Item 15
For Approval

GLASGOW KELVIN COLLEGE

Board of Management Meeting of 10 October 2022

Corporate Services Framework

Report by Director of Corporate Services

1. Introduction

This report is intended to provide members of the Board of Management with a copy of the Corporate Services Framework which is contained within **Appendix 1**.

This five-year framework will be routinely reviewed to ensure it continues to deliver its aims in supporting the College Strategy 2022-27.

2. Corporate Services Framework

This framework outlines the Corporate Services function in place at the College and will form part of the College's Corporate Strategy (this is being produced at present and will be presented to the Board of Management in December 2022.) Other Frameworks which will fall under the Corporate Strategy are:

- Risk Management Framework (agreed in December 2021),
- Communications, Marketing and Stakeholder Engagement Framework (agreed in August 2022),
- Information Security Framework (currently being written)
- Business Development Framework (currently being written)

The Corporate Services Framework fosters a culture of openness, transparency and trust in line with good governance principles and sets out the priorities and objectives for Corporate Services functions, recognising the various audiences. Having an effective Corporate Services function underpins information governance and is vital to the smooth running of data flows.

3. Resource Implications

The resources to support an effective Corporate Services function are in place; no new resource implications are required.

4. Risk and Assurance

An effective Corporate Services function ensures that governance standards remain at a high level. The procedures and staffing in place minimises the risk of non-compliance.

5. Equality

No adverse impacts on individuals with protected characteristics have been identified as a consequence of this report.

6. Data Protection

There are no data protection implications arising as a consequence of this report.

7. Recommendations

Members are recommended to:

i) note the contents of this report and its appendix; and
ii) approve the Corporate Services Framework.

8. Further Information

Members can obtain further information on the contents of this report from Lisa Clark, Director of Corporate Services - lisaclark@glasgowkelvin.ac.uk

LC
September 2022

Appendix 1

Glasgow Kelvin College

Corporate Services Framework

Document Control Information	
Reviewed by the SMT:	September 2022
Date of Next Review:	October 2027 - TBC
Approved by Board of Management:	10 October 2022 - TBC

The Board of Management (or any person/group with delegated authority from the Board) reserves the right to amend this document at any time should the need arise following consultation with employee representatives.

Table of Contents

1. Introduction 3
2. Framework Objectives 3
3. Corporate Services Functions 3
4. Business Continuity 3
4.1. Policy and Programme Management 4
4.2. Embedding 4
4.3. Analysis 4
4.4. Design 4
4.5. Implementation 4
4.6. Validation 5
5. Corporate Governance 5
5.1. Board of Management and Standing Committees 5
5.2. Standing Orders and Terms of Reference 5
5.3. Policies, Strategies and Frameworks 6
5.4. Code of Good Governance 6
5.5. Externally Facilitated Effectiveness Review 6
6. The Standards Commission for Scotland 6
7. Office of the Scottish Charity Regulator (OSCR) 7
8. Compliance with the Freedom of Information (Scotland) Act 2002 (FOISA) and Environmental Information (Scotland) Act 2004 (EIR) 7
9. Commendations and Complaints 7
9.1. Commendations 7
9.2. Complaints 7
10. GDPR and Data Protection 8
10.1. Privacy Notices 8
10.2. Data Security 8
10.3. Data Retention 9
10.4. Data Protection Impact Assessment 9
10.5. Subject Access Requests 9
10.5.1 Right to erasure, to restrict processing, to rectification and to object 9
10.6. Data Protection Breaches 9
11. Estates 9
12. Environment and Sustainability 10
12.1. Race to Zero 10
12.2. Public Sector Climate Change Duties Report 10
13. Review 10

1. Introduction

In line with the College's Corporate Strategy, this framework outlines the Corporate Services function in place at the College.

This framework fosters a culture of openness, transparency and trust in line with good governance principles and sets out the priorities and objectives for Corporate Services, recognising the various audiences. Having an effective Corporate Services function underpins information governance and is vital to the smooth running of data flows.

This five-year framework will be routinely reviewed to ensure it continues to deliver its aims in supporting the College Strategy 2022-27.

2. Framework Objectives

The **principal objectives of this Framework are:**

- to provide an overview of the corporate services functions;
- to ensure that the corporate services functions promote and underpin the vision, values and identity of Glasgow Kelvin College;
- ensure a college-wide, consistent and positive approach to all corporate services functions which will protect and indeed enhance the reputation of the College; and
- to ensure that the required mechanisms and organisational controls are in place to support the Corporate Services function.

