

# **BUSINESS CONTINGENCY POLICY**

## Statement of Intent

The company is committed to its customers (learners and employers), employees, shareholders, suppliers and regulators to ensure the effective availability of essential products and services in the event of an emergency or disaster situation.

The purpose of Business Contingency Policy is to establish and support a comprehensive programme for business continuity, disaster prevention and total recovery of the company operations and business activities during a business interruption event. Also to ensure that the systems to ensure back-up of relevant business systems, and back-up and restoration of data are effective.

The company recognises the importance of a comprehensive Business Contingency Plan to ensure the; health, safety and continued availability of employment of its employees, and quality teaching and training provision for those we serve.

The company requires the commitment of each employee, associates, departments and suppliers to support the objectives required to protect the company assets, mission, values and survivability.

## Definition and Scope

This policy applies to all company employees, facilities and IT systems at all locations. The company shall be prepared for scenarios including, but not limited to, natural disaster, pandemic, power outage, hardware/telecommunications failures, data corruption, fire, explosion, flooding, and chemical, biological and nuclear hazards. These events may be local in nature, rendering the company premises inaccessible. This policy provides guidance for the resumption and recovery of time sensitive business operations in accordance with pre-established timeframes as well as ensuring that adequate plans are in place for the less time sensitive business operations in order for the company to process and fulfil orders.

## Definition of Business Contingency

The company recognises the potential strategic, operational, financial and stakeholder support risks associated with service interruptions and the importance of maintaining viable capability to continue the company's business processes and responsibilities to its customers (learners and employers), employees, shareholders, suppliers and regulators.

## Responsibility & Development

Development, implementation, testing and review of the Business Contingency Plan will be the responsibility of the board of directors and senior leadership team. Resolution of issues in the development of or support for all plans should first be coordinated with the Business Contingency Planning team and appropriate internal representatives and external organisations. Each division is responsible for communicating its current and comprehensive Business Contingency Planning (BCP) requirements to function. When implemented, the plan should include those procedures and support agreements, which ensure on time availability and delivery of required services.

## Policy compliance certification

To meet compliance requirements, the Business Contingency Plan should include; appropriate procedures, staffing arrangements, tools and workplace planning requirements necessary to meet approved deliverable requirements.

## The Business Contingency Plan

The Operations board of directors and senior leadership team shall develop the Business Contingency Plan to recover from an institutional crisis and provide, at the very minimum, the ability to recover critical processes in less than three days. The recovery plans for a local crisis and recovery of critical processes greater than three days shall be developed by the Operations board of directors and senior leadership team, and the operational management team responsible for each department.

During a business interruption event, the senior leadership team adopts the mantle of the 'Crisis Management Team' (CMT) and shall activate the Business Contingency Centre (BCC) at the company's main offices if required.

ELA's Senior Leadership Team consists of a Chief Executive Officer, Chief Operating Officer, MIS Manager, Business Development Manager, Systems Manager, Head of Apprenticeship Operations, Senior Quality and Safeguarding Manager.

In some cases, (and in the cases of remote/home workers) it may not be necessary to relocate staff to the BCC. To address local crisis situations, alternate approaches for resumption including remote work, working from other office buildings, etc., shall be identified for affected business units working with the respective management and CMT Coordinator(s), facilities and IT teams. Needless to say, alternative operating locations will be provided (if needed), as will the provision and management of transportation needs.

## Testing

The Business Contingency Plan should be tested at least annually to ensure credible recovery preparedness. The scope, objectives, and measurement criteria of each test shall be determined and coordinated by the Crisis Management Team on a per event basis. The purpose of testing shall also be to ensure that systems to ensure back-up of relevant business systems, and back-up and restoration of data are effective

## Training

Business Contingency training for the Crisis Management Team, Operations Board of Directors, management team and staff is essential for effective resumption and recovery of operations.

The Operations Board of Directors and Senior Leadership Team shall ensure training in line with current company business processes, latest technologies, tools, international standards and regulations that guide the development of disaster recovery plans.

Crisis Management Team, Operations Board of Directors, Management team and staff must be trained about their business resumption and recovery roles in coordination with the Business Contingency Plan.

