this is making it harder for PT and disabled students to be included.
- Look at what guidance is available for upgrade process and final submission (and guidelines on formatting).

Validated partners

When considering survey responses from our validated partners, we can report the following:

NSS 2023:

The data provided by the OfS introduced summary of results by theme as follows:

Theme 1: Teaching on my course
Theme 2: Learning opportunities
Theme 3: Assessment and Feedback
Theme 4: Academic Support
Theme 5: Organisation and Management
Theme 6: Learning Resources and
Theme 7: Student Voice

Each theme was given an overall positivity measure, a benchmark and whether we were above, inline or below that benchmark, as follows:

Theme 1: 92.4% overall positivity result against a benchmark of 88.7%, resulting in RADA being 59.5% above the benchmark, 29.8% in line, and 10.7% below the benchmark.
Theme 2: 89.4% overall positivity result against a benchmark of 85%, resulting in RADA being 63.9% above the benchmark, 25.8% in line, and 10.3% below the benchmark.
Theme 3: 81.1%% overall positivity result against a benchmark of 82.4%, resulting in RADA being 27.2% above the benchmark, 30.9% in line, and 41.9% below the benchmark.
Theme 4: 91.7% overall positivity result against a benchmark of 87.4%, resulting in RADA being 63.4% above the benchmark, 27.4% in line, and 9.2% below the benchmark.
Theme 5: 45.8% overall positivity result against a benchmark of 68%, resulting in RADA being 99.6% below the benchmark.
Theme 6: 64.8% overall positivity result against a benchmark of 78.3%, resulting in RADA being 95.4% below the benchmark.
Theme 7: 70.4% overall positivity result against a benchmark of 72.4%, resulting in RADA being 25.4% above the benchmark, 27.1% in line, and 47.4% below the benchmark.

The highest score questions were:

Q01: How good are teaching staff at explaining things? (100%)
Q15: How easy was it to contact teaching staff when you needed to? (97.2%)
Q13: How often have you received assessment feedback on time? (97.1)

The lowest score questions were:

Q19: How well have the IT resources and facilities supported your learning? (37.1%)
Q17: How well organised is your course? (44.4)
Q18: How well were any changes to teaching on your course communicated? (47.2%).

Some of these low results were also experienced last year, and at the annual meeting on 24th March 2023, discussions were had on what could be the reasons behind these results and action to be taken, with the following noted:
- A review of the assessments was being undertaken as they had simplified the method of providing feedback and acknowledge that there may not be enough detail provided for students.
- Their resources, including IT, is a big problem for them as it was difficult for the institution to purchase and maintain equipment, since their budget is focused on teaching. They have now started to set up depreciation tables to track how and when equipment is maintained and ensure funds are in place to replace equipment where required. They have to acquire finance through industry to support their resourcing requirements and although they had managed to replace some student equipment and computers, they had ongoing issues with Wi-Fi access, and they were still recouping losses incurred during the pandemic, so were cautious about spending money. However,

they were putting in place a business growth plan for the next five years that they hoped would help them to manage these financial demands.
- There was reflection on the changes to staffing at senior management level and timetables had impacted their scoring in the previous year in the NSS survey results, with the Technical students experiencing a period of instability because of staffing. It looked in 2022 as if this has continued, but they were reviewing the situation including increased dialogue with students that they noted had been appreciated by the students and changes to the programme structure and delivery of the technical programmes.

During the periodic programme review RADA are due to hold during 2023/24 these NSS results and what action (if any) is being taken in light of them will be discussed, but it should be noted that RADA's cohort is relatively small so may have some impact on the results.

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

PTES 2023
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[14]:
- Personal tutors
- Supervisors
- Learning support via the library, disability team, including consideration of personalized examination arrangements
- Pre-sessional courses to aid with improving academic English language
- Careers and Employability
- Mitigating circumstances process
- Feedback policy
- For international students a student support service is available to them
- The widening participation team provides support to potential students who face barriers to enter higher education by equipping them with relevant skills
- IT resources
- Study spaces
- Centre for Doctoral Studies (PGR support)
- Research Skills Development team (PGR)
- Processes for managing student misconduct cases.

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

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 RADA, their next periodic programme review is to be held in 2023/24.

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 its references on resources and support available to students and assurance can be given that King's covers the following examples cited by OfS:
- "academic misconduct" includes presenting work for assessment that is not work of the student being assessed and includes but is not limited to the use of services offered by an essay mill. This is covered by the Academic 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 produces a set of indicators that providers are required to meet to demonstrate them meeting this specific condition of registration (the indicators relate to continuation, completion, and progression (that is students going into managerial and professional employment or higher-level study). The OfS make a judgement that a provider has achieved positive outcomes for its students, if the provider's outcome data for each of the indicators and split indicators are at or above the relevant numerical thresholds set by the OfS. If a provider's outcome data is not at or above the numerical thresholds, the OfS will consider whether the context in which the provide is operating nevertheless justifies the provider's outcomes, in that they nevertheless represent positive outcomes for its students.

The OfS evaluates provider performance against the threshold values to determine they we are meeting registration condition B3, and undertakes thematic reviews based on the dashboard and during 2022 and 2023 twenty higher education providers were picked to review their outcomes against[15] – King's was not part of the sample picked for 2022 as our outcomes were above the numerical threshold in this thematic review, and we have yet to hear about the 2023 thematic reviews:

2022

Student Outcomes measures	Continuation Completion Progression
Mode of Study	Full Time
Levels of study	First Degree Postgraduate Taught Masters'
Specific split indicators to be used	Subject: Business and Management Subject: Computing Subject: Law Subject: Psychology Subject: Sociology, anthropology and social policy Subject: Sport and exercise sciences Subject: History and archaelogy

2023

Student Outcomes measures	Continuation Completion Progression
Mode of Study	Full Time
Levels of study	First Degree Other undergraduate
Specific split indicators to be used	Other undergraduate: Level 5+ Other undergraduate: Level 4 First degree with integrated foundation year, subject to updated analysis of performance before the next assessment cycle Specific split indicators relating to student characteristics, to be decided following outcomes of the OfS's consultation on access and participation plans Specific split indicators relating to subject, to be decided following updated analysis of performance before the next assessment cycle

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

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[15] Prioritised categories for the 2022 and 2023 assessment cycles (officeforstudents.org.uk)

Link to periodic programme reviews

In 2022/23 the College introduced a revised process for periodic programme reviews. Currently, 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 reports 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. However, at the October 2023 meeting of College Education Committee, a discussion was held on NSS/PTES strategy and further deliberations on how to manage early interventions are to be held, as it is deemed that the College would unlikely fall foul of the OfS B3 Student Outcomes metrics, so how we should manage NSS/PTES results needs further consideration.

