

ELA TRAINING SERVICES

Business Continuity Planning Policy



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Purpose

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 Continuity Planning 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 Continuity Planning Programme 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 require the commitment of each employee, associates, departments and suppliers to support the objectives required to protect the company assets, mission, values and survivability.

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.

Policy

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 Continuity 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 Continuity Planning team and appropriate internal representatives and external organisations.

Each division is responsible for communicating its current and comprehensive Business Continuity 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 Continuity Plan should include; appropriate procedures, staffing arrangements, tools and workplace planning requirements necessary to meet approved deliverable requirements.

The Business Continuity Plan

The board of directors and senior leadership team shall develop the Business Continuity 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 board of directors and senior leadership team, and the senior 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 Continuity Centre (BCC) at the company's main offices if required.

ELA's senior leadership team consists of a Director of Delivery Operations and Quality, Director of MIS, Admin and Compliance, Head of People and Culture, Head of Delivery Operations and Head of Employer Engagement.



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 Continuity 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 Continuity training for the Crisis Management Team, directors, management team and staff is essential for effective resumption and recovery of operations.

The 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, directors, management team and staff must be trained about their business resumption and recovery roles in coordination with the Business Continuity Plan.

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



Business Continuity Planning Procedure

Plan Review

This Plan will be formally reviewed annually.

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 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:

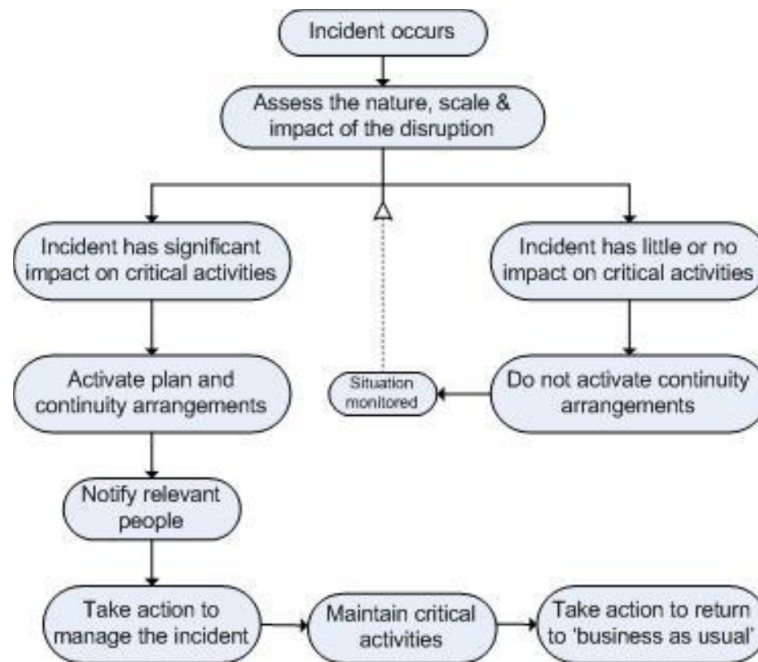
- Loss of key staff or skills e.g. above normal levels of absenteeism due to illness
- Loss of critical systems e.g. ICT failure
- Onset of a global, national, regional or local pandemic impacting employees, suppliers and customers
- Denial of access, or damage to, facilities e.g. loss of a building 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 Continuity 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 Continuity phase
- Support the Recovery and Resumption phase



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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:

	Teaching Qualifications	Teams
01	Evacuate 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 London Office is: car park The Assembly Point for the training centre is: car park Office Centre Managers are responsible for completing this action
03	Call emergency services (as appropriate)	TEL: 999 Office 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	Record names and details of any staff, contractors or visitors who may have been injured or distressed in the incident	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"> • Personnel • Health and Safety • Legal • Occupational Health

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 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 Action is being taken Impact on the service Request to escalate or support
02	Remainder of Management Team	Ali Khan	Telephone, Email, Teams	Incident is taking place Action is being taken Impact on the service 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	Incident is taking place. Action is being taken. Impact on the service. 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. Action is being taken. Impact on the service. Where they need to report to/work from
03	IT Service Provider	Senior Manager in charge of relationship	01933 426129, 0161 6974206, 0117 4350143 info@newgen-it.co.uk	Incident is taking place. Action is being taken. Impact on the service. Actions required.
03	Landlords/ Property Owners	Senior Manager in charge of relationship	Key Contact details	Incident is taking place. Action is being taken. Impact on the service. Actions required.
04	Key Suppliers i.e. ESFA, Prime Contractors (Colleges), Awarding Bodies/EPAO	Senior Manager in charge of relationship	Held by Senior Management (ESFA – Help Centre https://esfahelp.education.gov.uk/hc/en-gb) Phone: +44 370 000 2288	Incident is taking place. Action is being taken. Impact on the service. Actions required.
05	Customers – if on site incident	Manager on site	Consider appropriate methods for communication with customers. Telephone, email and website notices.	Incident is taking place Action is being taken Impact on the service Expected duration of the disruption Alternative arrangements if required



06	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 Action is being taken Impact on the service Expected duration of the disruption Alternative arrangement if required
07	Insurance Company	Ali Khan	Insurance Company	Incident is taking place Action is being taken Impact on the service Request for support as available

Actions to Support Business Continuity		
	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 records	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. How will we support apprentices if you can no longer deliver training 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 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 continuity of support and provision to learners/apprentices	How will we support apprentices if you can no longer deliver training 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
	Seek specific advice from your Insurance Company	Act on advice and instructions
04	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.

BUSINESS CONTINUITY

Purpose of the Business Continuity Phase

The purpose of the business continuity 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 Continuity 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 Continuity Team will regularly review the list of critical and non-critical activities to help inform the business continuity response that is required.



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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:

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



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Business Continuity Actions

The Business Continuity 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 Continuity 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: Immediate priorities <ul style="list-style-type: none"> • Communication strategies • Deployment of resources • Finance • Monitoring the situation • Reporting • 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
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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 staff	Depending on the nature of the incident, the Business Continuity 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 Continuity Team to ensure key actions resulting from the incident are implemented within designated timescales
05	Review this Continuity 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 Continuity 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

Actioc	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, 1 x CS 1 x Finance	Well executed, no major issues reported, all able to work with minimum disruption	Quicker response/ availability of solutions of training center

Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Director of Operations.

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	