MidKent College

GOVERNING BODY

GROUP RISK & AUDIT COMMITTEE

Minutes of the meeting of the Group Risk & Audit Committee held on Thursday 5 March 2026 at 17.30hrs via Teams. A Closed Session took place at 17.00hrs.

Present:	Mr A Hindson	Chair
	Mr M Abdel-Maguid	
	Mrs J Dyakova	
	Mr M Prentis	
	Mrs L Snedden	
In attendance:	Ms C Burkin	Clerk to the Governing Body
	Mr S Cook	Principal/CEO
	Mr S Coudounaris	Guest - observing
	Mrs H Foreman	For item 5&6 only
	Mr L Glover	Validera – Internal Auditors
	Mr J Godsmark	Validera – Internal Auditors
	Mr C Hare	Deputy CEO for item 8 only
	Mr J Thirgood	Chief Finance Officer
	Mrs J Thompson	Director of People Team for item 8 only

A closed session had taken place prior to the main Committee were both internal and external auditors were in attendance.

1 Declarations of Interest

All members' interests are numbered and referenced on the Declaration of Interest log available from the Clerk.

2 Apologies for Absence

No apologies were received.

3 Minutes of the meeting held on 26 November 2025

The minutes of the meeting held on 26 November 2025, Paper GBGR&A25/721, were accepted as a true record and approved by the Committee.

4 Matters Arising and Outstanding Matters Report

Members discussed Paper GBGR&A25/722, the Outstanding Matters Report.

No 1. Alignment of the operational Risk Register for MKCTS & MKC – **Ongoing**.
No 2. Strategic Risk Management refresh – **Complete**.
No 3. GR&A Committee Annual Report – approved. **Complete**.
No 4. Internal Audit Reports summary sheet – improved. **Complete**.
No 5. Scope of additional audit of People Team – agreed. **Complete**.
No 6. Completion of feedback requests following internal audits – **ongoing**.

Members accepted the report and the recommended actions arising from it.

5 Information Security Report (GDPR) – Paper GBGR&A25/723

Hazel Foreman joined the meeting and presented the report which aimed to provide Governors with an oversight of compliance with legal requests and an update on the most recent developments in information security at the College

Members noted the comprehensive report which highlighted data protection activities, including recent legislative changes, data breach trends, staff training, and the application of proportionate responses to data subject access requests.

H Foreman outlined the impact of the Data Use and Access Bill, which complemented the Data Protection Act 2018, and described the need for College policies and procedures to be updated to reflect the legislation.

Action: H Foreman

H Foreman reported an increase in low-level data breach reporting, attributed to greater staff awareness. Members enquired about the resource of the team and H Foreman explained that the information governance team included shared resources across the Group with additional support from curriculum administration.

Members requested a review at the next meeting of the proportionate approach to data requests and breach management in an annual reflection report.

Action: H Foreman/S Cook

The Committee discussed the retention and deletion policies for Teams meeting recordings and clarified that recordings are subject to a 30-day retention period unless downloaded to secure storage and only accessible by the transcript owner.

Members thanked H Foreman for the update.

6 Policies for Review – paper GBGR&A25/724

Hazel Foreman explained that the following policies had been reviewed and only minor updates were required and therefore, presented for information.

- Information Charter (minor)
- Freedom of Information - FOI (minor)

Members noted the Data Protection Policy will be reviewed for the next meeting. They thanked H Foreman and *she left the meeting*.

7 Strategic Risk Management Report - Paper GBGR&A25/725

Simon Cook presented the strategic risk management report and highlighted the following points:

- 3 key changes to previous risk scores
- 3 proposals relating to scores that are higher than appetite
- An update on the external intervention triggers published by DfE and implemented through the FE Commissioner, and
- A revision to the rank ordering of risks

The Committee noted the changes to risk scores, particularly those related to workforce and succession planning. S Cook clarified that some previously identified high-risk items were due to outdated figures, with the register now reflecting more accurate risk appetites and categories. It was recognised through the discussion that the risk appetite limits for specific risks within a category would not be independently changed. Risk appetites have been set at the risk category level and it had been agreed to keep the current risk appetites for a 12-month period prior to review.

Action: Committee – March 2027

He highlighted the updated DfE external intervention triggers and members noted the increased risk around circumstances under which intervention could occur. Members were assured that the Executive team are analysing the implications for the College.

Members challenged the financial sustainability of the College's high proportion of students with special educational needs and were assured that the College maintained a balanced student mix to mitigate any risk. The Committee also discussed sector benchmarks for students who declared needs and were assured by the College’s position. Members asked for further assurance regarding a quantifiable threshold or tipping point for the proportion of SEND students, to monitor as a risk metric.