For 2022/23, analysis was undertaken following the publication of the Student Outcomes dashboard and was shared with the Vice Principal Education and Student Success in February 2023, noting the following:

- King's is above or in line with OfS thresholds and weighted benchmarks for all student outcome measures across all full-time levels of study.
- All full-time subject areas are also above or inline with threshold values.
- 8 full-time subject areas (from various levels of study) are below their weighted benchmark.
- For part-time students, King's is above or inline with OfS thresholds and weighted benchmark for all levels of study except Other Undergraduate[16].
- Part-time Other undergraduate students are below the threshold for continuation and below the weighted benchmarks for continuation and completion – this is due to the HESA reporting mechanism for these programmes rather than being a concern.
- Four part-time subject areas are below the OfS threshold and one subject area is below the weighted benchmark.

Considering the above information, the Vice Principal Education and Student Success agreed that a meeting was not deemed necessary to be held for this academic year, but would be held in 2023/24, once the data has been refreshed and comparisons would be able to be undertaken.

Validated partners

Regarding King's validated partners, the dashboard notes the following:

Royal Academy of Dramatic Art (RADA)
- Continuation data is 100% above the threshold where able to be reported (some levels have too low denominator for there to be a threshold to meet).
- Completion data is 100% above the threshold for all relevant levels applicable.
- Progression data for Other UG is mainly above the threshold (96.7%), but for First degrees there is a split of 59.7% above the threshold but 40.3% are below the threshold and this is due to the specialist nature of the programmes.

Inns of Court College of Advocacy (ICCA)

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

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[16] These are free standing modules that due to how they are reported means we are below thresholds

Graduate outcomes survey
The results for the Graduate Outcomes Survey (GOS) for the 2020/21 leavers are:

- 43.4% response rate (in comparison to 46% response rate in 2018/19 and 53.69% in 2019/20). 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.
- This reflects the broader trend downwards in national responses since the new format survey launched but is also a fall of 10.22% from year-on-year in King's responses.

Of the approx. 5,470 student who completed the survey:
- 88% of respondents are in a form of work or further study (including part-time) – a drop of 3% and the lowest since the new GOS was implemented in 2017.
- 60% are in full-time employment – up 2% but down by the national trend, with 10% in full-time study (down 1%).
- 79% are in some form of paid or unpaid unemployment (down 3% on national trend).
- Unemployment is down 1% (mirroring national trend and sitting on national average at 5%) alongside voluntary or unpaid work and those in full-time study (again on national trend), and a 2% fall in responses.
- The biggest shift is the 2% growth in responses classified as 'other' (which includes travel, caring, retirement etc) which may be expected at the height of the pandemic.
- King's total including this latter category is 94% (a fall of 1% on 2019/20).

Against the Russell Group, King's have dropped one place (from 6th to 7th) when reviewing the % of graduates in highly skilled work, despite an increase in our % by 0.32%. This same figure places King's as the last Russell Group institution to reflect a rise in our overall % rather than fall (between -0.11 and -1.30%), as was seen by seven institutions (Glasgow, UCL, QMUL, Imperial, Cambridge, Edinburgh and Oxford).

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 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 new (and previous) marking framework note how to take into consideration when marking students' English language proficiency.

During 2022/23 the invigilated online examinations pilot continued, with 29,999 students completing invigilating online assessments in an examination hall, alongside students taking traditional assessments in an examination hall (110,133 total assessments delivered).

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 2021/22, the following table demonstrates how King's compares against the Russell Group:

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

While we have experienced a small drop in awarding of good honours (1.7%), this is showing a downward trajectory of awarding of good honours following the covid mitigations in place, but not yet a return to pre-pandemic levels of awards (in 2018/19 86% of good honours was awarded). In terms of the OfS and their "unexplained" grade inflation, the recent report published[17] shows that our "unexplained" profile has slightly dropped to 9.5 percentage points (from 11.4 last year). Our awarding of 1st has also slightly dropped (42% awarded a 1st in 2021/22 vs 46% in 2020/21) but again this is higher than those awarded in 2018/19 (34%). *See External Examiners, page 31, for the reflections from the College Chief External Examiner regarding grade inflation.*

During this academic year Faculty Assessment Boards have received data pertinent to their faculty to review and discuss, and an overall discussion was held at the Academic Standards Sub-Committee at its meeting in May 2023, with the following noted:

- First class awards are 6 – 11% higher than in the 5 years prior to the pandemic.
- The College awarded 10% more first class honours and 11% more good honours than the sector average.
- BME students were awarded 11% fewer firsts and 6.5% fewer good honours than white students. The sector average for these awards was 12%.
- There had been a 7% increase in in the attainment gap for firsts and a 2% increase for good honours.
- There were discussions held around the limitations of the data e.g., the data does not cover all students due to how the data is reported to HESA, and this therefore makes it difficult for discussions to be had fully on the award profile of a cohort of students. These limitations of the data were also discussed at the first annual meeting of the College Chief External Examiner and Faculty Chief External Examiners.

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[17] Analysis of degree classifications over time: Changes in graduate attainment from 2010-11 to 2021-22 - Office for Students

- While appreciating the OfS has a threshold they use for reviewing awarding of good honours, Faculties would appreciate having a KPI[18] for what King's expects to be the level of awarding good honours.

As part of the review undertaken early in 2022/23 relating to the Degree Outcome Statement, findings of some explanations of grade inflation in recent years was attributed to the mitigations in place for covid:

- In 2019/20, 2% of the students were upgraded to the next classification due to the safety net average.
- In 2020/21, 2% of students from across 16 programme cohorts benefitted from cohort mitigation measures.
- In 2020/21, 1% of students benefitted from the combination of the safety net and cohort mitigation.
- A move from timed exams taken in a traditional exam hall setting to online exams taken within a 24-hour window. Some faculties reported that this contributed to an increase in marks.
- A redesign of assessment formats, including the consolidation of assessments so as to manage overall volume and alternative assessment formats to ensure suitability for remote assessment.
- An enhanced process for mitigating circumstances and assessment deferrals, including the removal of the requirement for evidence. In 2020/21, 9070 undergraduate students submitted requests from 24,715 elements of assessment, and the acceptance rate of requests was 91%.
- In 2019/20, the application of the 'Safety Net' to students whose average from 15 March 2020 was lower than the average of their summative grades from earlier in the academic year, or from the previous academic year if appropriate.
- In 2020/21, cohort outcomes for each programmes were reviewed against the 3 academic years preceding the pandemic and where the 2020/21 average was found to be lower, grades were moderated upwards.
- Modifications to the 2% upgrade rule.

While we have a small number of students who have yet to complete their programme and therefore their final awards will be reviewed in light of covid mitigations, most students will no longer have these mitigations and thus we should be seeing more downward trajectory of awarding of good honours over the next few years.

Committee work relating to assessment
During 2022/23 the following assessment related work has been discussed at College Education Committee and Academic Board (where appropriate):

- Approved a substantially revised Degree Outcome Statement in October 2022, and then an updated statement in May 2023 (paper ref: CEC: 22/23: 17 and CEC: 22/23: 108).
- Considerations for a university-wide e-assessment platform (separate from TeamCo pilot), with further discussions to be had with the Executive Director Transformation – Education and Student Success.
- Discussed a proposal from the Assessment Working Group on 7 key assessment and feedback projects (CEC: 22/23: 49). It was noted while in discussion that a College Assessment Strategy needed to be developed in parallel with the 7 key projects outlined in the paper.
- A review of mitigating circumstances policy has commenced, with an update provided at the February and May 2023, with the May meeting putting forward some proposals on evidence requirements (CEC: 22/23: 98).

