

Business Continuity Policy

Reference: Version	Final	
Policy Originator:	Deputy Principal Finance & Resources	
Equality Impact Assessed:	March 2021	
Approved by:	Board	
Date Approved:	March 2021	
Review Interval:	Bi-Annual	
Last Review Date:	None	
Next Review Date:	March 2023	
Audience:	All Staff and Governors	

1.0 Policy Statement

1.1 The Business Continuity Policy ("the Policy") forms part of South Staffordshire College's ("the College") internal control and corporate governance arrangements.

- 1.2 The Policy is issued as part of College's overall system of risk management and control, as set out in the Risk Management Policy and Financial Regulations. The College's risk management control processes involve the identification, evaluation and management of significant risks faced by the College in achieving its goals, which are under regular review by the Executive Leadership Team, the Audit Committee and the Corporation.
- 1.3 The College has two documents to deal with the different phases of an incident. The Critical Incident Plan (CIP) deals with the initial response to any significant incident, while the Business Recovery Plan (BRC) is issued to support members of staff in the process of returning the College to normal operations.
- **1.4** As soon as possible after an event has developed, the Principal, or in their absence the Deputy CEO or the Principal Finance & Resources or a member of the Executive Leadership Team, will assess the situation to see if the CIP needs to be put into effect.
- 1.5 The Incident Management Team (IMT) deals with any incident which requires the CIP and/or BRC to be put into place. The Business Continuity Working Group deals with the ongoing review and development of the College's business continuity arrangements.
- **1.6** Staff are asked to ensure that they read and understand the contents of the Policy and to ensure that they remain aware of its contents in order to act appropriately should an issue affect the College.

2.0 Scope

- **2.1** This Policy applies to all areas of the College including potential subsidiaries and will involve all staff and governors.
- **2.2** Other policies and procedures linked to this Policy include:
 - Financial Regulations
 - Risk Management Policy

3.0 General

3.1 The main aims of the Policy are: -

- To create an awareness of the need for business continuity planning and development;
- Provide a planning framework for responding to major incidents;
- Identify major areas of risk for business continuity planning;
- Outline the responsibilities of individuals and groups;
- Identify staff members who should be members of the Incident Management Team and Business Continuity Working Group;
- Outline training and testing needs.
- 3.2 The main aims of the Plans are: -
 - To prevent or limit loss of life or injury, and to limit or minimise damage to assets and/or buildings (incident management);
 - To bring the College back into full operation with minimal disruption to students and staff (business recovery).
- **3.3** The main aims will be addressed by coordinating the response of all departments and staff in the event of a major incident to ensure that business critical functions are reinstated as soon as possible, and all services are restored as quickly as practical.

4.0 Areas of Risk

- **4.1** The major areas of risk for business continuity for the College have been identified as:
 - Closure or partial closure of a centre due to fire, loss of services, flood, adverse weather conditions, bomb threat or other incident;
 - Loss of life and/ or major injury sustained on or off site, either by accident or by incident;
 - Major infection/ illness forcing closure or partial closures of a centre;
 - Major loss of IT capacity due to theft, hacking/virus/ equipment failure or damage.

5.0 Employing the Plans

- **5.1** The CIP will come into effect when a major incident is taking place or has taken place.
- **5.2** There may be incidents where an immediate response is required to protect life and property, for example a gas leak is detected or an immediate bomb threat is received. In this case, it is not practical to convene an IMT meeting and an immediate response is necessary.
- **5.3** Immediate action should be taken by the person discovering the risk. This would involve:
 - Contacting emergency services;
 - Notifying a line manager or ELT member;
 - Receiving and conveying instructions from either Party.
- **5.4** The IMT would be called together to consider its response to the incident when practical.

- **5.5** The Critical Incident Plan would cover general guidance on how to deal with such incidents, although it is accepted that individual instances may well be unique.
- **5.6** Once the incident has passed the College would naturally look to return to its normal conditions, and the BRP will be enabled to support this.

6.0 Responsibilities

Corporation

- **6.1** The Corporation is responsible for: -
 - Safeguarding the assets of the College and overseeing the procedures in place for managing business risks.
 - Setting the tone and influencing the culture of risk management within the College, including the level of acceptable risk on a case-by-case basis;
 - Approving the Policy on the advice and guidance of the Audit Committee on an annual basis.

Audit Committee

- **6.2** The Audit Committee will be responsible for: -
 - Advising the Corporation on the system of internal controls, risk management and governance. As business continuity impacts on all of these areas, the Audit Committee will be required to approve and recommend the Policy to the Corporation.
 - Reviewing the Policy on an bi-annual basis;
 - Providing advice to the Corporation on the effectiveness of the internal control system;
 - Receiving a detailed report or update on business continuity issues.

Principal and ELT Members

- **6.3** The Executive Leadership Team is responsible for the internal approval of the Policy.
- **6.4** Any decision on the closure, or part closure of a site that would affect a number of staff and students should be taken by a senior post holder. The College has an emergency closure procedure which allows for the closure of sites and communication to stakeholders.
- 6.5 As soon as possible after an incident has developed, the Principal, or in their absence the Deputy CEO or Deputy Principal Finance & Resources or a member of the Executive Leadership Team, will assess the situation to see if the CIP needs to be put into effect.
- 6.6 On implementation of the CIP, the Principal or their appointed deputy should convene the Incident Management Team as soon as possible.

6.7 The ELT will have an overview of the College's business continuity arrangements. This Committee will also review the minutes and actions of the Business Continuity Working Group.