Internal audit, as part of its work programme, will review the business contingency plans periodically to ensure compliance of the overall Business Contingency Programme with International Standards such as ISO.

## Plan Exercise/Testing

To ensure that the plan is valid, that it will actually work in an incident, and to ensure staff feel more prepared in the event the plan is required, a test will be performed at a minimum once per year.

A summary log of tests conducted will be recorded and updates to the plan communicated to the business.

Minor incidents or events that do not require the full implementation of the plan but can contribute towards improvements to the plan will also be recorded.

## Plan Activation

This Plan will be activated in response to an incident causing significant disruption to normal service delivery/business, particularly the delivery of key/critical activities.

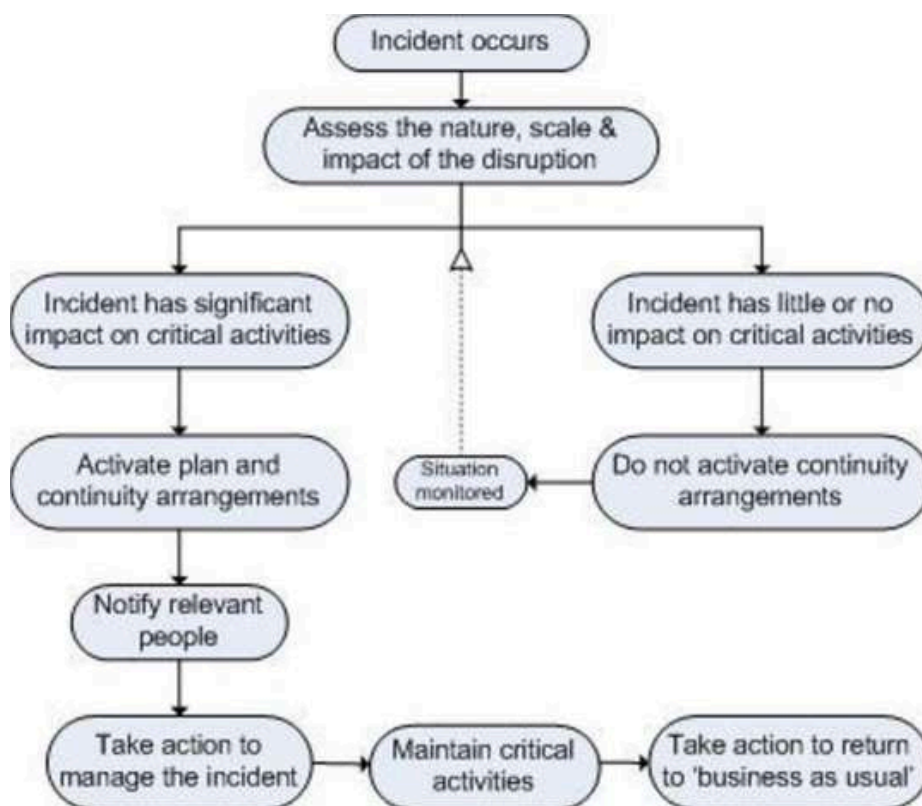
Examples of circumstances triggering activation of this Plan include:

- Loss of key staff or skills e.g. above normal levels of absenteeism due to illness
- Loss of critical systems e.g. ICT failure
- Onset of a global, national, regional or local pandemic impacting employees, suppliers and customers
- Denial of access, or damage to, facilities e.g. loss of a building through fire
- Loss of a key resource e.g. a major supplier vital to the delivery of a key service

## Responsibility for Activation

A member of the nominated Business Contingency Team for the Company will normally activate and stand down this plan. Business as usual should continue as far as possible until it has been confirmed that the plan has been activated.