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[18] Key Performance Indicator

- Approved an Interruption to Study Framework, to help guide and support students and staff when a student needs to interrupt their programme of study for a period of time. While King's has always had regulations around this, there wasn't any guidance to help support students and staff understand what was required, this has now been rectified for 2023/24 (paper ref: CEC:22/23:59).
- Discussed a proposed approach to reviewing assessment and feedback practices with the aim to simplify our assessments. This work will commence in 2023/24 (CEC: 22/23: 70).
- Approved revisions to the Academic Regulations, including the Support for Study Policy and Procedure

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). The work discussed during 2022/23 included:
- Continuing the work with Assessment of Learning, with eight of the ten faculties mapping their current assessment priorities to the College's principles of Assessment of Learning, identifying key areas of focus, success and challenges.
- The principles of Assessment of Learning were incorporated into processes for evaluating programmes (Periodic Programme Reviews and Continuous Enhancement Review).
- Provided some input into the College's submission to the Student Mental Health Charter
- Reviewed the feedback regulations and suggested revisions for 2023/24.
- Commenced discussions on AI technology, including organising webinars/workshop at the Assessment Festival on this topic.
- Reviewed practice around oral assessments to help guide the College on new guidance for 2023/24.
- Introduction of Rubric Champions in faculties to help improve the feedback students currently receive.

PGT:
For 2021/22, the following table demonstrates PGT awards:

Indicator	Merit and Distinction Awards[19]
Percentage of awards 2021/22	91.8%
Percentage of awards 2020/21	91.1%
Percentage of 2017/18 – 2019/20	83.2%

While there is no benchmark comparison with the Russell group, the table above does show that there has been an increase of nearly 8% 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 from 2022/23 and return to the rules pre-pandemic, as there had clearly been evidence of

grade inflation seen with this introduction, thus we expect to see some reduction in awarding of merit and distinction for 2022/23 onwards, but were not expecting to see a decline for 2021/22 awards.

PGR

For 2019/20 ,2020/21 and 2021/23 the following table demonstrates PGR awards:

	2019/20	Presented as % of overall awards	2020/21	Presented as % of overall awards	2021/22	Presented as % of overall awards
Final Awards	612		568		627	
First Time Passes	137	22%	129	23%	167	27%
One Month Corrections	17	3%	13	2%	10	2%
Minor Corrections (3 months)	343	56%	337	59%	405	65%
Major Corrections (6 months)	87	14%	70	12%	81	13%
Re-examination (18 months)	22	4%	17	3%	12	2%
MPhil Recommended	5	1%	1	0%	6	1%
Academic Fails	0	0	1	0%	2	0%

While there is no benchmark comparison with the Russell group, we are happy to report that year on year 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 and Re-examinations.
However, in 21/22 year we have seen an increase on (six) MPhil only recommendations and (two) academic fails. Percentage of these outcomes is low, but the faculties and the Centre for Doctoral Studies takes these outcomes very seriously and is working with individual faculties to determine if these outcomes could have been prevented.

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 started					
CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/2	Grand total
Theatre Costume	2017/8	PD[20]						0
		PM						0
	2018/9	PD	3					3
		PM	1					1
	2020/1	PD		4	3			7

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[20] Key: PM = Pass with Merit; PD = Pass with Distinction; P =Pass

| | | | Year Of Study started | | | | | |
CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/2	Grand total
		PM			1			1
	2021-2	PD				1		1
		PM				1		1
	2022-3	PD					2	2
		PM					1	1
Theatre Costume Total			**4**	**4**	**4**	**2**	**3**	**17**
Theatre LAB	2017/8	P						0
	2018/9	P	16					16
	2019/0	P		16				16
	2020/1	P	1		16			17
	(blank)	(blank)		1				1
	2021/2	**P**	1			17		18
	2022/3	**P**			1		18	19
Theatre LAB Total			**18**	**17**	**17**	**17**	**18**	**87**
ACTING[21]	2017/8	P						0
	2018/9	P						0
	2019/0	P	25					25
	(blank)	(blank)		2				2
	2020/1		1	27				28
	2021/2		1		23			24
	2022/3			1	3	15		19
ACTING Total			**27**	**29**	**26**	**15**	**0**	**97**
FdA Technical Theatre and Stage Management	2017/8	P						0
		PD						0
		PM						0
	2018/9	P	5					5
		PD	10					10
		PM	17					17
	2019/0	P		4				4
		PD		13				13
		PM		16				16
	2020/1	P		1	3			4
		PD			1			1
		PM			23			23
	2021/2	P			2	4		6
		PD				3		3

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

CRSN	Award AYR	CLASS	2017/8	2018/9	2019/0	2020/1	2021/2	Grand total
					Year Of Study started			
		PM		1		9		10
	2022-3	P				2	8	10
		PD					5	5
		PM			1	1	14	16
Technical Theatre and Stage Management Total			**32**	**35**	**30**	**19**	**27**	**143**
BA Technical Theatre and Stage Management	2017/8	P	1					1
		PD	11					11
		PM	5					5
	2018/9	P		1				1
		PD		10				10
		PM		7				7
	2019/0	P						0
		PD		1	14			15
		PM			10			10
	2020/1	P				1		1
		PD				13		13
		PM				12		12
	2021/2	P				1	5	6
		PD					6	6
		PM					13	13
	2022-3	P						0
		PD						0
		PM					1	1
BA Technical Theatre and Stage Management Total			**17**	**19**	**24**	**27**	**25**	**112**
Grand total			**98**	**104**	**101**	**80**	**73**	**456**

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.

In explaining some of the differences found in recent years awards the following is noted:
- In 2018/19 RADA updated their marking scheme for the Foundation Degree in Technical Theatre and Stage Management, BA in Technical Theatre and Stage Management and the PgDip in Theatre Costume.

- 2018-2019 was also the first year the 2-point discretionary uplift was removed for the BA Technical Theatre Stage Management programme, this was returned for the Covid Years and returned to no uplift allowed from 2021-2022.

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

	March 2021 (awarded September 2021)	September 2021 (awarded March 2022)	March 2022 (awarded August 2022)	September 2022 (awarded March 2023)
Part Two Enrolment	**37**	**21**	**52**	**23**
Interrupted Studies	2	0	0	0
Complete - Distinction	2	5	8	3
Complete - Merit	29	13	35	8
Complete - Pass	4	1	8	11
Complete - Fail	0	2	0	0
NA - Resits Pending	0	0	1	1

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.

