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Business Continuity Policy

Business Continuity	
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Policy prepared by	Andy Heald – Head of Quality & Education
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Welcome!			Page
Welcome to the <i>TWP Business Continuity Policy</i> . This document is designed specifically to ensure business continuity, protecting the interests of learners as the highest priority.			
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Section One: Purpose

1.1 Context

Train with Premier (TWP) is a National Training Provider. TWP is committed to excellence, offering innovative, industry standard and bespoke training in active leisure learning and wellbeing. TWP has been established in response to an industry demand for an outstanding, niche and robust training provider in these sectors.

TWP is wholly owned by Premier Education Group (PEG) the leading employer and provider of sport, physical activity and performing arts and wellbeing initiatives in England. PEG is the holding company to a number of successful subsidiaries offering awarding and training solutions, organisational improvement services and employment for a large number of physical activity professionals; deploying them into schools and communities. The PEG umbrella has an outstanding reputation and has been pivotal to the professionalisation and economic growth of the sector. TWP is governed autonomously from PEG and its subsidiary companies for conflict mitigation purposes. We are however committed to the PEG core values, ethical position and policy. To ensure that we meet our regulator's expectations we have also deployed a number of policies that meet the needs of our own stakeholders, enabling compliance and driving standards.

Our Mission

To educate and activate through world-leading training solutions in active leisure learning and well-being

1.2 Rationale

We operate with the highest sense of propriety and integrity in the achievement of our mission. In doing so we inspire trust and transparency, complying with all relevant legislation and regulation. The purpose of this approach is to ensure business continuity, protecting the interest of learners as the highest priority.

1.3 Scope

This policy is for internal users driving our process for business continuity where this is needed. Our adherence to this policy serves to protect the interest of learners and must be adhered to by all relevant senior officers and staff. Any allegations of non-compliance should be reported. All allegations will be investigated without bias and corrective action will be taken in which serve to prevent, mitigate or manage any adverse effects.

Section Two: Position Statement

Business continuity commitment	
<p>TWP is committed to excellence operating in accordance with total quality management principles, integrating risk, performance and compliance controls. In doing so the interests of learners are protected as the highest priority. Business continuity encompasses planning and preparation to ensure that an organisation can continue to operate in case of serious incidents or disasters and is able to recover to an operational state within a reasonably short period. Due to the nature of our business our primary target is to ensure that we protect the interest of our learners. As such, business continuity includes three key elements:</p>	
Resilience	Critical business functions and the supporting infrastructure must be designed in such a way that they are materially unaffected by relevant disruptions, for example through the use of redundancy and spare capacity.
Recovery	Arrangements have to be made to recover or restore critical and less critical business functions that fail for some reason. These are confirmed in the contingency operating procedures in this document.
Contingency	The organisation establishes a generalised capability and readiness to cope effectively with whatever major incidents and disasters occur, including those that were not, and perhaps could not have been, foreseen. Contingency preparations constitute a last-resort response if resilience and recovery arrangements should prove inadequate in practice. Detailed contingencies are outlined in the TWP Business Continuity Plan. Contingency operating procedures would apply whilst the plan is implemented.
<p>Typical disasters that business continuity is meant to account for include natural disasters such as fires and floods, accidents by key personnel in the business, server crashes or virus infections, insolvency of key suppliers, negative media campaigns and market upheavals such as stock market crashes. Such disasters may not necessarily have to occur in the place of business to have catastrophic impact in the globalised economy. Risk management is a critical tool that underpins business continuity; providing a structured way to identify the sources of business disruption and assess their probability and harm. Risk management is defined as <i>the effect of uncertainty</i> followed by coordinated and economical application of resources to minimise, monitor, and control the probability or impact of an unfortunate event or to maximise the realisation of opportunities. Risk management serves to assure that uncertainty does not deflect the endeavour from the business goals. TWP therefore engage in detailed scenario planning relevant to the awarding function to identify the risk of the occurrence of an event or incident which could have an adverse effect.</p> <p>These activities have supported the development of a risk register which integrates the current controls and confirms contingencies which are required to be complied with across the operation where the effect of uncertainty or adverse effect is detected. Our business continuity approach and associated business continuity plans are aligned to risks identified within the risk register with the view to ensuring even greater resilience, contingencies and the required recovery measures associated with serious incidents or disasters. On this basis the critical business functions, suppliers, systems and relationships that are critically important to achieve, our organisational and objectives are analysed and included in the business contingency plans. Business Impact Analysis is the generally accepted risk management term for the process of determining the relative importance or criticality of those elements and in turn drives the priorities, planning, preparations and other business continuity management activities.</p>	

