MAJOR INCIDENT AND BUSINESS CONTINUITY POLICY

Policy Group: Health and Safety

Effective: 1st Jan 2022

Approved: Brenda Mcleish, CEO

Responsible officer: Mark Fletcher, Head of Health and Safety

Next renew due: Jan 2023

Ref no.: 2.4

GUIDANCE

Vision

Transform lives through learning

Values

P PASSIONATE - We're passionate about everything we do, especially creating as many opportunities as we can for both young people and adults to gain new skills.

U UNSTOPPABLE - We are committed to continually exploring ways to improve the service that we offer for the benefit of our learners, partners, and employers.

R RIGHT - We endeavour to be open, honest and fair in our dealings with learners, employers, partners and stakeholders. We also aim to get it right first time.

P PARTNERSHIPS - We continually strive to deliver excellence through strategic and sustainable partnerships with a wide range of FE organisations, employers and wider stakeholders.

L LEARNERS - We keep our learners at the centre of everything we do and we are driven by the desire to provide life-changing opportunities for them.

E EMPOWERMENT - We are passionate about supporting Purple People at all levels, empowering them to realise their full potential and progress.

Tone of voice

Our tone of voice takes its direct influence from our core values. We are passionate about people and learners and are driven to get the best out of everyone by understanding them. We are caring and supportive, as well as being determined and striving for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.
Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

SUMMARY CHANGES

Date	Page	Details of amendments
Jan 2022	Whole document	Annual Review

I. INTRODUCTION

Learning Curve Group (LCG) is one of the largest national training providers in the UK, providing education and training nationally. All companies within the LCG family uphold the same company vision, mission and core values and follow our group policies and procedures.

This policy sets out the means to provide a flexible response framework so that Learning Curve Group 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 procedures that may apply.

Reason for policy:

This policy 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 manifest itself in terms of delivery of education, safety/welfare of colleagues and learners, 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
- To return business as normal as soon as possible after the incident and limit the impact on our customers and learners

II. 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	1 hour
Safeguarding and Prevent services	1 hour
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
Call Centre	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 Executive Team.

Escalating a serious incident
All serious incidents should be reported to the relevant Executive 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 site's, the ERT meeting should be held at one of the other company sites nominated by the Chief Executive Officer. 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 CEO as detailed in Appendix 1 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 2 of this policy gives an overview of how this plan can be activated.

Military Academies
Within our Military Academies we follow the strict practices of the Ministry of Defense (MOD) whilst using their sites and the incident officer would liaise with the MOD, should there be any critical incidents. The military works on what we call an 'alert state for the whole of the UK (the threat level from Northern Ireland will remain separate). The levels are:
- Critical – an attack is highly likely in the future
- Severe – an attack is highly likely
- Substantial – an attack is likely
- Moderate – an attack is possible but not likely
- Low – an attack is highly unlikely

Each of our military academies have an alert board where the alert state is highlighted, usually located in the foyer. Academy managers pay attention to the alert state and if there are any changes or if specific intelligence comes in, guidance is sought from the MOD. The RFCA would support LCG in the re-locating of our learners to a temporary venue, should it be necessary.

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 Chief Executive Officer, or their nominated deputy, will trigger the emergency response team to undertake their responsibilities (see roles and responsibilities section in Appendix 1). 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 LCG 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 updated by

the Director of People and the Director of Funding and MIS. The file should be taken out of the LCG 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, Estates and Environment.

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

This has been reviewed and approved by our CEO, Brenda McLeish:
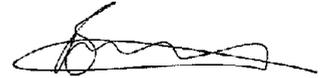
III. DEFINITIONS

Term	Explanation
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.

IV.   RELATED POLICIES

2.1 Health and Safety Policy
2.10 Safeguarding and Prevent Policy

Appendix 1

1. Business Recovery

Immediate Actions
Under the direction of the CEO, CFO 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 LCG 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 LCG 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 LCG 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.

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: Chief Executive Officer - 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 LCG Board
- Allocate resources
- Be prepared to answer questions from the media

Curriculum Delivery: Chief Operating Officer – responsible for management of the incident from a business perspective while ensuring the rest of the business operates as normal.
- 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: Director of Marketing and Communications – responsibility for informing any employers who may be affected by the incident and how it may affect their learners.
- 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: Director of Performance and Development – responsibility for onsite management of any incident, being the main liaison between the CEO/ERT and the scene of the disruption
- 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: Director of Marketing and Communications – responsibility for all external communications/announcements and any internal communication to staff on an ongoing basis.
- 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 Chief Operating Officer

Welfare Officer: Centre 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.
- 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, Estates and Environment – responsibility for managing the building alongside the Centre Manager once the emergency services have completed their initial activities and the area is safe
- 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/neighboring buildings where required
- Alongside the Chief Operating Officer manager any transfer to alternative premises and arrange for them to be operational within agreed timescales including furniture and equipment

HR Officer: Director of People – responsibility for ensuring staff welfare during any event including contact with immediate family members where required

- 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: Group Finance Controller – responsibility for managing costs associated with any event.
- 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, labor 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: Business Systems Director
- Organise the retrieval and restoration of data
- Prioritise access to systems to ensure minimum disruptions to the operation of the business

1. Plan Activation Process

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

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                        ┌─────────────────┐
                        │ Incident Occurs │
                        └────────┬────────┘
                                 │
                                 ▼
                        ┌─────────────────┐
                        │ CEO or Deputy   │
                        │ alerted         │
                        └────────┬────────┘
                                 │
                                 ▼
        ┌────────────────────────────────────────────────────┐
        │ Provisionally assess business severity and         │
        │ business impact based on information from Centre    │
        │ Manager and Emergency Services at scene             │
        └────────────────────────┬───────────────────────────┘
                                 │
                                 ▼
                        ┌─────────────────┐
                        │ BUSINESS IMPACT?│
                        └────┬───────┬────┘
           Major            /         \          Minor
                           ▼           ▼
        ┌──────────────────────┐   ┌──────────────────────┐
        │ Activate the         │◄--│ Ongoing Monitor and  │
        │ Emergency Response   │   │ assessment           │
        │ Team                 │   └──────────┬───────────┘
        └──────────┬───────────┘              │
                   ▼                          │
        ┌──────────────────────┐              │
        │ Manage the Incident  │              │
        │ based on roles and   │              │
        │ responsibilities     │              │
        └──────────┬───────────┘              │
                   ▼                          │
        ┌──────────────────────┐              │
        │ Ensure ongoing       │              │
        │ business continuity  │              │
        └──────────┬───────────┘              │
                   ▼                          ▼
        ┌──────────────────────┐   ┌──────────────────────┐
        │ Implement recovery   │──►│ End /Plan De-        │
        │ and resumption phase │   │ activated            │
        └──────────────────────┘   └──────────────────────┘
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