

**College of West Anglia
Minutes of Audit & Risk Committee
Wednesday, 3 December 2025
9:30am – 12.00 noon
Meeting Room – Principal’s Suite, King’s Lynn Campus**

Present	Ray Harding	Governor (Chair)
	Dave Clark	Governor (Vice Chair)
	Sharon Edwards	Co-opted Governor
	Seb Ivanov	Governor
	Russel Liddington	Governor
	James Nash	Governor
Attending	Leisyaen Cox	Scrutton Bland
	Claire Sutherland	RSM UK Audit LLP
	Paul Harrison	Vice Principal Corporate Services
	Rob Petto	Assistant Principal Funding and Performance
	Jenny Quaif	Head of Finance
	Jules Bridges	Head of Governance

No.		Action
1	<p>Committee Members’ briefing with Auditors A confidential discussion was held prior to management attendance.</p>	
2	<p>Apologies for absence There were no apologies for absence from committee members however apologies were received from Paul Goddard of Scrutton Bland and Suzy Harper of RSM UK Audit LLP.</p>	
3	<p>Declarations of Interests There were no items of interest declared.</p>	
4	<p>Minutes of the previous meeting held on 24 September 2025 The minutes of the meeting held on 24 September 2025 were reviewed and agreed as being an accurate record.</p>	
5	<p>Matters Arising The progress arising from the previous meeting were summarised in the progress report and all actions reported had either been resolved or, where appropriate, an update had been provided on progress elsewhere on the agenda.</p> <p>It has been suggested that audit actions 43 and 44 are removed from the tracker due to the sensitivity of the changes in process. This was discussed under agenda item 8 below.</p> <p>It was noted that the three red (high priority) GDPR related recommendations have been reallocated. An update is provided for in item 15 below.</p> <p>All other completed items are to be removed from the report.</p>	HoF HoG
6	<p>Risk and Assurance Progress Report The report confirms the three internal audits completed in the year to date: Risk Management, Health and Safety Follow-up, and Human Resources, Recruitment and Retention. Agenda items 7.1 to 7.3 cover these reports.</p> <p>Safeguarding, T Level preparation and Maths and English audits have also been completed this term, and these reports will come to the committee at the next meeting to be held in February 2026.</p> <p>It was noted that the audit of the New Finance System (procurement) will be undertaken in January 2026 as originally planned.</p>	

7 Internal Audit Reports

1 Risk Management

The objective of the audit was to confirm that the college's risk register fully and adequately describes the risks that the college is exposed to, that the controls in place to mitigate these risks have been identified and recorded, that the risks have been appropriately assessed and the framework is embedded.

The assurance opinion was substantial (green status) with one low risk recommendation made to improve process and practice further. This related to a review of tolerated risk scores to ensure they are updated to reflect the current position. A couple of added value points were also raised, and governors suggested the addition of AI to the strategic risk register as an emerging risk.

HoG

2 Health and Safety Follow-up

The purpose of the audit was to review the progress made in implementing the recommendations raised during the 2024/25 health and safety audit.

In summary it was found that the college has made strong and demonstrable progress since the last review. Of the seven recommendations raised, four have been fully implemented and closed, and the three remaining are in progress, each of which now carry low risk. Based on the work completed, assurance can be taken that the college has effectively implemented most prior audit recommendations. Two new low risk recommendations have been raised, and one previous low risk recommendation has been partially reinstated because of the follow-up review.

Governors were mindful that the report highlighted that there are 119 risk assessments (low risk areas) overdue for review and questioned if this posed a risk if these remained overdue. There is a focus on key risks and priorities around technology and kitchen areas, and these are being completed. The Health and Safety Officer is working hard with teams to emphasise the importance of reviewing and keeping these up to date. The Health and Safety committee also has oversight of progress and reports will come back to the committee to evidence a declining number of risk assessments overdue in due course.

VPCS

3 Human Resources – Recruitment and Retention

The objective of the audit was to ensure that the college's recruitment and retention processes optimise the likelihood of the recruitment of new staff members and to ensure that the staff retention strategies are optimised to increase the likelihood that staff or staff knowledge is retained.

Part of the audit also reviewed the selection and appointment processes in place regarding disabled applicants and assurance was given that through sampling and testing, systems and practice applied was found to be appropriate.

