Business Continuity and Risk Management Policy and Plan
Supply Chain

Introduction

Unpredictable and uncontrollable incidents with potential to impact partners and PTS systems, processes and resources we use to perform our duties could significantly reduce our ability to provide reliable services.

We therefore must develop, certify, and continuously improve a system for managing the continuity of our business across Professional Training Solutions Ltd, (PTS), to enhance our organisational resilience and ensure a state of readiness to successfully respond to any disruptive event.

Policy Aim

The Business Continuity Policy is aimed at ensuring that PTS can identify and mitigate business risks with partners in order to maintain or return to business as usual after a disruption, major incident or a crisis, and what is needed to cope with the effects of an emergency.

The Plan specifies the planning process and requirements, responsible staff or allocated responsibilities to partners and requirements for recovery that must be followed during the time of disruption, incident or emergency.   It provides guidance about the activities which will be carried out in planning for, managing and recovering after such events.

This policy is a formal acknowledgement that the Directors are committed to maintaining a strong risk management framework. The aim is to ensure that PTS makes every effort to manage risk appropriately by maximising potential opportunities whilst minimising the adverse effects of risks.

The plan should be used to support the internal control systems of PTS supply chain, to respond to operational, strategic and financial risks regardless of whether they are internally or externally driven.

Scope

The Supply Chain Business Continuity Policy covers all products, services, processes of PTS's supply chain and partnerships. The Directors believe that sound risk management is integral to good management and delivery of services. Risk management should form an integral part of PTS's decision-making and be incorporated within strategic and operational planning.

If the delivery of a product is partially or totally outsourced, the responsibility for its continuity remains with PTS. All parties supporting activities on behalf of PTS must also have business continuity management arrangements in place which are compliant with the business continuity requirements of PTS. These requirements must be included in due diligence process and contractual agreements.

Objectives

- To define and prioritise the critical functions of the supply chain business and partnership.
- To analyse the emergency risks to the business.
- To detail the agreed response to an emergency.
- To identify key contacts during an emergency.

1. **PTS - Responsibilities**

Directors / Senior Managers;
- Approve the Business Continuity Management Policy and Plan, organisation and development activities.
- Conduct a regular review of the Supply Chain Business Continuity Policy and Plan.
- Provide leadership for the Business Continuity Policy and Plan and appropriate resources for its execution.
- Ensure risk assessments will be conducted on all new activities and projects.
- Manage third parties to ensure compliance with PTS's Business Continuity Policy.
- Document Business Continuity Plans as incidents arise.
- Ensure the execution of the Supply Chain Business Continuity plans during exercises and in real incidents and maintain awareness across the business.

Supply Chain Manager ;
- To ensure that the risk management policy is known and implemented throughout the organisation and partners.
- To anticipate and consider emerging risks and to keep under review the assessed level of likelihood and impact of existing key risks.
- Provide regular and timely information to the Directors on the status of risks and their mitigation.
- To implement adequate corrective action in responding to significant risks; to learn from previous mistakes and to ensure that crisis management plans are sufficiently robust to cope with high level risk.
- To ensure that a culture of risk management is embedded throughout PTS supply chain and is open and transparent.
- Raise concerns via whistleblowing policy if needed

2. The Supply Chain – Responsibility

Leaders and Manager
- Must review and adhere to the Supply Chain Business continuity guidance set out in this policy.
- Must have business continuity management arrangements in place which are compliant with the business continuity requirements of PTS.
- Must inform PTS immediately of any incidents that occur that impact products, services, processes contracted
- Must regularly review the business continuity arrangements and supply these to PTS, this will form part of the partners performance reviews .
- To communicate PTS's approach to risk and set standards of conduct expected of staff.
- To set the level of risk appetite for the organisation as a whole and in specific circumstances.
- To ensure risk management is included in the development of business plans, budgets and when considering strategic decisions.
- To satisfy itself that less fundamental risks are being actively managed and controlled.
- Must familiarise themselves with their roles in the Business Continuity plans and support their preparation and execution during exercises and real incidents.
- To ensure that a culture of risk management is embedded throughout PTS supply chain and is open and transparent.
- Raise concerns via whistleblowing policy if needed

