



St Mary
Magdalene
Academy



RESILIENCE
Protecting What Matters

Business Continuity Policy

St Mary Magdalene Academy

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Introduction

Background

Whilst their occurrences may be rare, an emergency or a period of disruption can present a school with significant challenges, which is why all schools and academies must suitably prepare for either a school emergency or a period of disruption.

Statutory Requirements

All non-statutory guidance and best practice promotes that schools should have sound practices for managing risks and this includes having emergency plans and good business continuity management.

In addition, academies must meet statutory requirements which set out, under 2.3.5 of the Academy Financial Handbook 2015, the need to have a suitable plan in place, detailing:

"The Academy must make a contingency and business continuity plan setting out what the academy trust would do to ensure continued operation of the trust"

Policy Aim

The aim of this policy is to provide a simple and effective framework from which St Mary Magdalene Academy can meet its statutory obligations for business continuity.

Policy Objectives

The objectives of this policy are:

- to enable the academy to establish and implement an appropriate Business Continuity Management System (BCMS), as set out in the International Standard for Business Continuity Management, ISO 22301 - Societal security - *Business continuity management systems*
- to provide a framework which complements St Mary Magdalene Academy's existing risk policy and procedures, ensuring where possible, requirements of the policy slot in with existing arrangements;
- to enable the academy to respond both effectively and confidently to either an emergency or a period of disruption, thus ensuring the ongoing continuity of education to students, the protection of staff and student safety, and the protection of the academy's reputation; and
- to enable the academy to save money through the availability of better insurance options.

Scope of this Policy

This policy applies to the entirety of St Mary Magdalene Academy and its schools. This includes the Early Years Centre, Primary Department, Secondary Department and Sixth Form, as well as its Special Education Needs (SEN) school, The Courtyard. Throughout this policy, these schools will be collectively referred to as "the academy".

This policy enables the academy to prevent, mitigate, prepare for, respond to, and recover from the impacts of an emergency or a period of disruption. The scope of this policy sets out to cover any reasonable type or size of emergency or period of disruption.

Links to other Academy Policies & Objectives

This policy links closely to the following academy policies:

- Risk Management Policy;
- First Aid Policy;
- Fire Safety Policy; and the
- Health & Safety Policy.

Interested Parties

This policy has been developed with the following persons/parties/organisations in mind who have a vested interest in its development and implementation:

students, parents/guardians, staff, governing body, visitors, contractors, suppliers, insurer(s), OFSTED, neighbours, local community, nearby schools, media, local authority, emergency services, other response agencies

Definitions

The following definitions have been included for reference:

Business Continuity Management: Holistic management process that identifies potential threats to an organisation and the impacts to business operations those threats, if realised, might cause, and which provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities. [SOURCE: ISO 22301]

Business Continuity Management System: Part of the overall management system that guide organisations to respond, recover, resume, and restore to a pre-defined level of operation following disruption. [SOURCE: ISO 22300]

Business Impact Analysis: Process of analysing activities and the effect that a business disruption might have upon them. [SOURCE: ISO 22300]

Exercise: Process to train for, assess, practice, and improve performance in an organisation.
[SOURCE: ISO 22300]

Incident: Situation that might be, or could lead to, a disruption, loss, emergency or crisis.
[SOURCE: ISO 22300]

Maximum Tolerable Period of Disruption (MTPD): Time it would take for adverse impacts, which might arise as a result of not providing a product/service or performing an activity, to become unacceptable [SOURCE: ISO 22301]

Mutual Aid Agreement: Pre-arranged understanding between two or more entities to render assistance to each other [SOURCE: ISO 22300]

Prioritised Activities: Activities to which priority must be given following an incident in order to mitigate impacts [SOURCE: ISO 22300]

Recovery Time Objective (RTO): Period of time following an incident within which a product/service/activity must be resumed or resources must be recovered [SOURCE: ISO 22301]

Risk: Effect of uncertainty on objectives [SOURCE: ISO/IEC Guide 73]

Risk Appetite: Amount and type of risk that an organisation is willing to pursue or retain [SOURCE: ISO 22301]

Risk Assessment: Overall process of risk identification, risk analysis and risk evaluation [SOURCE: ISO Guide 73]

Models & Approach

This policy has been developed based on the requirements set out in the international standard for business continuity management, ISO22301 - *Societal security - Business continuity management systems*, ensuring that the academy's policy is both current and effective.

The international standard for business continuity management specifies the requirements to plan, establish, implement, operate, monitor, review, maintain and continually improve a documented management system to protect against, reduce the likelihood of occurrence, prepare for, respond to, and recover from disruptive incidents when they arise.

The requirements specified within ISO 22301 are generic and intended to be applicable to all organisations, regardless of type, size and nature. To reflect the type, size and nature of St Mary Magdalene Academy, this policy has been developed with six key stages which set out:

1. how the academy approaches the management of its resilience (See: Organise)
2. how the academy assesses its priorities and the risks to which it is exposed (See: Assess)
3. how the academy develops appropriate plans to respond to identified risks (See: Plan)
4. how the academy trains its staff on the plan put in place (See: Train)
5. how the academy's plan is tested/validated (See: Test)

6. how the academy reviews its work to ensure it remains relevant and fit for purpose (See: Review)

Policy Review Schedule

This policy should be reviewed annually, or if necessary:

- following changes to statutory or regulatory requirements;
- following a real incident or near-miss that requires activation/use of the academy's business continuity management policy/plan/procedures; or
- following a test or exercise of the academy's business continuity management policy/plan/procedures.

Policy Awareness

All staff must be made aware of this policy and understand the role that they play in the academy's business continuity policy, plan, and procedures.

Part 1: Organise

Introduction

The first stage of the academy's business continuity policy is "Organise" and sets out how the academy approaches the management of its business continuity.

