

Business Continuity Plan

Introduction

The purpose of the Business Continuity Plan is to ensure that the School has robust measures in place to cope with a major disruption to its activities and services. A coordinated and planned approach will help the School to sustain critical activities at an acceptable level and to return operations to normal as quickly as possible, to safeguard students, staff, partners and other stakeholders, to protect School assets, and to safeguard the School's reputation.

The types of Major Incident that could take place, though unlikely, are: major incidents affecting the campus (e.g., fire, flood, utility failure); incidents affecting people (e.g., fire, major security threat, pandemic); and incidents affecting communications (e.g., IT failure, telephone failure, data loss). This Plan provides guidance on incidents affecting the campus or the School's people; the School's IT Incident Recovery Plan provides specific guidance on incidents affecting the School's information, communications and data systems.

This Business Continuity Plan provides strategic level guidance for senior managers in the event of a major disruption affecting the campus or the School's people, including tasks, roles and responsibilities.

The [Student Protection Plan](#) sets out what the School would do to protect its students in the unlikely event that the School is forced to close permanently.

Determining Critical Activities

As part of the School's business continuity planning, the Registrar is responsible, in collaboration with Heads of Departments, for developing and maintaining a School Impact Analysis (SIA). This SIA identifies the critical School functions and states the impact of the loss associated with this. The SIA:

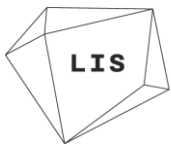
- Identifies critical School activities;
- Identifies key internal and external dependencies of these activities (e.g., suppliers);
- Assesses how long the School can continue without the activity in the event of disruption; and
- Identifies the impact on the School (financial/operational/reputational).

The SIA does not specify the nature of the incident but focuses on the impact of critical activities not occurring. In the event of any Major Incident, the SIA is used to prioritise the resumption of activities and services.

The Registrar will review the SIA with the Executive Committee on at least an annual basis, or more frequently where the Registrar determines that the SIA has changed materially. The Executive Committee must approve the SIA at any review session, making amendments as it sees fit.

The School Impact Assessment is developed and reviewed using the template below:

School Impact Assessment Template:



Critical Activity	Dependencies	Immediate impact if activity cannot occur	Level of impact	Recovery time	Owner
<i>E.g., Teaching</i>	<i>E.g., what IT system, which suppliers support this activity</i>	<i>Financial/operational, reputational impact</i>	<i>High, medium or low</i>	<i>How long could the School manage with no activity? What is a maximum tolerable period with minimum activity? What is the maximum tolerable period to achieve normal activity?</i>	<i>School owner of critical activity</i>

Business Continuity Plan

When the Business Continuity Plan is used

The Business Continuity Plan is used in the event of incident affecting the School site or the School's people that leads to a loss of critical function and prevents the School from operating effectively. The IT Incident Recovery Plan is used in the event of the loss of any critical information, communication or data system. The [Student Protection Plan](#) is used in the event that the School is forced to permanently close.

Incident classification

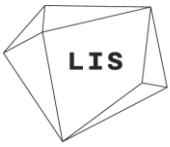
A Major Incident for the purposes of this Plan is any event impacting School sites or people that significantly disrupts critical activities, affecting the entire School. *Examples include: a major security incident; an event or incident causing major damage to property or human welfare; loss of a major supplier, leading to significant impact on service delivery, where a new supplier is difficult to source; major damage to building(s), leading to significant evacuation and longer-term relocation of occupants and services.*

A Moderate Incident is any event impacting School sites or people that partially disrupts critical activities, affecting a subset of members of the School. *Examples include: significant loss of assets or staff that has a significant but short-term impact on service delivery; moderate damage to buildings, with limited evacuation and short-term relocation required.*

A Localised Incident is any event impacting a local area of a School site or a small group of School members that does not meaningfully disrupt critical activities. *Examples include: a minor threat contained onsite with no adverse public impact; limited loss of assets or staff with limited impact on service delivery; loss of a supplier, where a new supplier can be easily and quickly sourced; minor structural or cosmetic damage to buildings, with no evacuation or relocation of people or services required.*

Critical activities

The School Impact Analysis defines the School's critical activities as follows:



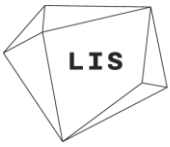
- *Academic Delivery*, which is one of the fundamental requirements of the School. The level of impact to academic delivery by a Major Incident will depend upon what time of the academic year the incident occurs, and the extent to which teaching alternatives (e.g., remote learning) could be used.
- *Assessment and Examination*, which are fundamental to the continuation and progression of students and the timely delivery of qualifications. Assessments and Examinations are only at risk of being affected by a Major Incident at certain points in the academic year. Wherever possible, the School will endeavour to support these processes during a Major Incident and ensure that continuity and integrity are maintained.
- *Admissions*, which is also a crucial activity for the School, and again the critical admissions processes are undertaken during a specific portion of the academic year. The School is committed to providing support to these processes at the critical times to ensure their continuation in the event of a Major Incident.
- *Student Experience*, which is student welfare, wellbeing and support. The School is committed to ensuring that the safety of students, as well as the wider community, is at the forefront of its planning in a crisis.
- *Staff Welfare*: the School commits to preserving staff safety and welfare in the event of a Major Incident, and not to expose staff to unreasonable risks in the course of their duties. Certain central and support activities are essential to the operation of the School, such as IT, Finance, and Facilities & Estates (and, at certain times of the year, Registry), and these areas will be required to have plans and support structures to enable them to deliver their activities as far as is possible during a Major Incident.
- *Marketing and Recruitment*, which supports the admissions process, but which is often focused on future intakes of students. The School may therefore take a view that these activities could be suspended if necessary in the case of a Major Incident.

Response to Incidents

The School's response to incidents will depend upon the impact of the incident on the critical functions of the School (i.e., Major Incident/ Incident/ Localised Incident).

In the event of a Major Incident, (the Executive Committee) will convene within 60-120 minutes (depending on whether the incident takes place in working hours) to direct and support the resolution of the incident and the restoration of activities. This is equivalent to Gold Command in crisis management terminology.

In the event of a Moderate Incident, the Executive Committee may determine, or be requested to intervene to direct and support the relevant department heads in resolving the incident and restoring activities. However, in general the Moderate Incident will be managed by the head of the critical area(s) affected. This is equivalent to Silver Command in crisis management terminology.



In the event of a Localised Incident, the Executive Committee will not convene, but the incident will be handled by the relevant staff at the local level. This is equivalent to Bronze Command in crisis management technology.

Executive Committee and Major Incident Management

The Executive Committee is responsible for implementing a response to a Major Incident in line with the Business Continuity Plan in the event of all Major Incidents, as well as in the event of Moderate Incidents where either a head of critical area has referred the incident to the Committee, or the Chief Executive has determined that the Team must have oversight of the management of the incident.

The roles of the members of the Executive Committee in the event of a Major Incident are:

The Chief Executive, whose role is to: provide overall strategic guidance and decision-making within the Team, with regard to handling the Major Incident and restoring business continuity; represent the School in any media communications that arise; consider any requirements to notify external regulators of any major incident affecting the School; validate any changes to the composition of the Team during the handling of a Major Incident.

The Executive Chair, whose role is to act as the deputy and chief of staff to the Chief Executive; and also to execute any coordinating functions required across School departmental leads in managing the incident. The Executive Chair is also responsible for working in conjunction with the Teaching and Learning Director to monitor events and assess potential impact and consequences; to be the single point of contact for, and maintain liaison with, Local Authority emergency response representatives; and direct any recovery processes required. The Executive Chair is supported in these activities by the **Chief Product Officer**.

The Teaching and Learning Director, whose role is to: determine the extent and potential consequences of the major incident in terms of core service delivery (teaching and learning); and direct any recovery processes required.

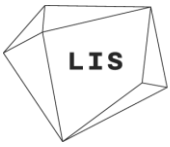
The Director of Student Experience, Careers and Partnerships, whose role is to: ensure students receive appropriate welfare and support throughout the response and recovery phases, facilitating transport and accommodation as required.

The Director of Finance and Human Resources, whose role is to ensure that all staff and visitors receive welfare and support throughout the response and recovery phases, facilitating transport and accommodation as required.

The Head of Marketing, whose role is to: manage communications internally and external during response and recovery of the Major Incident, including any handling of the media.

The Registrar, whose role is to manage any relevant communications with regulators.

Each of these members will have a nominated deputy in the event that they are away during a Major Incident, or a Moderate Incident that requires guidance and support from the Major Incident Management Team. The Chief Executive may at any time change the composition of the Team where necessary and appropriate.



The collective role of the Major Incident Management Team in the event of a Major Incident or escalated Moderate Incident is as follows:

- Communicate with key stakeholders;
- Provide management control and strategic direction, focusing on restoring critical School activities, and, where multiple critical activities are affected, prioritizing activities, using the School Impact Assessment;
- Determine whether to implement resolution and recovery plans proposed by Heads of critical activities, and any other actions;
- Determine contingency plans to continue activity at reduced level where possible, including planning and execution of any relocation to alternative sites where appropriate;
- Secure emergency resources as required;
- Communicate with media as required;
- Approve damage assessment and negotiate with insurers;

The role of heads of critical activity areas (e.g., Teaching and Learning Director, Director of Student Experience, Head of Marketing) in the event of a Moderate Incident is as follows:

- Escalate the incident, if necessary, to Major Impact and pass control to the Major Incident Management Team; or forward request for assistance and direction from the Major Incident Management Team to oversee the management of the Moderate Incident;
- Communicate with key stakeholders;
- Provide management control and tactical direction within area of activity;
- Determine whether to implement resolution plans proposed by operational staff, or any other actions;
- Determine contingency plans to continue activity at reduced level where possible;
- Secure financial and human resources as required;
- Approve damage assessment and negotiate with insurers.