Staff involved with the contract
- Awareness of the Supply Chain Business continuity guidance set out in this policy.
- To be part of a culture of risk management, that is open and transparent
- Raise concerns via whistleblowing policy if needed

Monitoring and Review

The Directors will monitor the implementation and effectiveness of this policy with regards to its suitability, adequacy and effectiveness via its role in governance and oversight of the Supply Chain . Any improvements identified will be made as soon as possible.

This policy will be reviewed on an annual basis in line with PTS's standards and regulatory criteria. We will also consider any customer feedback, trends from our internal monitoring arrangements, changes in our practices, advice from regulatory authorities and other relevant external agencies as well as changes in legislation.

If you have any suggested changes to the plan, in the first instance please contact Zoe Huggins, Supply Chain Manager

Key Contacts

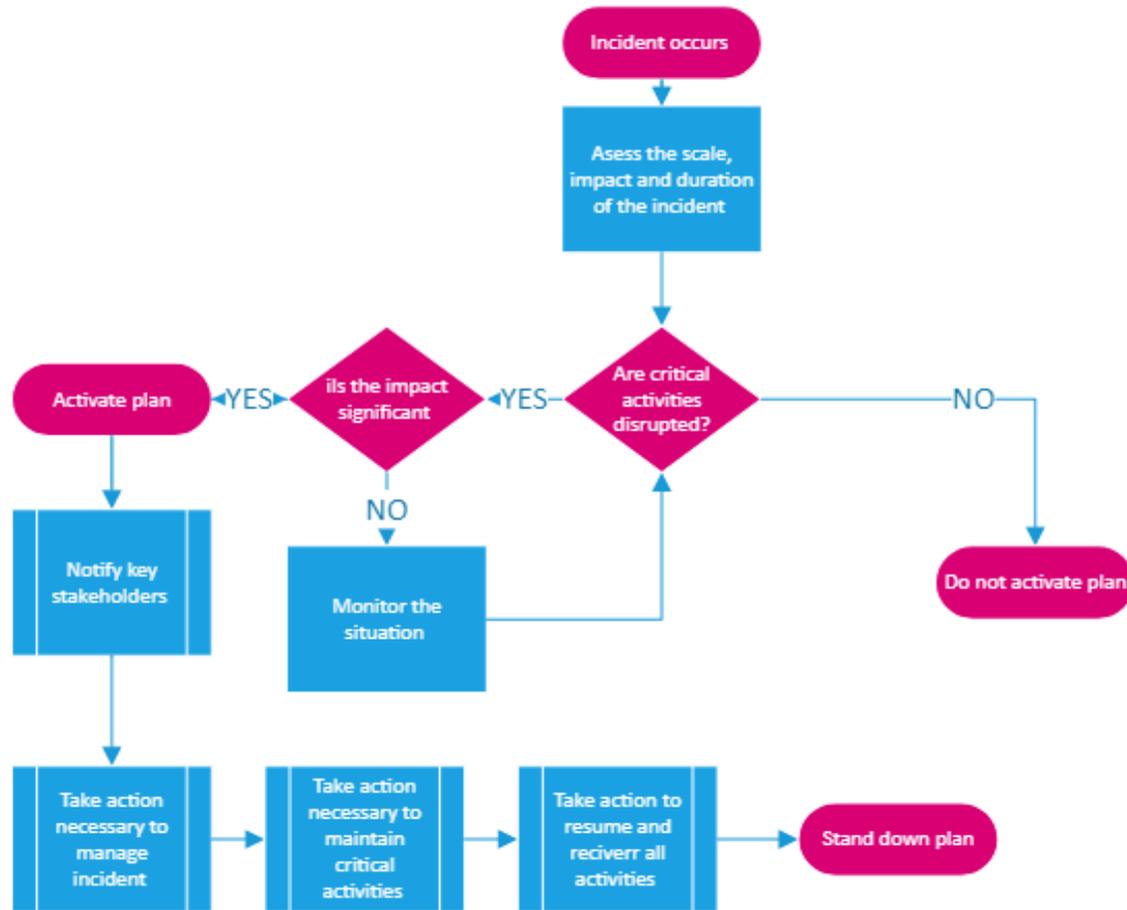| Contact	Office Number	Mobile Number	Role
Jackie Denyer	01252 712945	07775 732880	Managing Director
Neil Hardie	01252 712945	07889591020	Finance Director
Chrissy Payne	01252 712945	07957594059	Associate Director – Sales and Marketing
Zoe Huggins	01252 712945	Ext 612	Supply Chain Manager
Gary Turbuck	01252 712945	Ext 301	MIS & Compliance Manger