Overall, the assurance opinion was substantial (green) with five low risk recommendations raised to improve the performance of the system of internal controls and five value added points were also made.

On page 71 of the pack, it was noted that the staff retention rate has improved by 13% and governors were interested to know what changes made have positively impacted. Promoting the full range of staff benefits, pay increases, staff surveys and a dedicated HR Recruitment Officer to name a few. It was noted that the CWA staff retention rate is comparable to other colleges and there were no specific incentives or initiatives offered by others that CWA could deploy. It was acknowledged that exit interviews of leavers are undertaken but the data is not collated to understand why staff leave and where they go but it was acknowledged that trend analysis may be useful in the future.

8 Progress on Implementing Agreed Audit Actions

The committee received the report and decided to retain items 43, and 44 on the tracker to ensure oversight of these points however due to the sensitivity of the actions it was agreed that wording could be redacted as appropriate.

HoF

Regarding item 29 which was raised from the payroll audit which entered the register in January 2024, governors noted that the deadline date has moved from January 2025 to 2026 and is now moved to August 2026. Acknowledging that this action is not material this has not progressed for several reasons but in the main cannot be progressed at this time due to staff absence in the CIS team who have the specialist skills to develop a timesheet claim form with auto functionality. It remains on the project list for the team to complete by the end of the academic year.

It was noted that items 52, 64, 69, 70, 73, and 79 were considered complete and the committee confirmed that these can be removed from the register.

HoF

R Petto joined the meeting at 10.10am

9 Funding Assurance Report (including Audit Update)

The DfE full funding audit has concluded with a small number of issues identified but then addressed prior to submission of the final 2024/25 funding claim. Findings were minor, however as previously advised a £27k adjustment was made in respect of vulnerable bursaries.

The 2024/25 RSM income testing is complete and while no funding issues were identified, a volume of observations, detailed in the Auditor's Findings Report (agenda item 10.1), have been raised in relation to apprenticeships, more than were raised as part of the DfE audit.

The committee was notified of an issue found in relation to Apprenticeship Change of Employers with the DfE. On the face of it, the college's approach has not been compliant with policy since April 2024, but the mechanics of the ILR/claims process suggest that the college is compliant. Support from the DfE has been sought but there is a risk that this could have funding implications. An explanation about co-investment and completion funding was explained which in summary is extremely complex and managing the co-investment payment from employers is foreseen to be problematic which will impact the college's ability to claim the 20% completion funding for the apprentice if not received from the employer.

The transition of apprentices to S4PL continues with 14 apprentices either complete or expected to complete imminently. There are 36 apprentices expected to transfer to S4PL; of these 10 have now been withdrawn by the college, part of the transfer process, with the others pending information from S4PL to enable the college to do this. Withdrawal will take place once S4PL have provided the required documentation.

It has been recently announced that from October 2026 there will be changes in apprenticeship assessment. Moving forward from a full End Point Assessment based approach to more on-programme assessment. The college is currently monitoring and will adapt systems/processes accordingly.

Changes to English and maths condition of funding in relation to 16-19 Study Programme learners took effect this academic year. The college is now sitting at 3.1% non-compliance but continues to work through all learners to gather the required evidence to substantiate a claim below the 2.5% tolerance rate. The condition of funding is not based on attendance but that the sessions have been planned for each eligible learner. The audit income testing for this is unknown as this is the first year that this condition has been applied so Auditors, RSM, will investigate this to see how the rules will be applied to provide assurance to the college that it is compliant with these complex funding rules.

RSM

10 External Audit

1 Auditor's Findings Report

Auditors confirmed updates since the release of the papers which included that their work of the completeness of other income (page 6 of the report) has now been completed so the drafted section (highlighted yellow) is correct. Regarding going concern governors, the report confirmed that no material uncertainties exist in relation to going concern for a period of at least 12 months from the date of approval of the financial statements.

CWA Developments Ltd is in a net liabilities position and is not actively trading. The DfE approval has been given post year end for the debt owed to the college to be waived. Post year end following the waiver of the debt the Board took the decision to wind down the company, and therefore the accounts are prepared on a non-going concern basis. No adjustments were made to the financial statements as a result of applying the non-going concern basis of accounting. Emphasis of the matter has been included in the audit report for CWA Developments Ltd highlighting the basis of preparation and the auditor's unqualified opinion is not modified in respect of this matter. It was further noted that the qualification of the audit report from CWA Enterprises Ltd has been removed this year and an unqualified opinion therefore issued.