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 2021/22		RAG rating
Undergraduate		
Percentage of External Examiner reports received[iii]	92%[22]	
Percentage of External Examiners who had received an induction[iv]	100%	
Confirmation of assurance that academic standards are met[v]	89%[23]	
Percentage of external examiner reports which include a concern on academic standards[vi]	11%	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC[vii]	80%[24]	

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[22] This is similar to last year's return rate, but during 2021/22 a number of universities were involved in strike action, which has had an impact on external examiners returning their reports
[23] Those concerns raised are noted below via the general themes summarised in overall reports submitted to the College during 2022/23
[24] This is lower than previous years, however staff have been participating in strike action, which has had an impact.

Postgraduate		
Percentage of external examiner reports received[viii]	85%[25]	
Percentage of external examiners who had received an induction[ix]	95%[26]	
Confirmation of assurance that academic standards are met[x]	92%[27]	
Percentage of external examiner reports which include a concern on academic standards[xi]	8% [28]	
Percentage of confirmation that Faculty made appropriate response to critical comments, approved by Chair of ASSC [xii]	79%[29]	

While there have been some improvements from previous year reports (notably PGT External Examiners having less concerns on academic standards), other aspects are of a similar %, or a decline, then previous years. Some of this can be equated to the strike actions undertaken throughout 2022/23, but responding back to External Examiners needs to be improved.

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 2021/22 reports noted comments impacting academic standards, no one required a separate letter to the external examiner from the Chair of Academic Standards Sub-Committee (ASSC). As with all reports that have raised a concern on academic standards, the Chair of ASSC reviews the comment and provides a response within the report that is then returned to the external examiner with the remaining comments from the programme team.[30]

General themes across 2021/22 external examiner reports were:
- Continued concern of open-book, online assessments impacting academic standards (specific subject areas, not across all subjects).
- Prevalence of plagiarism/collusion in certain assessment types, e.g., online assessments.
- Marking practices: volume of marking and quality and consistency of feedback.
- Continued concern of some grade inflation being seen in some subject areas – should be monitored and kept under review.
- The range of assessment methods and marking schemes were appropriate and suitable for the postgraduate level.

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[25] This is similar to last year's return rate, but during 2021/22 a number of universities were involved in strike action, which has had an impact on external examiners returning their reports

[26] Though these External Examiners have noted not receiving an induction, there may have been some confusion as to whether the induction given was recognised as such. Clearer communication to our External Examiners on induction is therefore required.

[27] Those concerns raised are noted below via the general themes summarised in overall reports submitted to the College during 2022/23

[28] This is a vast improvement from last year where 20% of External Examiner had raised a concern

[29] This is lower than previous years, however staff have been participating in strike action, which has had an impact.

[30] As noted in overview reports submitted to Academic Board in December 2022 (AB-22-12-14-08.2) and June 2023 (AB-23-06-28-09.2)

- Marking schemes were described as challenging but fair and allowed excellent students to distinguish themselves.
- Need to enhance communication with External Examiners, particularly being timelier in correspondence.
- Provision of practical/clinical projects and placements are of a high standard.

In 2022/23 the College introduced new external examiners roles: a College Chief External Examiner role, who attended all Academic Standards Sub-Committee; and Faculty Chief External Examiners, who sat 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.

An annual meeting was held with the Chief External Examiners in May 2023, and all Faculty Chief External Examiners have been submitting annual reports to the Academic Regulations, Quality and Standards team, where an overview report will be going to the first meetings of the 2023/24 academic year of the Academic Standards Sub-Committee, College Education Committee and Academic Board. The annual report received from the College Chief External Examiner in June 2023 noted:

- Good support from the Academic Regulations, Quality and Standards team, and the Chair of the Academic Standards Sub-Committee throughout the year.
- While there were initial issues with Faculty Assessment Boards (FABs) communicating dates of meeting with their Faculty Chief External Examiner this was resolved, however improved communications are required e.g., advising of dates set in advance (beginning of year).
- Faculty Chief External Examiners commented on the commitment and dedication of staff attending the assessment board meeting. They also noted how well run and efficient the meetings had been.
- All Faculty Chief External Examiners reported that the standards in each Faculty were consistent with the sector and the QAA benchmark disciple statements or Professional, Statutory and Regulatory Body (PSRB), where these applied.
- Faculty Chief External Examiners reported at the annual meeting that Faculties had good marking practices and worked hard to maintain standards.
- However, as has been reported in annual External Examiner overview reports, more can be done by programmes to make moderation outcomes more transparent and evidenced to external scrutiny.
- It is clear from the work of the Academic Standards Sub-Committee that processes to ensure consistency, rigour and fairness are constantly reviewed and developed. There is clear guidance around marking and the training needed to support GTA markers, mitigating circumstances are clearly monitored at College and Faculty level, there are developments taking place around assessment rubrics that are specific to the assignments set for each module, and processes around the administration of formal examinations are monitored and reviewed. There is a lot of commitment from staff at King's to constantly reflect and improve on processes.
- Regarding grade inflation, external examiners have given a view that the standards are comparable with other institutions, yet King's has a 10% higher than the sector number of good degrees, so is this about programme design, quality of teaching, support for students, characteristics of student intake, or an artifact of the OfS measuring process that derives a mean value across the sector? Taking this into account, do moves to reduce the number of good degrees to pre-pandemic levels make sense?
- It would seem that Kings is proactive in the way that it trains and develops external examiners in order to ensure that standards are consistent with the sector and externally validated.
- There has been significant ongoing industrial action. The Principal invoked the use of emergency regulations to ensure that a College-wide emergency was declared to allow progression and/or awards to continue when performance was disrupted, thus allowing the chair of Academic Standards Sub-Committee (ASSC) to:
  - Use alternative marking models or relax the rules within existing marking models (9.10)
  - Allow assessment to continue in the event that external examiners cannot fulfil their roles (9.11)

- Allow Assessment Boards to modify the method of assessment and/or relative weighting of assessments from those defined in the module specification (9.12)
- Allow students to progress and take assessments at a later date if they are unable to complete assessments due to the Industrial Action so long as this is permitted by Professional Statutory Regulatory Bodies (reg 9.13)
- Award rules remain in place and boundaries to grades cannot be changed or exceptions allowed (9.17)
- Research degree submission timelines could be extended (9.16) but the method of assessment remains via a viva (9.17)
- Additional provisions within the regulations allow for scenarios where ASSC or FABs are not quorate, or information is incomplete (9.14 and 9.15).

Marking and Assessment Boycott

As noted above the Principal invoked the use of the emergency regulations in November 2022 when industrial action was first commenced in 2022/23, with all taught External Examiners being informed of this in writing at the time the regulations were invoked. The regulations remained in place throughout the year due to the ongoing industrial action.

During the summer assessment period, a marking and assessment boycott was undertaken, and some programmes (not all) needed to make use of the emergency regulations. In using the regulations assurance was sought that the student's overall programme (and module where required) learning outcomes had been met, and that the final award continued to meet the OfS conditions of registration B4 (value of awards over time). Where the emergency regulations had been used, checks were undertaken to ensure the marks awarded to students were not differing to those from previous years, and where there were some slight differences additional checks of the student work was undertaken.