Business continuity considerations

Planning, prevention, and preparation are a key part of any business continuity approach. We have a detailed approach which outlines ownership of risks and associated implementation of business continuity plans in case of a serious incident. This policy is designed with the view to understanding the business and to identify potential risks and threats to critical business activities. It also considers the resilience of suppliers plans and serves as a guide for managers and staff when incidents occur. Furthermore, it outlines procedures to follow to assist in a recovery as well as identifying alternative ways to continue business as usual ensuring that we protect the interest of our learners, recognised centres, partners and awarding function.

The entire concept of business continuity is based on the identification of all business functions within an organisation, and then assigning a level of importance to each business function. Business impact analysis is the primary tool for gathering this information and assigning criticality, recovery point objectives, and recovery time objectives, and is therefore part of the basic foundation of business continuity. The BIA has been used to identify extent and timescale of the impact on different levels of the organisation, examining the effect of disruption on operational and strategic activities. Not only the current activities but the effect of disruption on major business changes, introducing new product or services for example, is determined by the BIA. The business impact analysis will therefore be reviewed annually and whenever any of the following occur:

- Significant changes in the internal business environment: processes or technology
- Significant changes in the external business environment: market or regulatory change

Resilience requirement	Description
Security management:	In today's global business environment, security must be the top priority in managing Information Technology. For most organisations, security is mandated by law and conformance to those mandates is investigated regularly in the form of audits. Failure to pass security audits can have financial and management changing impacts upon an organisation.
Document management:	In large information technology environments, personnel turnover is inevitable and must be planned as part of business continuity. The solution to the problems associated with turnover, is complete and up-to- date documentation. This ensures that new personnel will have the information they need to quickly become knowledgeable and productive with respect to the business functions they are tasked to support. This also implies that business function related documentation is largely generated (rather than written) from existing systems and managed in an automated manner.

<p>Audit Management:</p>	<p>One of the most costly and time-consuming aspects of information technology management is dealing with auditors. One of the goals of business continuity is data centre automation, which includes audit management. All modern business functions should be designed with the concept of automatically generating the requisite audit compliance information and documentation as part of conducting day-to-day business. This dramatically reduces the time and cost associated with manually producing this information.</p>
<p>Change management:</p>	<p>Regulations require that changes to business functions be documented and tracked for auditing purposes and is designated as "change control". This brings a level of stability to the business functions by requiring the support personnel to document and coordinate proposed changes to the underlying systems. As this process becomes more and more automated, the emphasis will be less upon personnel control, and more upon regulatory compliance.</p>
<p>The TWP Business Continuity plan considers these implications and is documented with the view to signposting staff to the associated processes. These must be followed to prevent or to control the outcomes in the event of an accident, disaster, emergency, or threats without any stoppage or hindrance to key operations which can be caused by factors beyond our control. Following implementation of these actions will enable us to restore services in the minimum time frame. The arrangements in the plans will therefore become effective when an incident occurs and remain in effect until operations resume as normal to ensure we protect the interest of our learners.</p>	