Action: S Cook/J Thirgood

Members thanked S Cook for the report.

8 Deep Dive – Staff retention and wellbeing - Paper GBGR&A25/726

Julia Thomson joined the meeting to present the report which informed the Committee of the current People risks and mitigating actions. The reported included workforce resilience, recruitment challenges, retention strategies, absence management, leadership development, and well-being initiatives.

She highlighted the following key points for discussion:

- Skills shortages in priority curriculum areas.
- Employer Relation case volumes have doubled; capacity pressure.
- Absence rising (9.84 days) and complex health needs.
- Manager capability gaps affecting consistency.
- Increased adjustments requirements.
- Tight labour market limiting recruitment supply.
- Legislative changes requiring policy and training updates.

Members noted the ongoing difficulties in recruiting for specialist roles but were assured by the implementation of an applicant tracking system to streamline hiring and other ways to improve efficiency and cost-effectiveness.

The report highlighted the significant reduction in voluntary turnover, attributed to initiatives such as the aspiring managers programme, improved onboarding processes, and the introduction of 'settling in' periods with structured mentoring and development plans.

Members were provided with detailed absence statistics, compared to national benchmarks, and interventions such as occupational health support, targeted to reduce absence rates and ongoing analysis of absence drivers.

The Committee discussed ongoing leadership development programmes, monthly management training and the need for enhanced succession planning.

Members thanked J Thompson and C Hare for the update. They reflected on the variability of deep dive reports and agreed to provide clearer guidance for future deep dives which was welcomed by the authors.

Action: A Hindson

9 Internal Audit Reports - Paper GBGR&A25/727

James Godsmark and Lee Glover from Internal Auditors, Validera introduced the following reports which provided an update of progress against the Internal Audit Plan for 2025/26 and an overview of the reports completed since the last Committee.

a) Core Financial Controls – Adequate Assurance had been given to this audit.

b) Curriculum – Meeting Local Need - Substantial assurance had been given to this audit.

c) Progress Report – no concerns reported.

d) Draft Scope for People Team audit – discussions clarified that the audit would focus on the broader HR control environment rather than investigating specific incidents. Validera confirmed capacity to begin the audit promptly and agreed to finalise the scope and commence the HR control environment audit before the end of the academic year.

Action: Validera

e) Internal Audit Follow Up Actions – James Thirgood introduced a report which provided the Committee with potential options to improve the timeliness and compliance for Internal Audit recommendations.

He explained the College continued to face challenges to respond and implement Audit Recommendations Despite additional administration to improve compliance eight are currently passed the agreed delivery date. An action plan to improve compliance was proposed and discussed. It was recognised that it was important to agree the appropriate management level to which internal audits should be assigned and that the group be provided with targeted training on what was expected of them. Validera confirmed they were available to support training as required.

Members agreed the approach to implement a phased escalation process for overdue internal audit actions and ensure the correct assignment of action owners. The Committee emphasised this approach must be a supportive learning opportunity and not a punishment.

Action: J Thirgood

The Committee asked the Executive to ensure that individuals receiving internal audits complete the satisfaction surveys requested by Validera to provide timely and factual feedback for performance reporting. It was agreed J Thirgood would coordinate the collection of these responses to support the upcoming report on internal audit performance.

Action: J Thirgood

Members thanks Validera for the update.

10 MKCTS Audit Committee minutes from the meeting held on 8th January 2026

Members noted the minutes for information with no concerns raised.

It was agreed that a report regarding the progress and alignment of the MKCTS and MKC risk frameworks would be presented at the next committee meeting.

Action: J Thirgood

11 Any Other Business

The outlined plans for the next deep dive were agreed with a focus on Governors' interaction with technology, data security in Teams meetings.

Members discussed the balance between security and access, with the possible involvement of both internal staff and an external IT consultant to provide practical recommendations.

The Committee agreed to split the deep dive into two parts:

- addressing MFA for students and AI governance progress - internally
- examining the balance between security and access for Governors, to assess practical solutions – with external IT consultant support

It was agreed the scope would be drafted for both parts of the deep dive, with an emphasis on the need to resolve access versus security issues before the next academic year.

Action: A Hindson/S Cook

Members were mindful of ensuring the deep dive is useful to all parties and S Cook agreed to speak to C Hare to ensure an appropriate approach.

Action: S Cook

The agenda for 11 June 2026 was agreed.

12 Date of Next Meeting

The next meeting will be held on Thursday 11 June 2026 at 5pm in person at Medway.

The meeting closed at 19.06hrs.