During 2023/24 a review of the academic regulations, including the emergency regulations, will be undertaken in light of the recent marking and assessment boycott, to clarify existing regulations but also to cover scenarios that the regulations may not cover e.g., where an Assessment Sub-Board and a Faculty Assessment Board are held but are not able to ratify results.

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[31]. Additionally, external examiners (programmes and Chiefs) confirm in their annual reports that the programme under review adheres to these sector-recognised standard*.*

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 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.

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[31] https://www.kcl.ac.uk/governancezone/governancelegal/quality-assurance-handbook

Periodic programme reviews provide us with continued assurance that our programmes meet sector-recognised standards. External Peers (and External Specialists on some reviews), sit on our programme review panels to give us this assurance. Programme review reports are submitted to Faculty Education Committee and College Education Committee for review, and though some review reports from 2022/23 have experienced a delay in being submitted to the College Education Committee[32] it is anticipated that by December 2023 all of 2022/23 reviews will have been submitted to the College for final re-validation of programmes.

Condition B6: Participation in the Teaching Excellence Framework (TEF)
In September 2022 the OfS launched the 2023 revised Teaching Excellence Framework (TEF)[33]. The TEF data dashboard was published September 2023, with the guidance document (including the student guidance document) released October 2023.

The TEF Steering Committee was re-established, and a project team worked on producing the Provider Submission document and KCLSU Sabbatical Officers worked on the Student Submission document, submitting both documents to the OfS by the deadline set in January 2023. The project team met regularly with KCLSU to keep them updated of any guidance received from the OfS, but also to provide any support the sabbatical officers required.

To aid with the production of the Provider Submission document meetings with stakeholders were held, evidence collated, and draft submission documents were considered by relevant stakeholders (including College Education Committee) before the Principal approved the final version to be submitted. Updates on progress of the submission was reported to College Education Committee and Academic Board during the September'22 – January'23 period.

King's was advised of its provisional results on 8th August 2023[34], as follows:
- Overall award: Silver
- Student experience award: Silver
- Student outcomes award: Gold

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

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

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

These awards will remain for the next 4 years, which is when the next TEF exercise is due.

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[32] Due to factors such as industrial action impacting staff responding to review reports, or where reviews were merged with PSRB accreditation visits and these PSRB reports are still outstanding
[33] Previously called the Teaching Excellence and Student Outcomes Framework
[34] The results are embargoed until 28th September 2023

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 2023 (AB-23-06-28-07.2), but a further review has been undertaken following the revised consumer law guidance issued by the UK's Competition and Markets Authority and the Chair of Academic Board approved these revisions in October 2023.[35].

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. A Fees and Studentship Committee is being established with the aim to provide greater consistency and clarify on fees too.

Complaints: Complaints at King's are managed through the Student Conduct and Appeals Office. Any CMA-related complaints are brought to the attention of the Student Consumer and Protection Board by the Associate Director (Student Conduct and Appeals). All timeframes, practices and principles recommended by the OIA are embedded within King's procedures and detailed in the academic regulations.

Any issues falling within the remit of the Advertising Standards Authority are routed through the Marketing team, but the Student Consumer and Protection Board have oversight of any formal complaints.

Student Consumer and Protection Board
The Student Consumer and Protection Board replaced the CMA Working Group in 2022/23. The Board has met twice and reported updates to the Programme Development and Approval Sub-Committee (PDASC-22-12-07-10 and PDASC-23-07-12-10.5).

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

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 2022/23	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]	36
Number of complaints escalated to the OIA	37
Number of complaints escalated to OIA that were not justified (benchmarked against the sector)	38

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 2794 cases compared to 1676 in the previous year. It is believed that the increase this year is likely due to increased mental health issues following the pandemic. It is recommended that this is reviewed along with the numbers of mitigating circumstances applications to understand more fully the reason for the continued increase in these numbers in significant numbers over the last five years.

A review of the Stage 1 Academic Appeals process was carried out in 2022/23 and a number of short-term improvements were made to the process including the use of a Teams Channel to share appeal submissions, an Outcomes Tracker tool for the whole process and a process flow within Teams. In the longer term, 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 further some of the pressure as it is not expected that the SCAMP (Student Case and Appointment Management Project) will provide an appropriate solution.

Complaints
The delays in turnaround times for complaints are likely to be due to the large numbers of industrial action complaints we have received (4017 compared with 2214 in 2021/22) 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 and turnaround time for them has improved (54 days compared to 86 days in 2021/22). For Stage 3 Complaints the delays are again due to the complexity of the cases which has resulted in lengthier investigations.

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[36] Academic Appeals. Regulatory timeframe for Stage 1: 42 days, average case turnaround time for Stage 1 (2794 cases): 54 days. Regulatory turnaround time for Stage 2: 42 days, average case turnaround time for Stage 2 (22 cases): 39 days. Complaints. Regulatory timeframe for Stage 2: 35 days, average case turnaround time for Stage 2 (4201 cases - including 4017 industrial action related complaints and 184 other complaints): 53 days. Regulatory timeframe for Stage 3: X 28 days, average case turnaround time for Stage 3 (35 cases): 41 days

[37] 24 cases were reported to the OIA in 2022/23. This is below the median for the number of complaints expected for universities within the same band as King's which is 37.

[38] The benchmark for the sector is X and Kings is 11 Not Justified, with 1 withdrawn, 1 ineligible and 10 to be concluded.

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 (24 compared to 30) and it is now below the median for universities of a similar size (which is 37).

The number of complaints that were not justified was a larger number than the median for the sector and there were no cases in which the OIA found complaints were justified which is a testament to Student Conduct & Appeals work to ensure the good practice framework principles are followed in cases as well as according to College regulations.

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

The Student Consumer and Protection Board identified at its May 2023 meeting that the Student Protection Plan required a review, and because the Plan had not been reviewed in three years raised the risk register around our compliance with this. The Head of Course Information is taking forward the review and is expected to report updates at the October 2023 meeting. Once revised the Student Protection Plan will need to be resubmitted to the OfS for their approval, as part of their Conditions of Registration.

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 2022/23 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, though the OfS confirmed that we did not require reporting any teaching partnerships, due to UKVI requirements we reported to the OfS in April 2023 the following teaching partnership[39]:

- University of Portsmouth

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[39] This was not reporting the University of Portsmouth as a proposed Branch Campus, which is currently being discussed with the MB BS programme

Annex 5: Condition F update: Information for students

Condition F1: Transparency information

We were advised by the OfS of the 2023 Transparency Return on the 12th October. On the 13th October the 2023 Transparency Return was uploaded onto our webpages and reported to the OfS. The information 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 received from OfS:

King's College London (UKPRN: 10003645)

Log of all activities for the Annual Financial Return 2022 (AFR22)

Date and time of activity	Outcome
Thursday 8 December 2022 14:25	The sign off form has successfully been submitted. The processed file 'AFR22_SignOff_10003645_1_08DEC2022_1425.xlsx' is now available in the latest successfully submitted files download package.
Tuesday 6 December 2022 14:40	Please arrange for the form to be signed by the Accountable Officer. Then upload the file to the portal.
Tuesday 6 December 2022 14:40	The OfS currently has no further queries regarding your return.
Thursday 1 December 2022 09:38	The return verification query responses have successfully been submitted. The OfS will review these as soon as possible. The submitted responses 'RESPONSES_AFR22_Queries_10003645_01DEC2022_0938.xlsx' are now available in the return verification queries download package.
Tuesday 29 November 2022 16:18	Please review any outstanding queries and complete your responses. Then upload the file to the portal.
Tuesday 29 November 2022 16:18	The financial statements have successfully been submitted. The processed file 'AFR22_FinancialStatements_10003645_1_29NOV2022_1618.pdf' is now available in the latest successfully submitted files download package.
Tuesday 29 November 2022 16:09	Please review any outstanding queries and complete your responses. Then upload the file to the portal.