Section Three: Procedures

3.1 Business Impact Analysis

Standard operating procedures				
People	Premises	Processes	Providers	Profile
Key Staff:	Buildings:	IT Applications	Service Provider to:	Reputation/Financial:
Managing Director Head of Education & Quality Head of Commercial Sales Operations & Compliance Manager Senior Programme Coordinator Tutors Assessors Internal Quality Assurer	Registered office: The Old Apple Store, Church Road, Shropham, Norfolk, England, NR17 1JE. Team operate remotely and from the office.	Windows, Outlook and MS Office applications Internet connectivity	Learners (HIGHEST PRIORITY) Recognised centres Partners Employers Industry representatives	Inability to deliver training which would impact on industry reputation and financial resources
Expertise:	Facilities:	Documentation:	Standards and regulators bodies:	Legal Considerations:
MD: Expert in leadership, strategic management, regulation and all aspects of the operation QD: Expert in all aspects of the product development and deliver SPC: Expert in product coordination TAA: Skilled in customer service Workforce: expert in product delivery, assessment and quality assurance	Office (desks and chairs), kitchen and appliances, showers, toilets, meeting rooms, car park	Electronic: Strategic management plans Policies, processes procedures Specifications Assessment Briefs Assessment Tasks Assessment Marketing and Moderation Guidance Stakeholder contact details for communication purposes Hard Copy: Evidence received via post associated with investigations and access requests	Ofqual CIMSPA Skills for Health Skills Active	Legislation and policy Ofqual regulatory requirements Ofsted regulatory requirements EFSA regulatory requirements Legal agreements: <ul style="list-style-type: none"> • Suppliers • partners • AOs
Minimum Staffing Levels:	Technical Equipment:	IT Systems and Processes:	Suppliers:	Communications:
One member of the service team in the office at all times. One AO Senior Officer on call at all times whether remotely or in the office. Outsourced corporate service providers in the office at all times [HR/IT/PR/F+A]	Laptops, iPhone Secure land telephone line	TWP Website	Website via PEG Corporate services via PEG	TWP Governing Body Regulators/AOs/Suppliers/Partners Standards Bodies [CIMSPA] Service level workforce Sites/Learners

Contingency operating procedures				
People	Premises	Processes	Providers	Profile
Key Staff:	Buildings:	IT:	Service Provider to:	Reputation/Financial:
HR policy is in place to drive recruitment in the event of loss of key staff. Cross training in place to enable continuity due to periods of staff absence.	Operational activities and meetings are eligible to be conducted remotely due to cloud-based system functionality. This can be done anywhere in the world if needed.	Laptops are available to all staff. Internet access is required remotely. Website information is all available in excellence, electronic word and hard copy versions. Web-based forms are available to all stakeholders in excel in electronic excel, word and hard copy versions These can be used in the short term to support learners. In all such cases the reports downloaded for business continuity would be checked just as if the no disruption has occurred. The same checks can be completed from the reports to ensure compliance is maintained.	Learners to be managed via electronic word forms. Centres to be managed via electronic word forms. Normal checks to be conducted to ensure service level and compliance levels maintained.	Services will continue through remote working or by cross trained staff.
Expertise:	Facilities:	Documentation:	Standards and regulators bodies:	Legal Considerations:
All staff undertake monthly cross training and an expertise mapping exercise will be undertaken when the full complement of staff is recruited. The HAO will have trained in the responsible officer roles. EQAs are highly competent across the industry and can be used to cover different geographical areas without conflict. All staff are provided with a recovery pack	Facilities can be replicated when working from home. Access to e-mails is continuously available from home and where this is unavailable the emergency email is initiated. Remote working is acceptable; iPhone provided in emergencies to the QAO.	Documentation is contained in TAMS and in the cloud folder system. Posted evidence is scanned and uploaded via the two systems	Data is prioritised and downloaded from systems and saved in the cloud document system should this be required from the auditors. Document are saved in the cloud should the SSBs require this.	Service levels will be maintained with minimum interruption unless the risk is transferred to Creatio as the key supplier. In this instance their business continuity arrangements will apply, and electronic and papers-based systems initiated. Similarly, key risks are transferred to TQUK as the certificate print and dispatch supplier in accordance with the SLA.
Minimum Staffing Levels:	Equipment/Resources:	Systems and Processes:	Suppliers:	Communications:
A minimum of a single senior officer and one staff member available at all times. Info available securely off site.	Managers have allocated iPhone and are available to be contacted at any time. In the event that phones are ever switched off - messages are picked up every couple of hours - even during holiday periods. These numbers are communicated to relevant stakeholders in the event that the landline is unavailable.	System reports are continuously downloaded and maintained on the document cloud system. All forms and requests are contained in word based electronic files and can be used electronically.	PEG have rigorous business continuity arrangements in place. .	The landline is set to redirect to the landline. iPhone are allocated and emails can be done direct from the iPhone. TAMS is available via the iPhone. Emergency email available Contacts contained via the emergency email

