

Business Continuity Policy



Education & Skills
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INTRODUCTION

Arena Learning is a national training provider providing education and training nationally.

This policy sets out the means to provide a flexible response framework so that Arena Learning can:

- Respond effectively to a major disruptive occurrence (incident management) across the business.
- Maintain delivery of critical activities during an incident (business continuity)
- Return to business as usual (resumption and recovery) as soon as feasible after an incident.

Applies to

This policy applies to all our premises and functions and should be read in conjunction with our individual departmental/site business continuity plans and emergency procedures and used in conjunction with any landlord or shared site procedures that may also apply.

Reason for policy

This Business Continuity Policy (BCP) details steps that should be taken before, during and after any disruptive occurrence to maintain the delivery of critical services and financial viability of the business. The impact of any serious disturbance may affect the business delivery of education, safety/welfare of colleagues and learners, it may have financial consequences, reputation damage or possible environmental consequences. The main objectives of this policy are:

- To safeguard the safety and welfare of colleagues, learners, and visitors and where applicable the general public.
- To resume provision of services at the earliest opportunity and, where possible, secure a continuation of learning for learners.
- To maintain the identity of the company and limit financial consequences
- To limit any reputational damage
- To return business as normal as soon as possible after the incident and limit the impact on our customers and learners.

POLICY

Purpose

To provide guidance and support to enable us to tackle the impact of severe disruptions due to a variety of one-off, but credible, causes. It will co-ordinate the response of all our departments alongside their individual business continuity plans to ensure business critical functions are reinstated as soon as possible, while full restoration of all services is planned and implemented on a concurrent basis.

Circumstances

The policy will be activated in response to an incident causing significant disruption to the business, particularly in delivery of key or critical activities e.g.

- Loss of key staff or skills due to above normal levels of absenteeism e.g., illness (pandemic)
- Total or partial loss of utility provision or critical systems prohibiting delivery of services
- Denial of access to facilities due to damage
- Loss of a key resource delivering critical support
- Serious injury or death
- Release of toxic or harmful materials in the vicinity

The above list is not exhaustive and other circumstances may trigger the plan being activated.

Business Recovery Timescales

In the event of a situation which threatens business continuity, there are deemed to be a number of business functions which must be maintained or reinstated as a priority. A recovery time objective (RTO) has been assigned to each of these functions as shown below.

Function	Recovery Time Objective (RTO)
Leadership – Business Critical Response Team	2 hours
Safeguarding and Prevent services	2 hours
Health and Safety assessment	1 day
Communication to Stakeholders/Learners/Employers	1 day
IT recovery assessment	1 day
Insurance assessment	5 days
Financial transactions	5 days
HR	4 hours
Website/social media	4 hours
E-Portfolio	1 day
Continuation of Learning	1 day
Learner Support	1 week
Inductions	1 week
Marketing	1 week
Curriculum Services	1 week

Tendering	1 week
Exams and Quality Support	1 week
Learning Centres	1 week

Some of the areas listed may be temporarily suspended during any disruptive occurrence however they must be reinstated as soon as is viable based on the RTO listed here. Any arrangements to adjust staffing levels in different areas will be by negotiation with line managers and authorised by the appropriate member of the Senior Leadership Team.

Escalating a Serious Incident

All serious incidents should be reported to the relevant Director or Head of Health and Safety immediately afterwards who will then inform relevant staff to respond. If the disruption has resulted in the loss of access to one of our outreach site's, the ERT meeting should be held at one of the other company sites nominated by the Managing Director. Any out of hours incident, would, in the first instance normally be reported via internal monitoring systems to the on-call security response teams.

Responsibility for Plan Activation

A nominated Emergency Response Team (ERT) will be activated by the MD as detailed in Appendix 2 of this policy as soon as possible after the incident. A member of this team will be responsible for standing down this plan once everything is returned to business as usual. Members of the ERT and any deputies will hold site specific information for landlords, IT managed services and other business critical information that may need to be accessed during any event. This must be always kept secure and checked for any changes on a 6-monthly basis by the Head of Health and Safety, Estates and Environment.

A flowchart in Appendix 3 of this policy gives an overview of how this plan can be activated.