Tuesday 29 November 2022 16:09	The external auditor's management letter has successfully been submitted. The processed file 'AFR22_ExternalAuditorsLetter_10003645_1_29NOV2022_1609.pdf' is now available in the latest successfully submitted files download package.
Tuesday 29 November 2022 14:44	Please review any outstanding queries and complete your responses. Then upload the file to the portal.
Tuesday 29 November 2022 14:44	The commentary has successfully been submitted. The processed file 'AFR22_Commentary_10003645_1_29NOV2022_1444.docx' is now available in the latest successfully submitted files download package.
Tuesday 29 November 2022 11:38	Please review any outstanding queries and complete your responses. Then upload the file to the portal.
Tuesday 29 November 2022 11:38	The workbook has successfully been submitted. The processed file 'AFR22_Workbook_10003645_1_29NOV2022_1138.xlsx' is now available in the latest successfully submitted files download package.
Tuesday 16 August 2022 15:07	Please review any outstanding queries and complete your responses. Then upload the file to the portal.
Friday 29 July 2022 12:08	Please review any outstanding queries and complete your responses. Then upload the file to the portal.
Friday 15 July 2022 07:56	Please review any outstanding queries and complete your responses. Then upload the file to the portal.

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) was paid when requested: OfS was paid 21st July 2023 (the deadline was 1st August 2023); HESA was paid 13th February 2023 (for 13th March 2023 deadline) and 18h August 2023 (for 13th September 2023 deadline).

Following QAA stepping down from the Designated Quality Body (DQB) role, and the OfS taking this on in the interim, their annual fee included this DQB fee too.

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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

Report for UUK on implementation of the Action Plan against the Concordat to Support the Career Development of Researchers (HR Excellence in Research Award Action Plan)

The accompanying paper describes a report on progress made towards the 2022-25 Action Plan against the Concordat to Support the Career Development of Researchers. This is required as a condition of King's having signed this Concordat and by funders when they are considering future awards of grants. An internal report on this action plan is to be approved annually by College Council and submitted to UUK for scrutiny via publication on an externally facing webpage on the King's website. Every third year this action plan is also submitted for renewal of the HR Excellence in Research Award for external accreditation of our compliance.

The accompanying report covers the period June 2022 to May 2023 following submission of the action plan in July 2022.

Academic Board and College Council are invited to:

1. Academic Board: Review the report and approve its passage to College Council (November 21st).
   College Council: to make the final approval.
2. Note the progress made on many of the project activities.
3. Note that contributions are being made from across the university, reflecting the increasing engagement with this initiative, and that many of them also address initiatives in King's Strategies and contribute to improving our research culture.

The action plans that King's has had against the Researcher Concordat have contributed greatly to enhancing the experience of our research staff (postdocs, research assistants, technical staff and teaching fellows). As we continue to maintain our HR Excellence in Research Award and now the annual internally approved report we are moving away from business as usual and working on higher level projects that we anticipate will have significant impact.

Within this plan we highlight three major activities
1. Addressing the use of Fixed-Term Contracts.
2. Addressing bullying and harassment
3. Increasing the support for managers of research staff

Interpretive notes
Readers of the report may also wish to refer to the Action Plan.

The action plan is divided into 3 major topics that follow the principles of the Researcher Development Concordat. These are Environment & Culture (EC), Employment (E) and Professional & Career Development (PCD). Each of these topics is subdivided into four sections, Institutions (I), Funders (F), Managers of Researchers (M) and Researchers (R). This results in the nomenclature ECI, ECF, ECM, ECR etc. in column A and resulting in anything labelled ECI, EI, PCDI being about what institutions are obliged to do, anything labelled ECM, EM, PCDM about what managers are obliged to do and ECR, ER, PCDR about what research staff are obliged to do. The reporting required is targeted for each of these groups.

Questions on the report should be directed to Kathy Barrett, Associate Director (Research Staff Development)

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

Universities and Research Institutes

Name of Institution	King's College London
Reporting period	June 2022-May 2023
Date approved by governing body	[date] to be completed following College Council approval
Date published online	[date] to be completed following College Council approval
Web address of annual report	https://www.kcl.ac.uk/research/support/professional-development/centre-for-research-staff-development#section-3
Web address of institutional Researcher Development Concordat webpage	https://www.kcl.ac.uk/research/support/professional-development/centre-for-research-staff-development#section-3
Contact for questions/concerns on researcher career development	Kathy Barrett, Associate Director (Research Staff Development) kathy.barrett@kcl.ac.uk
Date statement sent to Researcher Development Concordat secretariat via CDRsecretariat@universitiesuk.ac.uk	[insert date sent to secretariat]

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

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

In 2022 we established a post of Dean for Research Culture, appointing Professor Tim Newton to the role, followed by a new Research Culture Department funded by Research England, to be opened on October 2nd 2023. Successful application by the Principal and supported by the Dean of Research Culture and a team of academics and Professional Services Staff for funding from Wellcome, input from our experienced Equality, Diversity and Inclusion team and projects focussing on removing barriers to Black and Minority Ethnic PGR students continuing in an academic career trajectory will enable us to create a more inclusive career structure over the coming years that we anticipate will result in a more diverse research workforce. Faculties are also creating new posts with a remit of focusing on research culture.

King's has recently opened an Employee Relations Department that seeks to improve processes around retention, redeployment and redundancy. We have also invested in "Report + Support", a mechanism for managing all aspects of bullying, harassment and victimisation. We have restructured our Organisational Development and Equality, Diversity and Inclusion (EDI) departments to enhance the provision for EDI and wellbeing and leadership and reinvigorated "<u>Our Principles in Action</u>", a set of behavioural competencies that support positive interactions between our staff and students.

In 2016 we established the Centre for Research Staff Development (CRSD) to provide professional development and to engage in policy and best practice for research staff. This centre is now well established and is seen as an important hub for research staff issues and information.

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

Francisco Declaration on Research Assessment. We hold Athena SWAN Silver Awards at Institutional and Faculty level and a Bronze Race Equality Charter Mark. We routinely carry out surveys of research staff in alternate years and this year completed an all-staff survey that is currently undergoing evaluation. These surveys are enabling us to focus on issues that are of importance and relevance to those involved in research, including those that have an impact on research culture, for example the prevalence of bullying and harassment.