3. Corporate Services Functions

The Corporate Services function of the College comprises of the following areas:

- Business Continuity;
- Corporate Governance;
- Board of Management and Standing Committees;
- Standing Orders and Terms of Reference;
- Policies, Strategies and Frameworks;
- Code of Good Governance;
- Externally Facilitated Effectiveness Review;
- Standards Commission Guidelines;
- Office of the Scottish Charity Regulator (OSCR);
- Freedom of Information;
- Commendations and Complaints;
- GDPR and Data Protection;
- Estates; and
- Environmental and Sustainability

4. Business Continuity

The College supports business continuity and resilience by observing the Good Practice Guidelines as produced by the Business Continuity Institute (BCI). This is achieved by following the BCI's six Professional Practices.

4.1. Policy and Programme Management

The College supports this professional practice in the following ways:

- By having a comprehensive Business Continuity Plan (BCP);
- The Senior Management Team have oversight of the plan and are fully involved with the Incident Management Team during any incidents at the College;
- The Senior Management Team regularly take part in Tabletop Exercises used to test the Business Continuity Plan;
- By identifying the stakeholders who may be affected should there be an incident which affects the College; and
- by regularly reviewing the Plan in line with any changes of a statutory, legal or market nature.

4.2. Embedding

Embedding the Business Continuity Programme is achieved by:

- Engaging with all interested parties within the College;
- By having a member of the Incident Management Team holding the qualification Certification of the Business Continuity Institute (CBCI) which allows them to access resources from the Business Continuity Institute;
- Using existing communication channels within the College, such as SWAY, email, staff development events etc. to promote the BCP and good safe working practices; and
- Involving Faculties and Support Departments in their own recovery plans.

4.3. Analysis

The College undertakes analysis by:

Having robust Risk Management procedures in place, including individual departmental risk registers and an overarching College Risk Register; and
Horizon scanning to identify any emerging risks or hazards which may have an impact on the College.

4.4. Design

The College has identified and selected appropriate solutions to determine how continuity can be achieved should an incident occur by:

- Identifying solutions that allow us to achieve Recovery Time Objectives (RTOs); and
- Regularly review plans to ensure that the most appropriate solutions are in place and that these are in line with advice from sources such as the UK Government, Higher Education Business Continuity Network (HEBCON), National Centre for Cyber Security and Police Scotland.

4.5. Implementation

The College has identified the priorities, procedures, responsibilities and resources that will be required to support it during an incident by:

- Having a response structure in place for the activation, escalation and control of the College's response;
- Having an Incident Management Team composed of staff from key areas of the College

who have the authority and competency to implement the agreed solutions;
- Having the ability to communicate with internal and external interested parties; and
- Access to resources to support the agreed continuity solutions.

4.6. Validation

The College will confirm that the Business Continuity Plan is current, accurate, effective and compete by:

- Developing an exercise plan to train for, assess, practice and improve, where necessary, the business continuity capability of the College;
- By putting in place a maintenance process to ensure the business continuity arrangements and plans are kept relevant, up to date and ready to respond should an incident occur; and
- Having a review process to assess the effectiveness of the plans and identifying opportunities for improvement. This is achieved by having a Lessons Learned register, and supporting paperwork, which documents how the Incident Management Team and Business Continuity Plans performed during an incident or exercise.

5. Corporate Governance

The Board of Management is responsible for the governance of the College. The strategic direction of the College is set by the Board which is responsible for all College policy. It conforms to legal responsibilities as defined by the Further and Higher Education (Scotland) Act 1992 and is an Assigned College of the Glasgow Colleges' Regional Board.

5.1. Board of Management and Standing Committees

The Board of Management meet five times per academic session, observers are welcome. There are six Standing Committees who meet as noted below:

- Audit and Risk Committee – a minimum of four times per academic year;
- Finance and Resources Committee – a minimum of four times per academic year;
- Learning and Teaching Committee – a minimum of four times per academic year;
- Executive Committee – when required;
- Remuneration Committee – when required and at least once per academic year; and
- Nominations Committee – when required.

Agendas, associated papers and minutes are made available for the above meetings in accordance with the Board of Management's Standing Orders and Freedom of Information Publication Scheme; at least 5 working days prior to the meeting.

In adherence with the College's commitment to transparency, and as set out in the Colleges Model Publication Scheme, the agendas, associated papers and minutes are made available on the College website 5 working days after the meetings. This is with the exception of papers classed as *not for the public domain* as set out by the Freedom of Information (Scotland) Act 2002 (FOISA) (see point 8).

5.2. Standing Orders and Terms of Reference

The Board of Management adhere to the Standing Orders reviewed and approved by the Board on a two-yearly schedule. The purpose of the Standing Orders is to regulate meetings held by the Board and its Standing Committees and to ensure orderly and effective conduct in line with Schedule 2 to

the Further and Higher Education (Scotland) Act 1992.

The Terms of Reference for the Standing Committees outline the remit of the committee and also include membership, quorum and voting rights.
Any recommendations made by the Committees which have a material impact on the College must be referred to and approved by the Board of Management.