Individual Departmental Business Continuity Plans

Each department has their own business continuity plan that describes how key incidents will be managed and details:

- How information sharing will happen during/after the incident to individual teams and the wider business
- Alternative premises that can be used short/long term until normal service is resumed
- Key staff who will be responsible for decisions in relation to their own departments

Upon activation of this plan, the MD, or their nominated deputy, will trigger the emergency response team to undertake their responsibilities (see roles and responsibilities section in Appendix 2). The primary objective of this team is to manage the developing situation and minimise harm and danger to:

- Colleagues
- Learners
- Visitors to the site/s
- The building, contents, and other assets

Each of the plans are kept in the local shared drive with a hard copy held by the relevant departmental managers should access to shared IT services be compromised. The plans will be regularly updated should any changes occur.

Emergency Site File

Any evacuation is dealt with via our internal fire evacuation procedures or on advice from the emergency services/landlord. The emergency file should be stored in the reception/admin office of each site. Members of the ERT will also have site specific information kept in a separate secure location. The on-site file should contain the following items:

- Emergency telephone numbers
- List of on-site fire wardens
- List of on-site first aiders
- Floor plans for Arena Learning specific areas and associated areas if required
- Disaster recovery policy
- Run, Hide, Tell Guidance
- Current Personal Emergency Evacuation Plans (PEEP) for site staff requiring one

Any other critical items, e.g., up-to-date contact information for staff, learners, parents/carers, will be available via any internet-enabled computer and kept update the Head of Funding and MIS. The file should be taken out of the Arena Learning premises by the nearest person, only if it is safe to do so. The emergency file will be checked termly for accuracy of information by the Head of Health and Safety.

Testing the Plan

This policy will be tested annually for major incidents across all areas of the business including a disaster recovery plan.

This has been reviewed and approved by Arena Learning, Director Mark Green.

A handwritten signature in black ink, appearing to be 'M. Green', with a small dot above the 'M' and a horizontal line extending to the right.

DEFINITIONS

Disaster Recovery - Involves a set of policies, tools, and procedures to enable the recovery or continuation of vital technology infrastructure and systems following a natural or human-induced disaster.

Critical Activities - Business activities and processes that must be restored in the event of a disruption to ensure the ability to protect the organisation's assets, meet organisational needs, and satisfy regulations.

Contingency Plan - A plan designed to take account of a possible future event or circumstance to enable suitable reaction to incidents and plan to support the immediate response, reinstate key business operations and implement recovery processes, followed by review to action any future changes to BCP.

APPENDIX 1

Business Recovery Immediate Actions

Under the direction of the MD, or deputy and working in consultation with the Emergency Services, the ERT will:

- Ensure all colleagues, learners and any visitors are all accounted for
- Liaison with emergency services, landlord or any other 3rd parties
- Identify those persons who are allowed access to the incident area and restrict access to anyone else.
- Identify any required physical access control systems rendered ineffective and, where applicable, implement alternative physical protection methods, including, where necessary, the use of a physical security presence
- Determine, as quickly as possible, whether any personal data has been compromised and whether all data can be adequately safeguarded from unauthorised exposure - advise the ERT and ensure that the required levels of protection are implemented.
- Direct the removal of valuable equipment and records to a safe location.
- For sensitive information that may have been compromised (staff details, learner records, etc.), ensure that the correct handling rules are being followed.
- Confirm that IT back-up policies are being followed and that the correct items are being transferred to a back-up store.
- Check that the restoration plans, and fallback arrangements contain adequate contingency so that any recovered service will not be affected by any relocation to the new permanent facilities.

Long Term Actions

Ensure that any plans made take full account of the protection requirements. These will include ensuring that:

- The correct level of security has been implemented at any premises which are used as a temporary measure.
- Any Arena Learning Standing Operating Procedure (SOP) reflects any changes made to procedures caused either by the incident or by the return to normal service strategy.
- Access control software has been correctly restored to ensure protection of Arena Learning information.
- Where appropriate, ensure that security or administration staff implement a policy of stopping and searching vehicles going off-site to ensure that staff or contractors are not removing items without permission.
- Ensure that any required IT access control software used by any affected service is still fully operational – or else implement the necessary physical controls to restrict access to equipment.
- Ensure that audit logs are being used, where available, and that they are being checked for violations.
- Ensure that any temporary staff members have the necessary authority/permission to carry out their function.
- Ensure that all items being transported to a temporary location are protected and accounted for

- Make staff aware of the need to report any actual or potential security breaches - ensure that these are logged, investigated and actioned.
- Any temporary facilities being used for service delivery are checked to ensure that no Arena Learning information or material is left after they have been vacated.

Long-term recovery may be affected by decisions made during the assessment/containment phase, so recovery issues should be considered by the ERT from the outset.

APPENDIX 2

Emergency Response Team (ERT) Roles and Responsibilities

The following roles and responsibilities should have alternative staff ready to deputise in the event of holidays or sickness.

