



# Business Continuity Policy

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## UNITED COLLEGES GROUP - BUSINESS CONTINUITY POLICY

### Introduction

1. United Colleges Group (UCG) is legally required to undertake Business Continuity Management (BCM) to ensure that in the event of disruption to its services, appropriate measures are in place to provide continuation of its services whilst limiting the potential for further disruption. This process is on-going and is the responsibility of the Chief Executive Officer who is also the Accountable Officer (AO), to ensure that Business Continuity Management is undertaken.
2. BCM directly supports corporate governance and the requirement to produce an annual statement on Internal Control by helping to identify the continuity risks to UCG, providing clear understanding of roles and responsibilities (accountability) and safeguarding of the UCG's assets.
3. This policy provides a framework for establishing and maintaining UCG's capability to minimise the impacts of incidents. The BCM policy will reflect the nature of UCG, its mission, culture and vision and will be subject to an annual review.
4. This policy is built on current good practice and is intended to:
  - Improve BCM resilience within UCG
  - Ensure through the adoption of resilience principles, the continuous operational delivery of UCG services when faced with a range of disruptive challenges such as staff shortages, denial of access and failures in key suppliers
5. This document sets out UCG's policy for Business Continuity Management. UCG's ability to provide services relies on a number of different components. When individual components begin to fail, service delivery and business outcomes may be affected. For BCM to be successful, it must be an integral component of how UCG manages, develops and improves its services. Services may be disrupted by a number of different reasons varying from
  - A shortage of staff possibly due to pandemic flu, severe weather etc.
  - Road fuel shortages
  - Rail transport strikes
  - Denial of access to UCG building/ premises due to flooding, fire, bomb threat and terrorist attacks
  - Loss of IT / cyber-attacks and
  - Loss of utilities such as water and electricity
6. Regardless of the disruption, the community served by UCG will still require services. It is essential that the UCG has mechanisms in place to ensure continue delivery of service occurs during such disruptions. UCG also recognises the potential operational and financial losses associated with a major service interruption, and the importance of maintaining viable recovery strategies.
7. During a disruption, it may not be possible for the UCG to continue delivering all of its services in the usual way. All UCG services are important, however, during an incident, services will be maintained based on their criticality and priority to the UCG community.

Plans will be developed to ensure that resources and facilities are available to ensure critical service delivery at the pre-defined agreed level.

8. The aim of this policy is to establish an appropriate framework to ensure that UCG is able to plan for, prepare and respond to incidents or disruptions to the delivery of its services for the community it serves.

**Objectives:**

- a) To identify those responsible for ensuring Business Continuity for UCG
- b) To identify the key risk areas and ensure appropriate control measures are in place to reduce the severity of an impact on service delivery
- c) To identify response mechanisms and structures to be established to manage the disruption and allocation of tasks to recover UCG services
- d) To provide a guideline on appropriate training and exercising of procedures to be undertaken
- e) To provide assurance to external partners of UCG's commitment to service delivery
- f) To ensure that service providers are able to provide assurance to UCG of their ability to continue to operate during a disruption within their own organisation as well as within UCG.

**Scope**

9. This policy applies to all staff employed by UCG and for whom UCG has a legal responsibility. For those staff covered by a letter of authority/ honorary contract or work experience, the organisation's policies are also applicable whilst undertaking duties for or on behalf of UCG. Further, this policy applies to all third parties and others authorised to undertake work on behalf of UCG. Section 4 of the policy outlines the specific roles and responsibilities of specific UCG staff.
10. This policy does not detail the response to a specific incident; rather, it provides a set-up of activities for establishing a business continuity capability and the on-going management and maintenance, including planning, development, training and exercising of response arrangements.
11. This policy will apply to disruptive events which may impact on UCG's ability to deliver its business objectives. The policy also applies to all UCG campuses.

Business Continuity incidents may be isolated to UCG, however, they may be part of a wider incident affecting the whole of London. Planning assumptions must therefore reflect such scenarios and interdependencies. There is therefore, a need for high level networking with other organisations.