The Standing Orders and Terms of Reference can be viewed on the College website at: https://www.glasgowkelvin.ac.uk/

5.3. Policies, Strategies and Frameworks

The College has a comprehensive suite of policies, strategies and frameworks that apply to staff, students and its partners. These are reviewed in line with the College's review schedule to ensure compliance.

The list of college policies, strategies and frameworks can be viewed on the College website at: https://www.glasgowkelvin.ac.uk/

5.4. Code of Good Governance

The Code of Good Governance is a document produced by Colleges Scotland Good Governance Steering Group it codifies the principles of good governance that already exist in colleges and promotes accountability and continuous improvement in how colleges are governed. The College is committed to delivering the highest standards of governance therefore adherence to the Code is paramount.

Code-of-Good-Governance.pdf (cdn.ac.uk)

5.5. Externally Facilitated Effectiveness Review

All further education colleges are subjected to an Externally Facilitated Effectiveness Review every 3-5 years. This review checks compliance with the Code of Good Governance and individual meetings with Board members also takes place.

6. The Standards Commission for Scotland

The Standards Commission for Scotland is an independent public body who are responsible for encouraging high standards of behaviour by councillors and those appointed to boards of devolved public bodies.

The role of the Standards Commission is to:

- Encourage high ethical standards in public life; including the promotion and enforcement of the Codes of Conduct and to issue guidance to councils and devolved public bodies; and
- Adjudicate on alleged breaches of the Codes of Conduct, and where a breach is found, to apply a sanction.

The Board of Management of Glasgow Kelvin College adheres to the requirements of the Standards Commission via regular updates codes of practice and training sessions.

7. Office of the Scottish Charity Regulator (OSCR)

Glasgow Kelvin College, as a registered charity, ensures that annual returns are made and that Board members are aware of their obligations as a Trustee of a Charity under OSCR regulations.

8. Compliance with the Freedom of Information (Scotland) Act 2002 (FOISA) and Environmental Information (Scotland) Act 2004 (EIR)

The College has a culture of openness and transparency and, as such, is committed to the underlying principles of both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Act 2004.

Ensuring compliance with legislation, the College has adopted a Publication Scheme. Our Publication Scheme sets out the classes of information that the College publishes, how the information is made available, specifies fee details (if applicable), and the relevant point of contact for submitting a request. We endeavour to respond to all requests received within the twenty day timescale and publish responses (redacting any personal identifiable information) quarterly on our website here Glasgow Kelvin College - Freedom of Information. In addition to publishing responses on our website, the College also submits statistics relating to requests received under FOISA and EIR to the Scottish Information Commissioner on a quarterly basis.

Compliance with the legislation/timescales etc. is routinely monitored by the Senior Management Team and an annual report is prepared and presented to the College Board of Management, providing further reassurance.

9. Commendations and Complaints

9.1. Commendations

The College strives to provide a high-quality service and learning environment to all learners and other service users.

The Corporate Services Team administers the College Commendations process, which provides a mechanism for staff whose actions have impacted positively on learners/other service users to be recognised by the Principal/Senior Management Team.

9.2. Complaints

The College welcomes feedback from learners/service users as it allows us the opportunity to improve our services. This is in line with our continuous improvement culture.

The College Complaints Handling Procedure (CHP) mirrors the Scottish Public Sector Ombudsman's (SPSO), Model Complaints Handling Procedure. We endeavour to respond to complaints within the relevant timescales for both stage one (five working days) and stage two (twenty working days) complaints and facilitate escalation by complainants up to review stage (Principal level) as appropriate.

Complaints data is shared at various College committees to ensure any trends can be identified and both teaching and support staff teams can input into any improvements necessary.

The SPSO have set five mandatory key performance indicators (KPI's), which allows us to understand and report on performance and compliance with the Model Complaints Handling Procedure, these are:

- Learning from complaints;

- Total number of complaints received;
- The number and percentage of complaints at each stage which were closed in full within the set timescales;
- The average time in working days for a full response to complaints at each stage; and
- The outcome of complaints at each stage.

In addition to the mandatory KPI's, the SPSO have also set three recommended indicators for further reporting, these are:

- Raising awareness;
- Staff training in complaint handling; and
- Customer satisfaction with the complaints process.

This data is recorded throughout the academic year and is used to form the basis of quarterly and annual reports, published on our website Glasgow Kelvin College - Commendations and Complaints and informs our annual report to the Board of Management – Learning and Teaching Committee.

10. GDPR and Data Protection

Glasgow Kelvin College is committed to data protection by default and by design and supports the data protection rights of all those with whom it works, including, but not limited to, staff, students, visitors, and other key stakeholders.