Incident Officer: Managing Director - responsible for activation of this policy and management of any disruptive occurrence. Duties to include:

- Chair ERT team meeting and co-ordinate the response based on events and how they unfold.
- Liaise with Arena Learning Governors and stakeholders.
- Allocate resources.
- Be prepared to answer questions from the media.

Curriculum Delivery: Managing Director – responsible for management of the incident from a business perspective while ensuring the rest of the business operates as normal. Duties to include:

- Liaise with all affected delivery managers to agree contingency plans for their learners to include assessing learning and tutor support requirements.
- Decide on requirements for access to alternative venues if required liaising with local providers where possible.
- Communication with learners and parents as required.
- Notify awarding and funding bodies as required.

Stakeholder Communication: Business Development Director– responsibility for informing any employers who may be affected by the incident and how it may affect their learners. Duties to include:

- Ensure any of our employers are informed of any incident where required and how it may impact them in the short term.
- Outline any alternative arrangements that have been made e.g., different premises etc.

Incident Co-Ordinator: Business Development Director – responsibility for onsite management of any incident, being the main liaison between the CEO/ERT and the scene of the disruption. Duties to include:

- Liaison with the Incident Officer to assist in coordinating the response.
- In cases of suspected illegal/terrorism activity, contact the police.
- Meet and greet emergency services as they arrive with a floor plan of the building, if possible
- Liaison between the emergency services and our colleagues
- Ensure all colleagues, learners and visitors are safe and accounted for
- Ensure all significant occurrences and decisions are recorded, together with reason for decision made.

Staff and Communications Lead: Business Development Director – responsibility for all external communications/announcements and any internal communication to staff on an ongoing basis. Duties to include:

- Provide clerical and practical assistance to the Incident Officer
- Immediately instruct staff not to leave the rendezvous point until told to do so.
- Impart factual information to colleagues.
- Agree key information to be given to learners alongside the Managing Director

Welfare Officer: HR Manager for the affected premises – responsibility for the immediate evacuation of the premises and the safety of all affected colleagues, learners and visitors. First point of contact for the emergency services until the incident coordinator arrives onsite. Duties to include:

- Marshal learners, staff and visitors at the nominated assembly point
- Arrange for transfer of everyone to place of safety if required.
- Arrange for warm, dry shelter for everyone in the short-term if required.
- Turn off gas, electricity, etc., if this can be done safely.
- Deal with immediate welfare matters: distress, injuries, domestic responsibilities, etc. alongside the emergency services
- Co-ordinate the sending home of learners and colleagues based on advice from the ERT.

Premises Officer: Head of Health and Safety – responsibility for managing the building alongside the Centre Manager once the emergency services have completed their initial activities and the area is safe. Duties to include:

- Be responsible for building security while the building if the building is not accessible.
- Salvage critical documents/equipment, if this can be done safely - the centre manager should be in possession of a list of critical items.
- Ensure signage and notices are in place on all doors/boundaries to prevent access to dangerous areas.
- Liaise with other tenants/neighbouring buildings where required.
- Alongside the Operations Director any transfer to alternative premises and arrange for them to be operational within agreed timescales including furniture and equipment

Human Resources: HR Manager – responsibility for ensuring staff welfare during any event including contact with immediate family members where required. Duties to include:

- Ensure that all colleagues are aware of all relevant emergency contact numbers.
- Upon direction of the ERT, establish contact with immediate family members of any colleagues or learners who have been injured.
- Ensure that all colleagues are aware of what assistance is available in recovering from a major disaster, specifically medical and insurance assistance and, where applicable, counselling

Finance Officer: Jackson Stephens Accountants – responsibility for managing costs associated with any event. Duties to include:

- Set-up project accounting and assign a project code to the incident.

- Inform all managers of how any incurred bills are to be invoiced
- Monitor all travel expenses, labour charges and any other costs relating to business continuity.
- Co-ordinate with the ERT and our insurers regarding claims, etc.
- Arrange for emergency funding from central sources for necessary repairs of buildings and replacement of specialist equipment.
- Process all costs associated with the incident to the relevant ledger code.
- Instruct colleagues how to record additional hours, expenses, etc. relating to the incident.

Information and Data Recovery Officer: Head of Funding and MIS. Duties to include:

- Organise the retrieval and restoration of data.
- Prioritise access to systems to ensure minimum disruptions to the operation of the business.

APPENDIX 3

Plan Activation Process

The following flowchart details how the ERT will be activated should we encounter a disruptive occurrence across the company.