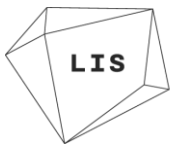
Incident Management Process

Where a Localised Incident occurs, it will be dealt with by local operational staff, without the need to escalate it to a higher level of control.

Where a Moderate Incident occurs, staff will report it to their Head of Department, as well as any other relevant Head of Department (i.e., the head of the critical activity or activities affected). Heads of critical activities will liaise with each other immediately where there is more than one critical activity disrupted. The affected head(s) of critical activities that have been disrupted shall determine whether to: escalate the incident to a Major Incident for management by the Executive Committee; *or* continue to classify the incident as Moderate, but refer to the Executive Committee for oversight; *or* to manage the Moderate Incident at their level.

The head of a critical activity that has been disrupted may at any time escalate an incident from Localised to Moderate, or Moderate to Major, and may also de-escalate an incident from Moderate to Localised.

Where a Major Incident occurs, staff will report it to the Chief Executive, or if they are unsure if it is Major, to their Head of Department, who will then determine whether to refer it to the Chief Executive as a Major Incident. In the event of a Major Incident being identified, the Chief Executive will convene the Executive



Committee, within 60 minutes in normal working hours, or within 120 minutes outside normal working hours. Where a member of the Executive Committee is unable to meet within these timeframes, they will send their designated nominee in their place.

The Chief Executive may at any time decide to escalate any incident (e.g., from Localised to Moderate, or Moderate to Major), or to de-escalate any incident.

The process for managing an incident, no matter how severe, is broadly as follows:

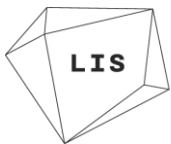
Stage	Actions
<i>1: Emergency Response</i>	Impact assessed and plan of action determined, including level at which the incident should be managed. In this case of a Major Incident, this is when the Executive Committee is convened. Local authority emergency responders are called if required, buildings are evacuated if required, and any necessary communications are made to students and staff (and potentially the media).
<i>2: Recovery Process</i>	Once the incident is under control and all steps have been taken to remove people from harm and secure assets, continuity actions are conducted to restart essential operations. This may include clean-up, restoration of critical activities, the establishment of post-incident counselling services, initiating recovery processes from insurers, and the dissemination of reassuring communications to students and staff (and potentially the media).
<i>3: Restoration of Service</i>	Conditions restored to normal.
<i>4: Review</i>	Incident is reviewed to identify actions, changes or investments required to reduce risk of recurrence. Risk log is reviewed and updated.

Training

The Executive Committee will receive annual training in the Business Continuity Plan. This training will be a classroom, scenario-based exercise, led by an external consultant, which will expose managers to a likely crisis and, as the incident unfolds, enable them to consider the impact on the School's critical functions. Heads of Department will be responsible for ensuring that their teams are aware of the process of escalating incidents and that their teams receive targeted training to enable them to address Moderate and Localised Incidents that may affect their area of activity.

Monitoring and Review

This Plan will be reviewed annually by the Registrar and any changes authorised by the Executive Committee. If any significant business change occurs, the relevant section(s) of the plan will be updated at the earliest opportunity.



Version control

Name of policy/procedure:	Business Continuity Plan
Document owner:	Hannah Kohler, Director of Admissions and Student Support
Date Originally Created:	01/2019
Related documents: (e.g. associated forms, underpinning processes, related policies or overarching policies)	Risk Management Policy IT Disaster Recovery Plan Student Protection Plan

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of Admissions and Student Support)	13/01/2019	Original draft
2	Jasper Joyce (Director of Finance and Operations)	12/03/2019	Minor wording changes
3	Hannah Kohler (Director of Admissions and Student Support)	20/06/2019	Wording changes
4	Hannah Kohler (Director of Admissions and Student Support)	08/07/2019	Included reference to Student Protection Plan
5	Hannah Kohler (Director of Admissions and Student Support)	10/08/2019	Clarification of accountability for review of Plan and authorisation of changes.
6	Executive Committee	08/08/2019	Approved
7	Hannah Kohler (Director of Strategy and People)	10/2021	Minor changes to job titles; changed Major Incident Management Team to Executive Committee (as essentially the same committee)
8	Head of Quality	Exco Chair's action 02/2/2023	Change of role titles inc from Director of New Products to Chief Product Officer, Director of Strategy and People to Director of Finance and HR.