Expenditure in relation to the Tower Block Roof repair has been expensed in the income and expenditure account as incurred and an impairment of £149k recognised in relation to the roof included in fixed assets.

The external auditor presented an overview of the content of their report highlighting pages 9 through to 30 which included the recommendations on internal controls that came to auditor's attention during their audit work. All 26 of the recommendations were not significant control recommendations but other control recommendations and 5 of the 26 recommendations were repeat findings from the 2022/23 and 2023/24 external audit work noting that these related to the implementation of the new finance system, now predicted to go live later this academic year. The other 21 findings related to apprenticeships however it was noted that these are data points and not material risks raised.

The final pages of the auditors' report include an appendix which sets out in numerical form the adjustments made to the financial statements. The first page (page 32) shows the summary of unadjusted misstatements totalling £370k although notably £410k of this related to the impairment of investment in CWA Enterprise and a £40k adjustment of holiday pay (staff costs). Finally, the external auditor confirmed no unadjusted or adjusted misstatements in CWA Enterprises Ltd or CWA Developments Ltd.

It was further reported that auditors will not be seeking additional representations in addition to those representations which are requested on all audit assignments. The letter of representation therefore will be standard and prepared with the final copy of the financial statements for the Corporation meeting to be held on 17 December 2025.

RSM

Governors questioned if the old learner support funding (repeat finding) was likely to be resolved. It was acknowledged that the DfE are aware of a creditor balance and it is confirmed that is required to be repaid although the exact figure is still to be confirmed but thought to be in the region of £360k to £400k, as per the balance sheet.

2 Report and Financial Statements for the year ended 31 July 2025

Subject to some other final minor anomalies (pages 48 and 49 and payment performance paragraph on page 8) to be corrected governors were content to accept the statements as presented and will recommend they are approved by the Corporation at the meeting to be held on 17 December 2025. It was noted that the Finance and General Purposes committee received an earlier version of the accounts and were content with their preparation and the satisfactory reconciliation of the numbers.

Chair

Finally, the committee, management and auditors congratulated the work of all involved to prepare and complete the financial statements for the year ended 31 July 2025.

3 Draft Letter of Representation

It was noted that the letter of representation will be prepared and circulated following the meeting.

RSM

R Petto left the meeting at 11.05am

11 Annual Report of the Audit Committee 2024/25

The report has been compiled in readiness for the Chair of the committee to present to the corporation. The report provides the committee's opinion on the adequacy and effectiveness of the college's framework of governance, risk, and control and how the

	<p>college has secured value for money. It was noted that the table on page 6 and 7 is to be updated and an unqualified opinion mentioned for CWA Developments.</p>	HoG
	<p>Subject to these amendments being made the committee approved the report for the Chair to present to the Corporation at the meeting to be held on 17 December 2025.</p>	Chair
12	<p>Self-Assessment Questionnaire</p>	
	<p>Governors commented that the college responses in the SAQ didn't always necessarily correspond with the criteria required. It was confirmed that this is a formatting issue with the document that the Vice Principal Corporate Services will try to resolve before presenting it to the Corporation at the meeting to be held on 17 December 2025.</p>	VPCS
	<p>Despite the formatting issues the committee was content to approve the questionnaire and will recommend it be approved by the corporation, and signed by the Chair and the Accounting Officer, at the meeting to be held on 17 December 2025.</p>	Chair
13	<p>Risk and Internal Controls Update</p>	
	<p>The report covered several topics for governors to discuss, personal data breach, cyber security, repairs to the Tower Block Roof, New Finance System, and 2024/25 accident statistics.</p>	
	<p>There are still some low-lying issues to resolve on the Tower Block works, but all major works are now complete.</p>	
	<p>The issue with the subcontractor concerning the personal data breach remains unresolved.</p>	
14	<p>Risk Register Review</p>	
	<p>The risk register has been updated by risk owners since the last meeting of the committee, and the Corporation.</p>	
	<p>The number of critical risks (red) has increased from 3 to 4 between the months of October and November 2025. There is an increase in the number of major risks (amber) which has moved from 13 to 14 and the number of risks in the moderate zone (light green) has stayed the same at 4. Two new risks have entered the register (Risk R030 and R031) with scores of 12 (red).</p>	
	<p>The review of the Board Assurance Map indicates that the control environment is generally sound. There is notably one area of concern (risk R012) where the assurance level is yellow which indicates a medium level of confidence/assurance with most management actions implemented. It was noted that the business continuity, and disaster recovery plans need to be tested to provide assurance that business arrangements can continue or sufficiently recover post incident. A desktop scenario test is planned in the new year.</p>	
	<p>Governors asked if cyber insurance was worth taking although there was scepticism of its value given that insurance is not a preventative and, in some cases, has been difficult to evidence a claim. The college has planned to apply for cyber essentials plus in June 2026.</p>	
	<p>New risk R030 relating to A Level provision is hoped to reduce in score as the year progresses and positive impact against the action plan is realised.</p>	
	<p>Further to the internal audit of risk management the HoG proposes convening a group of governors to review the risk tolerance scores at the next review point of the register.</p>	HoG
15	<p>GDPR/DPO Report (inc. FOI/SAR & Whistleblowing Cases)</p>	
	<p>At the last meeting (September 2025) of the committee progress had been downgraded to 75% (from 80%) as more evidence was requested to demonstrate completion of the recommendations made. Some evidence has been gathered which has pushed progress up to 77% and managers continue to be chased to progress the remaining recommendations to complete our compliance progress journey.</p>	
	<p>As highlighted by governors previously the three red (high priority) recommendations remain red, but these have been reallocated. However, it was recognised that two of the</p>	