## Process for Activation



## Incident Management

### Purpose of the Incident Management Phase

- Protect the safety of staff, visitors and the wider community
- Protect vital assets e.g. equipment, data, reputation etc
- Protect customers (learners and employers) where appropriate
- Ensure necessary communication takes place
- Support the Business Contingency phase
- Support the Recovery and Resumption phase

## Actions to Protect the Safety and Welfare of Staff, Visitors and the Public

The following actions will be taken to protect the immediate safety of staff, visitors and the public:

|    | Action   | Teams   |
|----|--|---|
| 01 | Evaluate the building if necessary   | Use normal evacuation procedures for the building   |
| 02 | Ensure all staff report to the Assembly Point.   | The Assembly point for the Egham Office is: car park<br>Office - Centre Managers are responsible for completing this action   |
| 03 | Call emergency services (as appropriate)   | TEL: 999<br>Office - Centre Managers are responsible for completing this action   |
| 04 | Check that all staff, contractors and any visitors have been evacuated from the building and are present. Consider safety of all staff, contractors and visitors as a priority | Office Centre Managers are responsible for completing this action   |
| 05 | Ensure log of incident is started and maintained throughout the incident phase   | Use a decision and action log to do this. The log template can be found as Appendix 1 to this Document  |
| 06 | Ensure log of incident is started and maintained throughout the incident phase   | Managers are responsible for completing this action   |
| 07 | Forward details of any fatalities or injuries (depending on scale of incident) and agree action that will be taken.  | Managers are responsible for completing this action   |
| 08 | Assess impact of the incident to agree response / next steps   | Managers are responsible for completing this action   |
| 09 | Call emergency services (as appropriate)   | Managers are responsible for documenting this information   |
| 10 | Consider whether the involvement of other teams, services or organisations are required to support the management of the incident  | Depending on the incident the following assistance may be approached to assist with incident management: <ul style="list-style-type: none"> <li>• Personnel</li> <li>• Health and Safety</li> <li>• Legal</li> <li>• Occupational Health</li> </ul> |

## Communication Actions

In the event of an incident and this plan being activated, the following groups of individuals should be contacted. Nature of contact will depend on the incident type and time it has occurred.

Ali Khan (Chief Executive Officer) is responsible for completing the communication actions.

| ALWAYS CONTACTED                |   |  |   |   |
|---------------------------------|---|--|---|---|
|                                 | Group of Individuals  | Communicated by                          | Contact Details   | Likely message  |
| 01                              | BCT   | Ali Khan                                 | Telephone, email, Teams   | Incident is taking place<br>Action is being taken<br>Impact on the service<br>Request to escalate or support  |
| 02                              | Remainder of Management Team  | Ali Khan                                 | Telephone, email, Teams   | Incident is taking place<br>Action is being taken<br>Impact on the service<br>Indication of likely restoration/actions they need to take, including further staff communication     |
| CONTACTED DEPENDING ON INCIDENT |   |  |   |   |
|                                 | Group of Individuals  | Communicated by                          | Contact Details   | Likely message  |
| 01                              | Managers (where affected)   | Senior Management to Direct Reports      | Held by Senior Management, telephone, email, Teams call   | Incident is taking place.<br>Action is being taken.<br>Impact on the service.<br>Indication of likely restoration/ actions they need to take, including further staff communication |
| 02                              | All Staff   | From immediate line manager              | Held by Senior Management   | Incident is taking place.<br>Action is being taken<br>Impact on the service.<br>Where they need to report to/work from  |
| 03                              | IT Service Provider   | Senior Manager in charge of relationship | 01933 426129,<br>0161 6974206,<br>0117 4350143<br>servicedesk@slooptech.co.uk   | Incident is taking place.<br>Action is being taken.<br>Impact on the service.<br>Actions required   |
| 04                              | Landlords/Property Owners   | Senior manager in charge of relationship | Key Contact details   | Incident is taking place.<br>Action is being taken.<br>Impact on the service.<br>Actions required   |
| 05                              | Key Suppliers ie ESFA, Prime Contractors (Colleges) Awarding Bodies, EPAO | Senior manager in charge of relationship | Held by Senior Management (ESFA – Help Centre)<br><a href="https://esfahelp.education.gov.uk/hc/en-gb">https://esfahelp.education.gov.uk/hc/en-gb</a><br>Phone:+44 370 000 2288 | Incident is taking place.<br>Action is being taken.<br>Impact on the service.<br>Actions required.  |