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

496 of 500 words

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

Strategic Objectives and monitoring

King's College London is now in its 11th year of receipt of the HR Excellence in Research Award, demonstrating our commitment to upholding the principles described in the Concordat to Support the Career Development of Researchers. We have described a variety of actions, with more detail available in the action plan for this award. Critically, much of the work that we do is now considered business-as-usual as our implementation of a large number of the principles is longstanding. We are now focussing on projects that will bring new and substantial change.

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

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

Environment and culture

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

3

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

Faculty-led and central training programmes addressing environment and culture included in the action plan cover Mental Health First Aid Training and specifically "Diversity THRIVE" for those from racialised or other minority backgrounds being piloted in one faculty with a view to rolling it out across the university.

Employment

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

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

The process for promotion of research staff is currently opaque. Efforts are being made by one faculty to ensure a consistent approach with a view to rolling out the findings to other faculties when complete.

Professional Development of Researchers

Professional development opportunities for managers around their obligations to researchers is generally increasing across the university. Specifically included in this action plan is a new course developed by the CRSD in collaboration with managers that also touches on the use of the Managers Toolkit, with 60 attendances in the first year.

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

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

4

598 of 600 words

Summary of actions taken, and evaluation of progress made, in the current reporting period to implement your plan to support the three pillars in respect of each of your key stakeholder groups [Institution; Academic Managers of Researchers (Deans, Heads of Schools/Departments/PIs); Researchers]	
Environment and Culture *(max 600 words)*	**Institution** **Positive Workplace Initiatives** Active Bystander training expanded to include a second more advanced programme following uptake of Part I by more than 1,000 employees. Report and Support launched in October 2022. Staff are using the system (34 named reports to June 2023) and data is becoming available to demonstrate that cases are being taken seriously. Future actions will include monitoring the progress of cases. Employee Relations Team established in May 2022 to support range of issues including, disciplinary, grievances, and non-renewal of FTCs. Encouraging use of informal resolution rather than escalation, in particular with B&H, as a new process at King's. Impact to be addressed over the next year. Establishment of a central "Strategic Programme Manager – Preventing and Addressing B&H" post to take forward actions and interventions to support staff and students. Impact to be addressed over the next year.

5

One faculty has been carrying out qualitative research with their staff on their perception of research culture in their faculty and are currently developing an action plan based on the results.

One faculty is also working towards raising awareness of what B&H is and how King's deals with it. The role of their Research Integrity Advisors is being made more visible and all the Advisors are fully aware of resources such as "Report + Support". Future consultation with departments and relevant committees will demonstrate how valuable this approach has been.

Academic Managers of Researchers

One faculty has initiated a "Catalyst Project" aimed at improving the research environment. This includes an event to highlight career opportunities, taking place in the summer of 2023, and work on improving induction processes, to take place later in 2023.

Within one faculty the assigned Task & Finish Group recommended the establishment of Confidential Advisor posts, to be rolled out in May 2023. Impact to be addressed over the next year. This is following on from the success of similar posts in a separate faculty.

One faculty is working on an EDI action plan with a specific strategic group to address workload, flexible working and long working hours. This work has been delayed beyond the planned deadline, but is still ongoing.

One faculty has set up an EDI hub that includes details of all training and awareness courses available online. They have made their staff aware and will be addressing the impact in the next year.

One faculty will be hosting a mindfulness, wellbeing and time management event with inclusivity at its heart. This will include speed talks by colleagues at all levels and backgrounds to encourage inclusivity. The event will be evaluated in the next reporting period.

Researchers

	Two faculties are creating dedicated Sharepoint hubs to be a central portal for all relevant information their Research Staff need. This is a work in progress, having been given a good foundation with a sister hub for PGR students. Impact to be measured in the next reporting period. One other faculty has chosen to organise events to raise awareness of available resources, the first one having been successful according to feedback gathered that has informed the planning for the next year. Mental Health First Aid Training has been rolled out to more than 50 staff, supported by various faculties and central services, and received positive feedback. Impact to be addressed over the next year. Diversity THRIVE, a training programme for researchers from racialised or other minority backgrounds, is under development in one faculty. Initial consultation event was positively received and provided material for the programme content. The programme will be rolled out in the pilot faculty over the next year, followed by evaluation. *598 of 600 words*
Employment *(max 600 words)*	**Institution** We have carried out an extensive review of the use of FTCs at our own and other universities. Typically, open contracts offered to those whose salary depends on external funds come with a caveat that the person is at risk of redundancy when the funding expires. When open contracts have been offered under these circumstances, research staff have viewed them as disingenuous. Consequently we have now moved to a new approach of ensuring that our processes around the use of FTCs are transparent, equitable and applied fairly. The new Employee Relations Team are also addressing the use of FTCs by raising awareness among managers of the appropriate process for contract termination. A new tool created for redeployment will be rolled out in autumn 2023. Inductions are variable across the university and many staff tell us that they are not aware of what is available to them. The CRSD and RSRC have been working together to generate new resources available from later in 2023. One faculty has been piloting a researcher-supervisor agreement signed during induction. Awareness of this document was low.

Future plans include awareness raising at a research staff away day.

Other faculties have been updating or enhancing their induction programme to include in one case, ethics and mentoring, and will be implementing evaluation next year.

The use of mentoring and buddying is gaining ground at King's. Faculties are setting up mentoring schemes for new employees to help them settle in. One has completed a mapping process to identify current mentoring provision and will put their programme in place in the next year. A second has included setting it up as an item on induction lists, with evaluation for next year.

One faculty has created an App for use in monitoring uptake of PDRs. This is now being used for all staff in the faculty and has provided accurate data, e.g. % take up, enabling the faculty to target areas where improvements are required.

Academic Managers of Researchers
While there are pockets of use of the Managers Toolkit, take up is slow. We will evaluate how those who already use it have found it and create more resources to interpret its use.

Researchers
Promotion processes for academic and research staff vary. One faculty raised the issue of including research staff in the academic performance framework. Local processes are now merged to create a consistent faculty policy. Evaluation will take place later in 2023.

In early 2023 we initiated the Mentoring and Support Awards for those who have provided substantial input to the research of PGR students. The awards will run annually, with the first round completed in June 2023, after the reporting period for this review.