Activation Process

The decision to activate this plan lies with the directors. This Plan will be activated to manage the response to any incident causing significant disruption to normal service delivery, particularly the delivery of key/time critical activities. Plan activation triggers may include:

- Loss of key people or skills e.g., either within the partner organisation or PTS management of the Supply Chain. This would be above normal levels of absenteeism due to illness/injury or other scenarios such as severe weather, changes in service structures, major transport disruption, emergency response duties, or people leaving the organisation.
- Loss of critical systems impacting the partnership, management of the partnership or its governance and oversighting. ICT network disruption, telephony outage, power outage, utilities disruption or third-party supplier disruption.
- Denial of access, or damage to, facilities e.g., loss of a building through fire or flood, an external emergency where emergency service cordon would prevent access for a period, utilities failure. You may also require the activation of continuity arrangements in the event of an office move. Applied across the supply chain.
- Loss of a key resource such as an external supplier or partner vital to the delivery of a key service or activity.
- Insolvency of a partner or contract dispute
- Infectious outbreak, travel disruptions or natural disaster / environmental causes

If the incident is causing significant disruption, an appropriate message should be released to stakeholders/partners detailing:
- What is causing the disruption and the impact
- Action being taken to respond to the incident
- Estimated length of the disruption and return to business as usual
- Impact to learning or service

Incident occurs

Asess the scale, impact and duration of the incident

Activate plan ◄YES► ils the impact significant ◄YES► Are critical activities disrupted? ─NO─

NO

Notify key stakeholders

Monitor the situation

Do not activate plan

Take action necessary to manage incident → Take action necessary to maintain critical activities → Take action to resume and reciverr all activities → Stand down plan

Plan Implementation

In the event of the Supply Chain Business Continuity Plan being activated please complete the Business Continuity Management Log (appendix I)

There are three key stages to follow in the implementation of the business continuity plan.

Incident management Phase

- Protect the safety and welfare of staff, visitors and the public
- Protect vital assets e.g., equipment, data, reputation
- Ensure urgent and necessary communication takes place
- Support the Business Continuity phase
- Support the Recovery phase

Business Continuity Phase

- To ensure that 'critical activities' are resumed as quickly as possible and/or continue to be delivered during the disruption
- To activate one or more of your business continuity strategies to enable alternative ways of working
- To make best use of potentially limited resources by suspending 'non-critical' activities

Recovery Phase

- To return to 'business as usual' as quickly as possible
- To ensure any non-critical activities suspended as part of your business continuity response are recovered within appropriate timescales
- Where the impact of the incident is prolonged, normal operations may need to be delivered under new circumstances e.g. from a different building on a longer-term basis.