| <b>CONTACTED DEPENDING ON INCIDENT</b> |  |   |  |   |
|--|--|---|--|---|
|  | Group of Individuals   | Communicated by                               | Contact Details  | Likely message  |
| 06                                     | Customers - if on site incident  | Manager on site                               | Consider appropriate methods for communication with customers. Telephone, email and website notices. | Incident is taking place<br>Action is being taken<br>Impact on the service<br>Expected duration of the disruption<br>Alternative arrangements if required |
| 07                                     | Customers – general communication if systems down/HQ office inaccessible | Website Announcement, automatic phone message | Held by Marketing/MIS departments. Telephone, email and website notices.                             | Incident is taking place<br>Action is being taken<br>Impact on the service<br>Expected duration of the disruption<br>Alternative arrangements if required |
| 08                                     | Insurance Company  | Ali Khan                                      | Insurance Company  | Incident is taking place<br>Action is being taken<br>Impact on the service<br>Request for support as available  |

| <b>ACTIONS TO SUPPORT BUSINESS CONTINGENCY</b> |   |   |
|--|---|---|
|  | Action  | Further info/details  |
| 01   | Recover vital assets/equipment to enable delivery of critical activities                                  | The essential equipment/resources/information that need to be recovered where possible include: laptops for remote users; contact devices; bank authorisation devices   |
| 02   | Recover vital systems and data to enable delivery of critical activities and retention of critical record | To ensure that the systems to ensure back-up of relevant business systems, and back-up and restoration of data are effective  |
| 03   | Assess the key priorities for the remainder of the working day and take relevant action                   | Consider sending staff home, to recovery site etc. assess capacity at alternative sites.  |
| 04   | Inform staff what is required of them   | Ensure communication is concise and consistent.<br>How will we support apprentices if you can no longer deliver training<br>How will we ensure ongoing access to apprentices' learning resources and portfolios |
| 05   | Publicise the interim arrangements for delivery of critical activities                                    | How will we support apprentices if you can no longer deliver training<br>How will we ensure ongoing access to apprentices' learning resources and portfolios  |

### ACTIONS TO SUPPORT RECOVERY AND RESUMPTION

|    | Action   | Further info/details   |
|----|--|--|
| 01 | Take any salvage/asset/data recovery actions that are appropriate                    | Remove any equipment, furniture, records etc that are at risk of damage.   |
| 02 | Take actions to ensure contingency of support and provision to learners/apprentices  | How will we support apprentices if you can no longer deliver training<br>How will we ensure ongoing access to apprentices' learning resources and portfolios |
| 03 | Continue to log all expenditure incurred as a result of the incident                 | Use a financial expenditure log to record costs incurred as a result of responding to the incident   |
| 04 | Seek specific advice from your Insurance Company                                     | Act on advice and instructions   |
| 05 | Consult with property providers regarding potential interim alternative arrangements | Keep communications open   |

## Communicating with Staff

Communication to staff should in the first instance be verbally by telephone wherever possible, supported by communication by email in writing, and in Teams which is accessible remotely. Staff contact details are stored in the HR system which is accessible remotely.

Managers are responsible for communicating with their direct reports, who should in turn contact any team members of their own. Managers with large teams may choose to delegate responsibility within those teams but retain overall responsibility for ensuring team members have been contacted.

## Purpose of the Business ContingencyPhase

The purpose of the business contingency phase of response is to ensure that critical activities are resumed as quickly as possible and/or continue to be delivered during the disruption.

The Business Contingency Team is responsible for identifying and maintaining details of critical activities and the resources required to deliver them both in 'business as usual' and in crisis situations. The Business Contingency Team will regularly review the list of critical and non-critical activities to help inform the business contingency response that is required.