Business Continuity Preparation, Test and Review		
Preparation Phase	Staff training:	<p>To ensure the effective implementation of the business continuity arrangements, managers are required to ensure full awareness and sufficient training of their people. This should include:</p> <ul style="list-style-type: none"> • introduction to the plan as part of the induction arrangements for new staff • knowledge of the business continuity policy and related arrangements • regular review and/or testing of contingency arrangements for which their staff are responsible for • regular update of associated information in the plan (e.g. contact and stakeholder details, alternative resources) • regular review and update of operational procedures and arrangements based on the process ownership to ensure changes which may have an impact on the plan are noted.
	Identification and testing of contingencies	<p>To respond successfully to adverse effects resulting from key incidents we have established a detailed procedure with relevant steps to ensure business continuity and protect the interest of learners. To ensure the contingencies are relevant, accurate and remain effective the plan is regularly tested and reviewed annually and earlier where change is needed. This is managed by the Quality Control Committee and outcomes approved by the Board. To serve this purpose three main methods are used for the identification and testing of the contingency plan and associated risks:</p> <p>Review sessions: This method is used to assess the planned contingency arrangements and related risks and identify any changes required across all areas.</p> <p>Scenario workshops: This method involves teams to check a scenario for its accuracy and suitability of the plans whilst getting familiar with plans and processes in response to an incident. The scenario is devised by the workshop facilitator who has the responsibility of preparing the scenario and any updates resulting from the workshop.</p> <p>Live/test simulation: This method is used to test the business continuity plan to ensure the successful and timely recovery or operations. These tests are organised by senior managers and carried out as realistically as possible in order to test the validity of the contingencies. The testing of scenarios is ideally held outside normal working hours so that resources can be used without affecting normal operations and involve the use of the planned and contracted contingencies if this is practical.</p>

<p>Response Phase</p>	<p>Emergency responses</p>	<p>We have established clear lines of responsibility and decision making in order to manage any adverse effects appropriately. The Response Team must be activated immediately and responsible for the:</p> <ul style="list-style-type: none"> • evaluation of the situation, (identify any adverse effects, its impact and the actions that should be implemented with associated priorities to ensure the maintenance of the development, delivery and award of our qualifications) • overall coordination of the recovery plan to ensure continuation of business as usual • agreement on the planning/coordination venue where appropriate • implementation of internal and external communication plan (in particular the regulators if applicable) which should also include information on the restoration date/time of operations if known and related actions to be followed • liaison with suppliers to develop a rebuild/repair schedule where appropriate • liaison with regulators if relevant to seek their expert in managing the extreme adverse effects • effective documentation of the incident as it occurs to inform the post-incident review and identification of lessons learnt.
<p>Post Event Phase</p>	<p>Post event analysis</p>	<p>Following an incident, the Strategic Management Committee will oversee the review and updating of the business continuity plan as necessary and arrange a de-brief. The Strategic Management Committee will prepare the log as soon as the incident occurs to enable the final review report to be produced which includes the following areas:</p> <ul style="list-style-type: none"> • Date and time of incident • Author • Incident description and • Evaluation of impact, including any adverse effects • Incident response and restoration times, where applicable • Contingencies implemented • Evaluation of the contingencies • Final business impact • Date and time of resolution • Outcomes, assessment and refinement • Review and update of relevant risks where required • Improvement actions and changes for Board approval. <p>All final decision making is made through recommendations to the governing body and their check and challenge is critical prior to decision making.</p>

3.2 Business Continuity Scenarios¹

The detailed continuity plan is contained in the *TAMS Business Excellence Matrix [Auxiliary Controls]*.