three recommendations will take time to resolve as we identify and issue Data Processing Agreements with every company/supplier who processes data on behalf of the college.

Since the last report to the committee, the Head of Governance has dealt with 8 data breaches, which were not reportable to the ICO and 3 Freedom of Information Requests, all satisfied within the 20-working day timeframe. In addition, 8 DSARs (Data Subject Access Requests) have been satisfied within the one-month timeframe. Currently it was noted that there is one case of whistle blowing under investigation. Governors were interested to know if any of the DSARs raised by staff could arise as a further employment law issue. The Head of Governance provided an overview and suggested that the information requested was unlikely to inflame further pursuance.

16 Review of Contracts Register, Waivers, and Debt Write-Offs

The details of the top five contracts greater than £10k were detailed in the report and appendix 1 detailed the contract values greater than £10k entered into since the last meeting and appendix 2 detailed all active contracts greater than £10k.

17 FE Emerging Issues – Autumn 2025

The briefing helpfully highlighted a number of emerging issues in the sector including an update to DfE funding rules, new counter fraud checklists, guidance on Cyber insurance, key HE updates, insights into the new Ofsted Framework and the latest RSM Emerging Risk Radar.

C Sutherland and L Cox left the meeting at 11.35am

18 Any Other Business

Confidential Item under paragraph 17(2) of the Instrument and Articles of Government
This agenda item was deemed to be confidential.

19 Chair's Items for Briefing to Corporation

- Three internal audits have been completed in the year to date: Risk Management, Health and Safety Follow-up, and Human Resources, Recruitment and Retention.
- The DfE full funding audit has concluded with a small number of issues identified. As previously advised a £27k adjustment was made in respect of vulnerable bursaries.
- The 2024/25 RSM income testing is complete and while no funding issues were identified, a volume of observations, detailed in the Auditor's Findings Report have been raised in relation to apprenticeships.
- An issue has been found in relation to Apprenticeship Change of Employers which could have funding implications. Support from the DfE has been sought.
- The transition of apprentices to S4PL continues with 14 apprentices either complete or expected to complete imminently. There are 36 apprentices expected to transfer to S4PL.
- The tolerance level for the new maths and English condition of funding is 2.5%. The college is currently sitting at 3.1% non-compliance but continues to work through all learners to gather the required evidence to substantiate a claim.
- The committee recommends the corporation approves the financial statements for the year ended 31 July 2025 and signs the letter of representation and self-assessment questionnaire.
- The Chair of the committee will present the annual report of the Audit and Risk committee to the corporation at the meeting to be held on 17 December 2025.
- College GDPR compliance is at 77%.

Chair

20 Date and Time of Next Meeting

Wednesday 25 February 2026 at 9:30am (Remote Meeting, via TEAMS)

Meeting ended at 11.50am