## Critical Activities

The following have been identified as critical activities:

| Brief Description of Critical Activities |   |
|--|---|
| 01                                       | Training delivery continuation and access to learning resources and systems |
| 02                                       | Functioning website to support communications                               |
| 03                                       | Telephone system for staff to communicate with customers                    |
| 04                                       | Ability to access banking systems to make and receive payments as required  |
| 05                                       | Teams access to enable communication  |

## Non-Critical Activities

A number of activities are non-critical, and consideration will be given to:

- Not recovering these activities until critical activities have been resumed
- Suspending these activities and diverting their resources to support the critical ones

The non-critical activities for the company are:

| <b>Brief Description of Non-Critical Activities</b> |  |
|---|--|
| 01  | Access to all other business and learning systems          |
| 02  | Physical Property access (assuming remote access possible) |

## Business Contingency Actions

The Business Contingency Team for the incident is responsible for ensuring the following actions are completed:

| ACTIONS TO SUPPORT RECOVERY AND RESUMPTION |  |  |
|--|--|--|
|  | Action   | Further info/details   |
| 01   | Identify any other staff required to be involved in the BCT response                     | Depending on the incident, the Business Contingency Team may need additional/specific input in order to drive the recovery of critical activities  |
| 02   | Evaluate the impact of the incident  | Use an incident impact assessment form to understand the impact of the incident on 'business as usual' working activities.   |
| 03   | Plan how critical activities will be maintained.   | Consider:<br>Immediate priorities<br>• Communication strategies<br>• Deployment of resources<br>• Finance<br>• Monitoring the situation<br>• Reporting<br>• Business Partner Responses       |
| 04   | Log all decisions and actions, including what you decide not to do and include rationale | Use a decision and action log to do this   |
| 05   | Log all financial expenditure incurred   | Use a financial expenditure log to do this. Finance department to allocate code for incident to enable maintenance of all related expenditure against cost code                              |
| 06   | Allocate specific roles as necessary   | Roles allocated will depend on the incident and availability of staff  |
| 07   | Secure resources to enable critical activities to continue/be recovered                  | Consider requirements such as the staffing, premises, equipment  |
| 08   | Deliver appropriate communication actions as required                                    | Ensure methods of communication and key messages are developed as appropriate to the needs of your key stakeholders e.g. customers, suppliers, staff, ESFA, Prime Contractors and Regulators |

## Purpose of the Recovery and Resumption Phase

The purpose of the recovery and resumption phase is to resume normal working practises for the Company. Where the impact of the incident is prolonged, normal operations may need to be delivered under new circumstances e.g. from a different building.


| RECOVERY AND RESUMPTION ACTIONS |  |  |
|---------------------------------|--|--|
|                                 | Action   | Further info/details   |
| 01                              | Agree and plan the actions required to enable recovery and resumption of normal working practises  | Agreed actions will be detailed in an action plan and set against timescales with responsibility for completion clearly indicated.   |
| 02                              | Continue to log all expenditure incurred as a result of the incident   | Use a financial expenditure log to do this   |
| 03                              | Respond to any long terms support needs of staf  | Depending on the nature of the incident, the Business Contingency Team may need to consider the use of Counselling Services e.g. internal Occupational Health involvement or appropriate External Agencies     |
| 04                              | Carry out a 'debrief' of the incident and complete an Incident Report to document opportunities for improvement and any lessons identified | Use an Incident Report Form to do this. This should be reviewed by all members of the Business Contingency Team to ensure key actions resulting from the incident are implemented within designated timescales |
| 05                              | Review this Contingency Plan in light of lessons learned from incident and the response to it  | Implement recommendations for improvement and update this Plan. Ensure a revised version of the Plan is read by all members of the Business Contingency Team   |
| 06                              | Publicise that there is now 'business as usual'  | Publish on Teams and via individual office/team meetings as appropriate  |

## APPENDIX 1: PLAN IMPLEMENTATION CONTROL LOG

| Action  | Activity Type (Test/Incident) | Scenario Tested                                    | Staff Involved                     | Summary of Test Success   | Improvements Required   |
|---------|-------------------------------|--|------------------------------------|---|---|
| Example | Test                          | Head Office inaccessible – staff to work from home | 4 x Sales<br>1 x CX<br>1 x Finance | Well executed, no major issues reported, all able to work with minimal disruption | Quicker response/availability of solutions of training centre |

## REVIEW

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Chief Operating Officer (COO).

| Adoption Date | Updated | Review Date | COO   |
|---------------|---------|-------------|---|
| 10/2018       | 24/7/25 | 01/7/26     |  |