**Processes for Undertaking Business Continuity**

12. Business Continuity is an on-going process. Plans and procedures must be continually reviewed against the changing environment of UCG. By undertaking BC Planning, UCG can expect that:
  - a) Key services are identified, risk assessed and suitable control measures implemented ensuring their continuity
  - b) An incident management capability is enabled to provide an effective response

- c) UCG's understanding of itself and its relationships with its stakeholders is properly developed, documented and understood
- d) Staff are trained to effectively respond to an incident or disruption through appropriate exercising
- e) Stakeholder requirements are understood and able to be delivered
- f) UCG staff receive adequate communication and support in the event of a disruption
- g) UCG's reputation is protected
- h) UCG remains compliant with its legal and regulatory obligations

**Business Continuity Management System (BCMS)**

13. The BCM programme forms the central component which dictates UCG's approach and governance of its business continuity programme. This document serves as that structure and will provide assurances and evidence of continuing work with regards to UCG's commitment to business continuity. Other documentation to be produced to support the BC process shall include:
- (a) Business Impact Analysis (BIA)
  - (b) BC risk assessment
  - (c) Corporate BC Plan to include activation and recovery plans
  - (d) Training and awareness programme
  - (e) Exercise and debrief reports

**Understanding the Organisation**

14. Effective planning and response plans must be underpinned by detailed identification and assessment of the different services that UCG provides. This will be achieved by producing a BIA and risk assessments.
15. The BIA will identify and document the impact of disruption to the activities that support key aspects of UCG's business. The BIA will identify the following:
- a) How the impact will develop overtime during a disruption
  - b) The interdependencies that are required for the delivery of UCG business including staffing, resources and utilities/ infrastructure

Services identified as having a short maximum tolerable period of disruption/ downtime, are those considered to be critical to UCG.

**Developing and implementing BCM Response**

16. UCG will develop a response plan that will detail the arrangements to be followed to ensure continuity of the critical services identified. The scope and potential for disruption to UCG will vary according to the nature of the incident requiring varying level of response. The table below outlines the escalation procedure for dealing with incidents.

Level	Description	Escalation
1	All services are operating normally	None required
2	Disruption for a short period of time	Escalate if situation does not resolve

<b>3</b>	Disruption to most CCG services affecting the ability to provide critical services	Inform Chief Executive Officer and On call director- UCG Internal incident declared. UCG BC Plan invoked.
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The list below provides examples of what might be considered an event to invoke a BCP. The list is not exhaustive and judgement will be applied in each case

- Denial of access to work area- short or long term
- Loss of information technology infrastructure services – short or long term
- Loss of key staff, short and long term
- Significant national or international incident impacting on UCG, such as a pandemic
- Any requirement as identified by the BIA process

### **Accountability and Responsibilities**

17. In order for UCG to develop a good long term business continuity capability, it is essential that all staff take on an appropriate level of responsibility. To that end, UCG has identified a Business Continuity Lead for the organisation- Chief Finance Officer. The Chief Executive Officer (AO) for UCG is ultimately responsible for the ownership of the Business Continuity Management System adopted.

**SLT members** will assess their specific area of expertise and plan actions for any necessary recovery phase, setting out procedures and staffing needs, as well as specifying any equipment or technical resource which may be required in the recovery phase.

**The Business Continuity Lead** will be responsible for:

- Supporting directors to complete their BIAs
- Assisting staff with identifying risks and controls
- Ensuring BC risks are recorded
- Change control, maintenance and testing of the BC Plan.
- Ensuring staff receive appropriate training

**The Accountable Officer** will:

- Determine the criteria for implementing the Business Continuity Plan
- Provide overall management of a crisis, providing strategic direction and coordination of service recovery plans

**SLT Members** and their appointed deputies will:

- Agree to the BIAs developed
- Validate the activities/ services which would have been derived as priority collectively, across UCG
- Be responsible for the implementation of the Business Continuity Policy and standards
- Enforce compliance through assurance activities
- Ensure the BCP plan is kept updated to reflect changes in circumstances and periodically testing the plan

- Review business continuity status and the application of the policy and standards in all business undertakings
- Provide appropriate levels of resource and budget to achieve the required level of business continuity competence and
- Ensure that information governance standards continue to be applied to data and information during an incident.
- be responsible for providing regular reports of BCP to the Audit Committee and/or Corporation

It is intended that the one BC Folder should be stored off site in case there are difficulties in accessing the building. This folder will contain recovery procedures, contacts, and lists of vital materials or instructions on how to get these.