Deputy Principal Finance & Resources

- 6.8 The Deputy Principal Finance & Resources is responsible for the maintenance of the Policy and the Plans, including contact details of members of the Incident Management Team and the Business Continuity Working Group. The Policy should be reviewed every two years.
- **6.9** The Deputy Principal Finance & Resources is responsible for the upkeep and communication of the Emergency Closure Plan, which deals with the communication process for closing a College centre.
- **6.10** The Deputy Principal Finance & Resources is responsible for testing and rehearsing the Plans with the support of the Incident Management Team and/or the Business Continuity Working Group (see section 6.12 and 6.16).
- **6.11** The Deputy Principal Finance & Resources is also responsible for the training of members of the Incident Management Team and Business Continuity Working Group (see section 6.16).

Incident Management Team (IMT)

- **6.12** The IMT has responsibility for the implementation of the CIP during an incident. Core membership is as set out in appendix A, and all members should hold a copy of the Plans at work and at home.
- **6.13** After any incident involving the Plans, the IMT are responsible for feeding back to the Business Continuity Working Group, via the DP Finance & Resources, any issues or recommendations arising from the implementation of the Plans.

Team Leader of the IMT

- **6.14** The Team Leader will normally be the Principal, or in their absence the Deputy CEO or Deputy Principal Finance & Resources or a member of the Executive Leadership Team. They will involve all those members of the IMT as are necessary to deal with the crisis situation and the aftermath, plus other relevant personnel as needed.
- **6.15** The Team Leader will be responsible for officially declaring an incident over and allowing the CIP to be closed down. A decision to launch the BRP may then be taken.

Business Continuity Working Group (BCWG)

6.16 The BCWG will meet on an annual basis as per its terms of reference. Given the size of the

Group and seniority of the members, it is not practical to gather the Group together on a regular basis and it will be a better use of time and resources to meet with smaller groups and/or departments to review individual issues.

- **6.17** The BCWG is responsible for the identification of and prioritisation of critical business processes within the College, and the business impact assessment of the loss or impairment of these processes.
- **6.18** The BCWG is responsible for devising appropriate methods and processes for the recovery of the critical business processes
- **6.19** The BCWG is responsible for the review, development and update of the Plan, and should debate developments in the field of business continuity internally and externally.

Directors of Faculty and Heads of Service

- **6.20** Directors of Faculty and Service are responsible for raising awareness of business continuity in their departments and to distribute relevant information and materials to their teams.
- **6.21** Department Heads should have their own recovery plan and/or procedures to aid emergency and business recovery in a given incident. This departmental plan should support the College Plan but should focus on the departments own functions including student welfare and support in curriculum areas.
- 6.22 In incidents which are unlikely to affect the College as a whole, these departmental plans may be initiated by the Departmental Head, who should inform the Principal, Deputy Principal Finance & Resources or a member of the Executive Leadership Team of this decision.

All Members of Staff

- **6.23** All staff are responsible for ensuring that they operate at College in such a way as to minimise the risk of a business interruption incident occurring.
- **6.24** Staff are obliged to raise with the BCWG or their line manager any real or perceived risk which may impact on the business continuity of the College.

7.0 Training and Testing

Training

- **7.1** It is essential that Directors of Faculty and Services Areas, the IMT, and BCWG are updated with:-
 - Changes to the Policy and Plans;
 - Changes to the members and details of the various groups;
 - Significant changes to critical business functions and processes;
 - Links with other policies.
- **7.2** Training for the various groups should be carried out regularly and at least once per year. Training may take the form of updating or rehearsal.

Testing

- **7.3** Testing of the Plans should be carried out annually by the DP Finance & Resources. The testing should include:
 - Checks of staff members in post and their contact details;
 - Check that all members of the distribution list (see the appendices) retain copies of the Plan at work and at home:
 - Check that there are no additional or redundant business processes;
- **7.4** Rehearsal of the Plan should be carried out annually by the DP Finance & Resources supported by the IMT and the BCWG. The rehearsal should: -
 - Involve a walk-through desktop exercise based on varying scenarios. These scenarios should reflect the areas of risk in section 3;
 - Generate feedback to help further develop and refine the Plans (and Policy) in the future.

Appendix A – Incident Management Group

Name	Title	Areas of Responsibility	Ext	Home/ Mobile Telephone
Claire Boliver	Principal and CEO	Overall responsibility Governors		
Kirk Hookham	Deputy CEO	Student matters		
John Snow	DP Finance & Resources	Finance/IT/ Estates/ MIS/Transport		
Kim Vaughan	AP Learner Services	Learner Support/ Safeguarding/ Marketing		
Karen O'Reilly	AP Human Resources	Payroll / HR		
David Cousins	AP Curriculum	Curriculum matters		
Karen Turley	AP Quality	Quality / HE		
Julie Evans	Director of MIS	MIS / Exams /		
Hannah James	Head of Marketing	External communications		
Jason Whitaker	Director of IT and Projects	IT/ Systems/ Projects		
Rob Collard	H&S Manager	H&S / Insurance matters,		
Ali Hanson	Head of Learner Services	Student Services / ALS / Safeguarding		
Tracy Godfrey	Financial Controller	Finance		
Chris Ashforth	Head of Estates	Maintenance, Buildings		
Andy Cartwright	Director of Faculty	Curriculum		
Marcus Roberts	Director of Faculty	Curriculum		
Chris Hopkins	Director of Faculty	Curriculum		

John Renshaw	Director of APPEE	Curriculum	
		(Employers)	

1.1 This core team may co-opt or invite others as required to deal with individual issues. The Principal will liaise with the Clerk to the Corporation who will also keep up to date contact details for Governors.