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Actions

The following actions should be considered at each stage;

Incident management Phase

- Make a quick initial assessment: Survey the scene/situation
- Assess the impact stakeholders, services and learning
- Disseminate information
- Call the Emergency Services if needed
- Evacuate the building if necessary
- Nominate individuals to carry out Incident Management roles, as appropriate.
- Ensure a log of key decisions and actions is started and maintained throughout the incident (appendix I)
- Where appropriate, record names and details of any people that may have been injured or affected by the incident as part of your incident record keeping
- Assess the key priorities for the remainder of the working day and take relevant action
- Take action to ensure the health, safety and well-being of stakeholders
- Consider implementing the business continuity strategies that apply, i.e. alternative ways of working, re-location to your recovery site etc to ensure the impact of the disruption is minimised
- Log all expenditure incurred as a result of the incident and seek advice/inform the Insurance Company
- Implement communications to ensure stakeholders are kept informed about what is required of them.
- If the incident is taking place outside of normal working hours, staff may need to be contacted to advise of any alterations to normal working arrangements for the next day

Business Continuity Phase

- Take time to understand and evaluate the impact of the incident on 'business as usual' activities by communicating with key stakeholders to gather information
- Plan how critical activities will be maintained, utilising pre-identified or new business continuity strategies
- Identify any other stakeholders who may be required in the business continuity response
- Depending on the incident, additional/specific input in order to drive the recovery of critical activities; this may require the involvement of external partners
- Log all decisions and actions, including what you decide not to do and include your decision-making rationale
- Deliver appropriate communication actions as required
- Log all financial expenditure incurred as a result of the incident
- Ensure methods of communication and messages are developed as appropriate to the needs of your key stakeholders e.g. Learners, Employers, Staff, Partners/Carers, Governors, Suppliers, Local Authority, Central Government Agencies etc

Recovery Phase
- Agree and plan the actions required to enable recovery of normal working practises
- Agreed actions should be detailed in an action plan and set against timescales with responsibility for completion clearly indicated
- Continue to record all expenditure incurred as a result of the incident
- Respond to any ongoing and long-term support needs of stakeholders
- Once recovery actions are complete, communicate the return to 'business as usual' to ensure all staff are aware that the Business Continuity Plan is no longer in effect
- Carry out a 'debrief' of the incident with stakeholders where appropriate. Reflect on opportunities for improvement and any lessons identified.
- Review this Business Continuity Plan in light of lessons learned from the incident and the consequent response to it

Business Continuity Strategies

Whatever the cause of disruption, the impacts will generally be one or more of the below categories of critical activities:

- Loss of key people or skills e.g., above normal levels of absenteeism due to illness/injury or other scenarios such as severe weather, changes in service structures, major transport disruption, emergency response duties, people leaving the organisation etc
- An Infrastructure incident resulting in the loss of critical systems e.g. ICT network disruption, telephony outage, power outage, utilities disruption, third party supplier disruption etc
- Loss of premises including denial of access, or damage to, facilities e.g. loss of a building through fire or flood, an external emergency where emergency service cordon would prevent access for a period of time, utilities failure etc. You may also require the activation of continuity arrangements in the event of an office move
- Loss of a key resource such as an external supplier or partner vital to the delivery of a key activity or insolvency
- Infectious outbreak, travel disruptions or environmental causes

The strategies below outline alternative ways of working designed to maintain our critical activities in the event of a disruption. This enables us to prepare by ensuring alternative ways of working have been agreed, tested and are fit for purpose.