**All other UCG staff** will be responsible for:

- Achieving an adequate level of general awareness regarding Business Continuity
- Being aware of the UCG's BC policy and its procedures
- Being aware of their own directorate contingency plans and any specific roles and responsibilities as set out in the Business Continuity Plan
- Cooperate in the implementation of incident response plans as part of their normal duties, when required to do so
- Participating actively in the business continuity programme when required and
- Ensuring information governance standards continue to be applied to data and information during an incident

#### **Cascade Process**

18. The Chief Executive Officer and SLT make up the Incident Control Team (ICT). The BC ICT will provide immediate management functions required to handle an incident. A cascade structure will be developed in order to cascade incident notification to all staff within UCG.

#### **Risk Analysis**

19. The CCG Business Continuity Lead will work with directorates to develop an asset list of locations, staff and services and this will be identified through the BIA. A series of robust plans and mitigations will be developed for the identified BC risks.

#### **Incident Notification and Analysis**

20. The UCG BC lead will develop procedures for incident notification which will be included in the UCG BC Plan. The response to an emergency does not necessarily or automatically translate into the declaration of a disaster and the implementation of a full recovery operation. Incidents may cause a temporary or partial interruption with limited or no office damage. It will then be the responsibility of the UCG BC lead in conjunction with the Chief Executive Officer and or SLT available, to evaluate and declare the appropriate level of response. The UCG BC lead and UCG Chief Executive Officer/SLT available will decide if temporary premises or alternative long-term premises are eventually to be required and will manage the acquisition. The severity or impact of an incident will be identified as follows:

- Minor
- Moderate
- Major

- Catastrophic

The severity level will indicate the urgency of recovery the business service, and also the order in which services should be re-instated as identified in the BIA.

### **Communication**

21. Communication is crucial during a crisis. Processes of communication will be developed to ensure that there are appropriate statements for internal and external communication and processes for ensuring communication to all staff in the event of a BC incident.
22. The Director of People and Communications will receive information from the Chief Executive Officer and or SLT member, which will be shared with external partners - including the media, other colleges and staff members, providing assurances.

### **Business Continuity Recovery Packs**

23. The BC Lead will develop BC recovery packs which will be located in the incident coordination facility detailing key information and contingencies. Copies will be held by the SLT and Chief Executive Officer. The contents of these packs will be checked for completeness and updated regularly, whenever there is a change in the BCP which may affect its contents.

### **BC Plan Maintenance**

24. The BC Lead will be responsible for ensuring that the BCP is reviewed and updated at regular intervals to determine whether any changes are required to the procedures or responsibilities. A complete and revised BCP will be distributed annually to each BC ICT member.

### **Training and Awareness**

25. Once in place, the UCG Business Continuity lead will ensure that the UCG BCP is available for all staff on the intranet. All staff will receive BC awareness and training as part of induction. Relevant personnel will receive table top and walk through exercises for the BCP. Duty Staff will continue to receive on call training to enable them to manage BC incidents within the organization.

### **Testing**

26. The ongoing viability of the BC program can only be determined through continual tests and improvements. The UCG BC lead will be responsible for ensuring regular tests and revisions are made to the BCP to ensure they provide the level of assurance required. If there are any major changes to the role and structure of UCG, plans will be tested again once a "settling in" period has been achieved, to allow for a confident level of recovery. It is vital as part of ongoing management for UCG to: test the systems, test robustness, exercise plans and rehearse staff.

This policy will be reviewed annually and earlier review may be required in response to exceptional circumstances, organisational change or relevant changes in legislation or guidance.