Research staff continue to have mixed levels of awareness of their right to 10 days per year to devote to professional development. However, since the last survey 2 years ago there has been an increase from 6 to 8 out of 10 considering that they spend at least 1 day a month on professional development. For one faculty, appointing a Learning &

	Development Champion was expected to address this issue. There has been a delay in the appointment so the faculty have focused on improving their use of the online registration system. One faculty has set up funding for professional development beyond the internal programme. In the last year, 30% of all awards were made to research staff and a new category of awards created in which one has been ringfenced specifically for research staff. *582 of 600 words*
Professional development *(max 600 words)*	**Institution** Institutional funding for professional registration with the Science Council (RSci, RSciTech, CSci) has proved to be elusive during this reporting period. This has resulted in a reduction in technical colleagues applying for this important accreditation. New potential sources have been identified and these will be pursued over the next reporting period. One faculty has posted clear statements regarding their support of a range of careers on their webpages. In hindsight, it is difficult to evaluate this measure, other than to note that the statements have been posted. It potentially contributes to a greater confidence in research staff considering a broader careers choice so we will look at this in our next biennial careers survey, due in October 2023. **Academic Managers of Researchers** The CRSD's Challenge & Support Course, designed in collaboration with managers to support them specifically in managing research staff, ran 3 times in 2022-3. Booking numbers increased with each iteration resulting in more than 60 attendances. Course participants reported a learning gain immediately after the course and 3 months after the course 100% of respondents reported a direct change to their working practice due to attending the course. We plan to continue running this course in the forthcoming academic year. Since the original action plan was written, UKRI and other funders have requested that grant applicants include how they will support their staff during their projects. The CRSD

plan to extend the above training to cover this topic, starting with a pilot in one faculty.

We are also in the process of developing a hub for research staff managers supporting them in having career conversations with research staff and how to refer them to other services such as King's Careers & Employability. Initial scoping exercises were to be completed by July 2023 with implementation in two stages, one each in the following two years. Those managing this project have now left King's so we will be seeking replacements.

Researchers

One faculty has set up an award scheme to recognise contributions of research staff to a wider agenda, e.g. committee contributions and project leadership. This award scheme is now up and running with the first awards to be made in the next reporting period. The intention is that research staff will be encouraged to broaden their skills and experience by this award. Evaluation will be carried out in the next reporting period.

We have compiled a suite of 20 case studies of King's Postdocs who have moved on to careers outside of the academic environment to encourage our current researchers to view other career options positively. These case studies and an accompanying report describing what we know about postdoc career trajectories outside of academia was launched in autumn 2022 under the name "Career Tracks" and within the reporting period has been widely viewed.

King's Careers & Employability have developed a suite of new courses around academic progression that are targeted to specific groups, e.g. Advancing in Academia for Natural & Mathematical Sciences, to be delivered during the next reporting period, What's up Doc for research assistants considering a PhD, run in March 2023 with 18 attendees providing positive feedback, and a generic online version of Advancing in Academia, to be launched in summer 2023.

We have also collaborated with the Science Museum in offering volunteer roles for our technical staff to enable them to learn about presenting to the public and boosting the profile of the technical profession. This proved popular

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| | with some of our technicians, who were given excellent feedback by the museum. |
| | *586 of 600 words* |

Comment on any lessons learned from the activities undertaken over this period and any modifications you propose to make to your action plan and measures of success as a result. *(max 500 words)*
As the Research Culture agenda takes root we are seeing more enthusiasm from senior management and the faculties to engage with the principles of the Researcher Development Concordat. This is enabling us to drive through relevant initiatives as they are included in an increasing number of strategic plans.

Most of our projects were new last year and many on a larger scale than previous projects. Full evaluation will necessarily be longer term. We are also running our biennial survey after the reporting period and while the data is not yet available, we will be able to use this in future evaluations. We are confident that the majority of projects contained in our 2022-2025 action plan are making good progress and we anticipate seeing more impact in the next reporting period.

We are very happy with the new approach we have taken, to cease reporting on what has become business-as-usual and focus on projects that we anticipate will be difficult but that will result in substantial benefits for research staff. We have already noticed this with our courses for the managers of research staff. We anticipate that our project to address the use of FTCs will similarly yield positive results.

Reviewing the use of FTCs resulted in surprising findings, in that while we originally felt that moving to open contracts was the appropriate action we are now of the opinion that this is disingenuous as it will make no difference to our research staff. Consequently we have changed the project to ensuring that the existing processes are transparent and fair and that we are able to redeploy staff facing redundancy wherever possible. This will be carried out over the next two years, the aims being:
1. Clear uptake of open contracts following 4 years of service or valid business reasons not to do so.
2. Contract length to be the maximum possible, measured by an increase in average contract length or valid business reasons for no change.

The implementation of "Report + Support" in its early days appears to be having an impact on the perception of how King's responds to B&H. This is aided by the establishment of a dedicated and experienced team to address these issues. While we anticipate that reporting may increase we would like to think that this is because our colleagues are more willing to come forward. We will be watching the outcomes from this initiative with enthusiasm, including data on the number of cases dealt with, the time it takes to deal with them and the kinds of resolutions reached. |

Supporting managers in their ability to serve their research staff is an area that we can see needs more attention. We will move towards broadening our offering for this group of colleagues over the next two years, tapping into the requirement for professional development to be written into grant applications. The CRSD will measure this by the numbers of staff we discuss these issues with and the success of grant applications containing this information.

499 of 500 words

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

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

Fixed-term contracts

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

Bullying and Harassment

1. Continue to monitor the use of "Report + Support", creating clear data to demonstrate the value of the information within it and the success of resolution of conflict prior to official registration of cases and outcomes of cases that are officially registered.
2. Continue "Active Bystander" training, monitoring uptake and feedback from participants to ensure it continues to be of value.

3. Evaluate the experience of B&H via All Staff survey and surveys of research staff and their managers, either across the university or locally, making comparisons to data from previous years.

Training and Resources for Managers
1. Continuation of existing courses and creation of new ones to support good practice in the management of research staff and creation of new courses and resources for those needing to include professional development of their staff into grant applications. Monitoring will be by long term feedback from course participants and research staff employed on such grants, together with success rates of grant applications.
2. Continuation of the construction of a careers hub for managers to support them in having productive career conversations with their staff and how to refer them to other resources.

New Project
Following on from the success of our Career Tracks project we will now focus on identification of the career paths taken by those who start as researchers and remain in Higher Education in roles other than becoming an academic. The outcome will be a resource for research staff and their managers to understand the options for those who wish to take alternative paths and the strategies used to do this.

500 of 500 words

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

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

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

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

Current timeframes are for College Council to receive the report for discussion at their November meeting, with the reporting period coinciding with that of the HR

Excellence in Research Award submission, typically ending in May. Publication of the action plan aligns with the HR Excellence in Research Award renewal, typically November.
200 of 200 words

Signature on behalf of governing body:

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

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

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

Council	
Meeting date	21 November 2023
Paper reference	KCC-23-11-21-09.6
Status	Final

Report of the Governance & Nominations Committee - Reserved

Contents	Meeting at which considered	Consent agenda	Council action
1. Appointment of Independent Co-opted Member of ARCC	Via email 8 November 2023	Yes	Approve

To Approve

1. **Appointment of Independent Co-opted Member of ARCC**

   Motion: **That Yolande Young be appointed as an Independent Co-opted Member of the Audit, Risk & Compliance Committee for a three-year term commencing 1 December 2023.**

   Background:
   See attached report from the Chair of ARCC.

Clare Sumner
Chair, GNC
November 2023

This page has been redacted