Type of disruption	Mitigation
Loss of key people or skills	- Skills matrix or organisational chart available to easily identify other competent staff - Consider PTS supporting gap within its own capacity - Consider use of permanent and freelance staff to provide centre resilience - Use of agency / temporary staff - Multi-skilling/cross training to ensure staff can undertake different roles and responsibilities. This could involve identifying deputies /job shadowing/staff undertaking temporary additional duties - Suspend 'non-critical' activities to focus on priorities - Alternative ways of working e.g. Virtual classrooms to utilise existing resource further - Ensuring that the business continuity aspects of staff management are considered in all management arrangements, e.g. managing attendance, job descriptions, contractual requirements etc. - Use of expert witnesses and support from employers with specialist training requirements

Infrastructure incident	• Ensure lesson plans offer flexible delivery • Use a secure external network i.e.. SharePoint • Ensure manual workarounds are available • Access to systems should be tested regularly and available outside of the premises • Ensure staff have access to the resources required to work from home • Phone lines are virtual and can be re-directed
Loss of Premises	• Identification of alternative locations, training rooms and facilities • Ensure staff have access to resources to work from home at all times • Ensure staff take remote equipment ie. Phones and laptops home every night • Mutual agreement with employers o use on-site training facilities • Ensure virtual learning offer is live and accessible • Flexible lesson plans
Loss of a key supplier	• Strong Due Diligence • Pre-identified alternative suppliers • Do not rely on one income / revenue stream, diversify offering • Ensuring all external providers have a Business Continuity Plan in place • Insurance • PTS consider teach out • Regular performance monitoring and contractual review
Infectious outbreak, travel disruptions or environmental causes	• Ensure staff have access to resources to work from home at all times • Ensure staff take remote equipment e.g. Phones and laptops home every night • Alternative ways of delivery service e.g., Virtual classrooms to utilise existing resource further • Ensure lesson plans offer flexible delivery • Use a secure external network i.e. SharePoint to enable safe remote working • Skills matrix or organisational chart available to easily identify other competent staff • Communication tree, Comm's plan

Risk Matrix Score

A = HIGH Likelihood and HIGH Impact

B = LOW HIGH Likelihood and HIGH Impact

C = HIGH Likelihood and LOW Impact

D = LOW Likelihood and LOW Impact

Hazard / Risk	Impact	Control Measures	Risk Matrix Score
Flooding	• Documentation lost • Office furniture lost • No access to IT records or audit files • Site visits not able to take place • Teaching	• Insurance • In Business Centre Agreement • Review of offsite (cloud) storage/access of PTS documents (e.g., Citrix) for all to work at home/off site.	B
IT Failure	• Cannot do work • Cannot access files/databases • Cannot access contact details • Possible delivery method impact	• Weekly back up's – back up kept off site • Emails can be accessed through the internet on other sites/home • Hard copies of all critical documents/data/information kept in a file. Review of off site (cloud) storage/access of PTS documents (eg, Citrix) for all to work at home/off site. • Partner SharePoint	A
Loss of electricity	• Offices not habitable • No phones • No IT	• Business Centre Site Manager contacts • Ensuring all office based staff have mobile phones • Homeworking policy • Absence from Work Policy • Adverse Weather Policy	A
Fire	• Records Lost • Not able to produce records for government audits. • Loss of all equipment and resources	• Weekly back up of computer – kept off site • Annual Risk Assessment of office facilities. • Review of fire proof cabinets • Comprehensive records of all equipment/costs and resources • Must take their laptops at home after hours and at the	B

		assembly area if they have the equipment near at hand when the evacuation alarm is activated, in order to minimise possible loss of equipment and facilitate business continuity and recovery.	
Phone Failure	• *Customers and learners not able to contact us.*	• *Learners and employers are given mobile contact numbers* • *Process in the event of phone failure for all staff* • *Use of sipgate for phones, which means main office number can be transferred via the internet to another landline or mobile phone.*	*A*
Adverse Weather	• *Staff not able to attend work* • *Site visit not able to take place* • *Learners and tutors cannot attend training* • *Customers cannot contact* • *Ability to attend site for learning*	*Staff able to work at home Use of web-based /online contact and mobile phones to work with learners Use of social media to inform clients of situations Transfer of office phones to mobiles Continual review of updated technology*	*C*
Health Pandemic	• *Learning* • *Staff not being able to attend face to face sessions* • *Office closure* • *Staff illness* • *Leaner illness* • *National lockdown quarantine* • *Learners not continuing learning* • *Financial impact*	• *Insurance* • *Working paper fee* • *Ensure access / ability to work remotely* • *Health and wellness guidance* *Flexible learning programmes to include accessible and remote options Access to remote and blended learning* *Testing working at home for access* *Keeping cloud storage up to date and accessible* •	*B*
Restricted access to training rooms / facilities	• *Cancellation of courses, disruption of learners progression, access to courses or training*	• *Alternative links with employer sites established* • *Ability and funds available to book – off site premises for delivery* • *Remote / blended learning options vailable*	*B*