The College holds and processes personal data about individuals such as employees, students, and others, defined as 'data subjects'. Such data must only be processed in accordance with the UK General Data Protection Regulations (GDPR) and the Data Protection Act (DPA).

The College, as data controller, has a corporate responsibility to implement and comply with data protection legislation. This corporate responsibility is delegated to the GDPR team. The College also has access to a shared Data Protection Officer (DPO) to monitor and advise on compliance with the GDPR and the DPA. The DPO's responsibilities also include conducting regular GDPR internal audits.

All College staff have a responsibility to ensure compliance with the GDPR, the DPA and the College Data Protection Policy, and to develop and encourage good information handling practices within their areas of responsibility. To assist with this, it is mandatory to complete the GDPR module of WorkRite online training.

10.1. Privacy Notices

When the College collects personal data from individuals, the requirement for 'fairness and transparency' must be adhered to. This means that the College must provide data subjects with a 'privacy notice' to let them know how and for what purpose their personal data are processed. Any data processing must be consistent or compatible with that purpose.

10.2. Data Security

Staff and students at the College must ensure that personal data is always held securely and not disclosed to any authorised third party either accidentally, negligently, or intentionally. The Information Security Policy must be read in conjunction with the Data Protection Policy.

10.3. Data Retention

Personal data must not be kept longer than necessary for the purposes for which it was originally collected. This applies to all personal data, whether held on core systems, local PCs, laptops, or mobile devices or held on paper. If the data is no longer required, it must be securely destroyed or deleted. Confidential records should be securely disposed of within the terms of the College's data retention schedule.

10.4. Data Protection Impact Assessment

A Data protection impact assessment (DPIA) is a mechanism for identifying and examining the impact of new initiatives and putting in place measures to minimise or reduce privacy risks during the design stages of a process and throughout the lifecycle of the initiative. A DPIA should be completed in consultation with the GDPR team.

10.5. Subject Access Requests

Individuals have the right to request to see or receive copies of any information the College holds about them The College must respond to these Subject Access Requests within one calendar month of the receipt of the request.

10.5.1 Right to erasure, to restrict processing, to rectification and to object

In certain circumstances data subjects have the right to have their data erased. In some circumstances, data subjects may not wish to have their data erased but rather have any further processing restricted. If personal data is inaccurate, data subjects have the right to require the College to rectify inaccuracies.

Data subjects also have the right to object to specific types of processing such as processing for direct marketing, research, or statistical purposes. All such requests are assessed by the GDPR team.

10.6. Data Protection Breaches

The College is responsible for ensuring appropriate and proportionate security for the personal data that it holds. This includes protecting the data against unauthorised or unlawful processing and against accidental loss, destruction, or damage of the data.
It is important that any personal data breaches, or indeed suspected breaches, across the College are reported as soon as possible to the Director of Corporate Services. See the College Data Breach Procedure. Under the terms of GDPR, data controllers have no longer than 72 hours to report a breach to the Information Commissioners Office after having become aware of it.

11. Estates

The Estates and Sustainability Strategy (agreed in 2022) is being progressed accordingly.

The Estates and Sustainability Strategy sets out our goal to open our vibrant College estate to the communities we serve to further anchor our position as a key asset for a wide variety of stakeholder groups. We strive to deliver a physical and social learning environment where we are recognised as "the place to be" by providing excellent learning, teaching, recreational and social spaces for our students to grow and develop the skills they will need in a changing world.

12. Environment and Sustainability

Through the Estates and Sustainability Strategy, we aim to provide a greener College environment for our learners and staff by addressing the challenges of the global climate emergency. The College aims to become a centre of excellence for “green” education.

12.1. Race to Zero

Glasgow Kelvin College has joined the Race to Zero, the global campaign against climate change, and has pledged to cut its greenhouse gas emissions to net zero by 2045. The Race to Zero is an UN-backed campaign to rally leadership and support from businesses, cities, regions and investors for a healthy, resilient, zero-carbon recovery that prevents future threats, creates decent jobs, and unlocks inclusive, sustainable growth. The College will produce a revised Climate Change Action Plan taking cognisance of the EAUC/NOUS Climate Action Roadmap for FE Colleges.

12.2. Public Sector Climate Change Duties Report

In 2015 the Scottish Government introduced new climate change reporting requirements for large institutions within the public sector under the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015. The arrangements involve the submission of an annual report (Public Sector Climate Change Duty Annual Report - PSCCDR) detailing energy and emissions performance data along with information regarding carbon management governance arrangements, detail of carbon reduction planning (including projects implemented during the relevant year and projects planned for the following year) and information regarding steps taken by the College to adapt to the effects of climate change. The reporting framework utilises a universal reporting template and provides an additional focus on climate change performance within the sector.

13. Review

The Corporate Services Framework will be reviewed every five years, unless changes require to be made during this period.