Category	Scenario title	Controller	Contingency Controller
Governance	Loss of Chair at short notice	Managing Director	Head of Education & Quality
Leadership	Loss of Executive Director at short notice	GB Chair	Parent Company CEO
People	Loss of staff member at short notice	Managing Director	Head of Education & Quality
	Reduction in workforce availability at short notice [mass]	Managing Director	Head of Education & Quality
Financial resources	Major mismanagement of finances	Parent Company Chair	Parent Company Senior Finance Officer
Physical resources	Compromised HQ	Managing Director	Head of Education & Quality
Technical resources	Outage of website	Managing Director	Head of Education & Quality
	Outage or hacking of IT systems and cloud	Managing Director	Head of Education & Quality

¹ This serves to ensure compliance with Ofqual Condition A6.3, A6.4, A7.1a

Section Four: Policy Review

Assessment and Refinement	
Systematic monitoring	<p>This policy is subject to systematic measurement of relevance and effectiveness. Upon receipt of valid evidence which suggests change is required the change management process is initiated. We are also proactive in managing policy and conduct a formal assessment on an annual basis. This serves to ensure suitability at all times.</p> <p>We pay due regard to all credible evidence and consider relevant data across systems and feedback from stakeholders to ensure that the policy remains appropriate and is deployed effectively to prevent adverse effects. In doing so, appropriate measures are selected to establish timely, reliable and accurate results.</p>
Learning and creativity	<p>Learning activities are undertaken to identify sound practices and improvement opportunities. This in turn is used to enable creativity and generate ideas for development. The output from measurement, learning and creativity is evaluated and used to identify, prioritise, plan and implement improvement and innovation.</p>
Improvement and innovation	<p>Following the effective monitoring and assessment of policy, decisions are made to establish refinements where appropriate, to ensure that the policy and associated deployment systems are fit for purpose. Based on the nature and type of changes required these are communicated across stakeholders and implemented accordingly.</p>

Appendix One: Communication Planning

Contact details for the Response Team			
Name	Job Title	Mobile Number	Email Address
David Batch	PEG Chief Executive Officer	07768 324001	dbatch@premier-education.com
David Batch	TWP GB Chair	07768 324001	dbatch@premier-education.com
Mekila Kelly	TWP Acting Managing Director	07887940479	mkelly@trainwithpremier.com
Andy Heald	TWP Head of Education & Quality	07920 008421	aheald@trainwithpremier.com

Contact details for Key Stakeholders				
Stakeholder Category	Name	Role	Telephone number	Email address
Parent Company: Premier Education Group	Duncan Goodhew	GB Chair	01953 499 040	dgoodhew@premier-education.com
	Gerry Dessler	GB Secretary and Senior Finance Officer Chief	01953 499 040	gdessler@premier-education.com
	David Batch	Executive Officer	01953 499 040	dbatch@premier-education.com
Awarding Organisation	The database of technical partners is contained in the cloud. This is downloaded weekly to host in the secure cloud to ensure ease of access in emergency.			
Technical partners/suppliers	The database of technical partners/suppliers is contained in the cloud. This is downloaded weekly to host in the secure cupboard to ensure ease of access in emergency.			
Workforce	The database of technical partners is contained in the cloud. This is downloaded weekly to host in the secure cupboard to ensure ease of access in emergency.			
Learners	The database of learners is contained in TAMS. This is downloaded weekly to host in the secure cupboard to ensure ease of access in emergency.			