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Damage or loss of coursework / exam papers	• Delays to learner progress, non-compliance with awarding bodies, damage to reputation	• Staff training for handling work • Use of an e-portfolio to reduce paper hard copies • Fireproof cabinets available for paperwork storage	C
Staff Absence	• Delays to learner progress, disruption to business services, financial loss	• Partner have a strong resilience in staffing, there are multiplied skilled staff in all areas • Cross training or PTS support • Links with consultants and agency staff as a last resort	A
Removal / unavailability / delay of standards / Change of Funding Band (apprenticeships)	• Delays to enrolments, financial loss	• Diverse training offer dos not rely heavily on one specific standard	C
Loss of employer, partner contracts or insolvency	• Financial loss or clawback • Additional cost of managing • Teach out • Damage to Reputation	• Robust due diligence • Supply chain monitoring • Supply Chain governance and oversight at board • Manage risk and values with partners and own capacity • Risk reporting	B
Lost of funding ie. ROATP fail (Apprenticeship)	• Unable to deliver / continue delivering apprenticeships	• Ensure specialist support available for to assess readiness to deliver, adhere to quality and monitoring policies, ensure course offer remains diverse and does not rely solely on delivery of apprenticeships	D
Poor public feedback / ratings	• Damage to reputation, financial loss	• Continue to seek feedback regularly to inform improvements, continue rigorous self assessment, deal with complains or concerns	B

		prompty, ensure quality monitoring process is followed	
Inadequate OFSTED (PTS or Sub)	• *Damage to reputation, holds/ withdrawals of provision, financial impact, disruption to learner's progress*	• *Ensure all risk assessments are implemented with employers, log all accidents incidents and near misses and investigate thoroughly, follow health and safety procedure* • *Supply Chain oversight*	*B*
Learner welfare / safeguarding incident /Prevent	• *Damage to reputation* • *Risk to themselves or other* • *Not fulfilling duty of care*	• *Ensure all risk assessments are implemented with employers, log all accidents incidents and near misses and investigate thoroughly, follow health and safety procedure* • *Partner reporting and auditing across all methods*	*D*
Disruption to Data / funding returns	• *Financial impact, non-compliance issue / contract breach* • *Claw back* • *Disadvantage learner*	• *Ensure multiple staff are trained , that a designated manager is ion place to manage compliance to contracts and that business systems are in place ie. pics to support accuracy and ease of process. Follow process to ensure data returns are complete timely.* • *Supply Chain strategy defining roles and responsibilities* • *Seek legal advice for contract and claw back disputes*	*B*
Non-conformance / under performance of contracts	• *Financial impact, non-compliance issue / contract breach, impact on learner process*	• *Ensure managers are in place to manage contracts effectively and follow quality process to ensure monthly monitoring meetings are in place*	*A*
Poor achievement rates	• *Impact on learner progress and achievement, damage to reputation, financial impact*	• *Ensure initial assessment process is followed rigorously so learners are on appropriate courses,*	*A*

	• *Disadvantaged learner*	*follow delivery models and monitor progress monthly to ensure success.*	
Poor Subcontractor Management / Performance	• *Breach of ESFA regulations* • *Learners' disadvantages* • *Reputation*	• *Strong due diligence* • *Supply Chain strategy and policies* • *Designated staff in controlling and managing* • *Governance and oversight from board* • *Independent audits annually*	*B*
Withdrawal from an Awarding Organisation.	• *Disadvantage learners* • *Impact to quality and authenticity of learning and certification* • *Ability to offer accredited programme and impact to future revenue streams* • *Reputation*	• *Quality assurance process* • *Supply Chain strategy* • *Regular auditing* • *Observation*	*B*
Fraud or Theft	• *Mis use of public funds* • *Direct or indirect link to criminal activity & subsequent action* • *Reputation* • *Claw back* • *Loss of assets*	• *Fraud and anti-bribery policy (PTS & Partner)* • *Due Diligence* • *Whistleblowing policy* • *Insurance*	*B*
Exploitation of workers and or suppliers (availability and retention of suitable staff)	• *Reputation* • *Not fulfil duty of care* • *Indirect or directly involved in criminal activity*	• *Include in safeguarding policy* • *Training* • *Safer recruitment* • *Robust due diligence*	*B*
Environmental (mismanagement issues relating to fuel consumption, pollution etc)	• *Reputation* • *Financial cost*	• *Robust dur diligence* • *Environmental policy* • *COSHH & waste management*	*B*
Management incompetence / Poor leadership	• *Reputation* • *Lack of oversight and Governance* • *Loss if income*	• *Clear structure and KPI's* • *Clear recruitment and induction* • *Training, mentoring & support*	*B*

Lack of clarity over roles and responsibilities of partnership	• *Contract miss management* • *Lack of communication or miss information* • *Disadvantage learners*	• *Supply Chain Strategy, SOP & policies* • *Communication tree and clear monitoring* • *Onboarding*	*B*
Undisclosed conflicts of interests	• *Withdrawal or impact to tenders* • *Lack of transparency* • *Perceived as deception* • *Reputation* • *Loss of finance*	• *Declaration of interests* • *Supply Chain monitoring and review of use of consultants* • *Clear disclosures* • *In Due diligence*	*B*
Personality clashes	• *Relationship breakdown* • *Conflict and miss management of contract* • *Loss of business* • *Loss of finance*	• *Clear set of values* • *Complaint's procedure* • *Supply Chain rationale* • *Aligned 3 I's*	*D*
Indecisions or inaccurate information	• *Data error* • *Loss of funds, claw back* • *Miss management of contract*	• *Clear roles and responsibilities Supply Chain Strategy and rationale* • *Clear line management of contract* • *Board oversight & governance* • *Independent audits annually*	*D*
Health and safety constraints	• *Learning* • *Safety of all stakeholders* • *PTS or partners fault and investigation* • *Financial loss* • *Reputation*	• *H&S due diligence checks* • *H&S site visits* • *H&S employer forms* • *H&S reporting disclosures*	*B*
Change of government policy, regulation	• *Limit to subcontracting and financial capacity* • *Loss of revenue*	• *Expert and skilled staff* • *Training to keep up to date* • *Annual review of strategy*	*A*
War and disorder	• *Learning* • *Staff not being able to attend face to face sessions* • *Office closure* • *National lockdown emergency* • *Financial impact*	• *Insurance* • *Ensure access / ability to work remotely* • *Health and wellness guidance* • *Follow national emergency guidance*	*B*

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Emergency Response Checklist
For use during an emergency

- **_Start a log of actions taken:_**

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- **_Liaise with Emergency Services:_**

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- **_Identify any damage:_**

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- **_Identify Functions disrupted:_**

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- **_Convene your Response / Recovery Team:_**

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- **_Provide information to staff:_**

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- **_Decide on course of action:_**

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- **_Communicate decisions to staff and business partners:_**

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- **_Provide public information to maintain reputation and business:_**

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- **_Arrange a Debrief:_**

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- **_Review Business Continuity Plan:_**

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Appendix II - Log Sheet

Date	Time	Information / Decisions / Actions	Initials