St Mary Magdalene Academy's Business Continuity Objectives

The academy has established an objective for it to set up and implement an appropriate business continuity management system, in line with the requirements set out in the International Standard for Business Continuity Management, ISO 22301, by 1st September 2014. This will enable it to provide full assurance to the governing body and any future auditors on the business continuity arrangements in place.

Roles and Responsibilities

To enable the academy to meet its objective, the following roles and responsibilities have been assigned:

Executive Director: The Executive Director has ultimate responsibility to ensure that the academy meets its statutory and regulatory obligations, including those for business continuity management. As such, the Executive Director should:

- oversee the appropriate discharge of operational, day-to-day management for the academy's business continuity to an appropriate member of the academy's management team;
- receive regular updates on the status of the academy's business continuity, evaluate these, and where necessary take corrective action

Governing Body Members: The academy's governing body is responsible for obtaining assurances that the academy is meeting its statutory and regulatory obligations, including those for business continuity management. As such, the academy's governing body members should:

- receive regular updates, at least annually, on the status of the academy's business continuity, evaluate these, and where necessary ensure corrective action is taken

Director of Finance and Corporate Services: The Director of Finance and Corporate Services has the operational, day-to-day responsibility for ensuring the academy is meeting its statutory and regulatory obligations relating to business continuity management. As such, the Director of Finance and Corporate Services should:

- ensure that effective business continuity management is established, implemented and maintained in accordance with this policy;
- report on the performance of business continuity throughout the organisation to the Executive Executive Director and academy's governing body;

Senior Leadership Team Members: Senior Leadership Team members will be required to actively participate in any response to either an emergency or a period of disruption. As such, Senior Leadership Team members should:

- ensure that they know how and where they can access a copy of the academy's business continuity policy, plan and procedures and that they are familiar with the contents and the role that they have in preparing for, mitigating against, responding to, and recovering from an emergency or a period of disruption;
- ensure that they attend relevant training and participate in any tests/validation exercises of the academy's business continuity plans/procedures.

All Staff: All academy staff should ensure they have a basic awareness of the academy's business continuity policy, plan and procedures and that they are familiar with the role that they have in preparing for, mitigating against, responding to, and recovering from an emergency or a period of disruption.

Resources

For St Mary Magdalene Academy to meet its objectives, it will need to allocate resources as appropriate. This will include:

- staff resources (time)
 - staff with named roles and responsibilities within this policy will require time to develop, implement, monitor, and oversee the academy's business continuity management system (BCMS);
 - the development of the school's business impact analysis and risk assessment (See: Stage 2: Assess) will enable the academy to be presented with options to improve its level of resilience. Should the academy decide to implement these options, staff resources (time) may be required;
 - all academy staff will require time to undertake required training;
 - some academy staff will require time to participate in testing / exercises of the academy's business continuity policies/plans/procedures.
- financial resources

- the development of the school's business impact analysis and risk assessment (See: Stage 2: Assess) will enable the academy to be presented with options to improve its level of resilience. Should the academy decide to implement these options, funding may be required.

Reporting

Routine reporting on the academy's business continuity should be carried out in line with that which is detailed in Figure 1.

The Director of Finance and Corporate Services should report on the academy's progress and compliance towards business continuity along with any issues or risks that have been identified as a result of the work carried out. These reports should be made to the Executive Director twice yearly, or more frequently if required.

The Executive Director should report on the school's/academy's progress and compliance towards business continuity along with any issues or risks that have been identified as a result of the work carried out. These reports should be made to the academy's governing body and delivered annually, or more frequently if required.

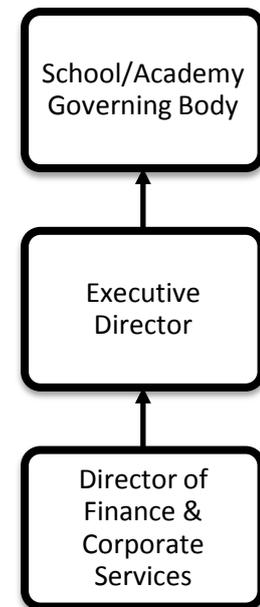


FIGURE 1: REPORTING

Policy

Before being introduced, this policy should be reviewed and signed off by the Executive Director and governing body. This ensures that there is the full support and "buy-in" from the academy's management and that the activities contained within this policy will be supported as necessary.

Following approval of this policy, all academy staff should be provided adequate time to read through and familiarise themselves with its contents, ensuring they are confident of the role that they have in preparing for, mitigating against, responding to, and recovering from an emergency or a period of disruption.

Documentation

Documentation shall be appropriately controlled to ensure:

- it is available and suitable for use, where and when it is required; and
- it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

Part 2: Assess

Introduction

The second stage of the academy's business continuity policy is "Assess" and sets out how the academy assesses:

- a) the risk to which it is exposed (See: Risk Assessment)
- b) the activities it must prioritise during any disruption (See: Business Impact Analysis); and
- c) the business continuity strategies available to the academy.

Risk Assessment

The business continuity risk assessment is concerned with identifying the risks that could trigger disruption to school activities.

The academy already has an existing policy and framework for managing risk and this will provide the basis from which the business continuity risk assessment will be completed.

Risk Identification

Before risks can be managed, they first need to be identified and to do this, the academy should:

- seek to involve a wide variety of staff to address the subjective nature of the work;
- review other existing risk registers; and
- review the local community risk register.

Risk Assessment

Upon identifying a list of potential risks that could trigger an emergency or a period of disruption, the academy should, for each risk:

- include a risk outcome description (what would happen if the risk was realised);
- include a risk score, based on the combined likelihood and consequence of the risk happening;
- include any existing controls in place to manage the risk; and
- include any actions required to further manage the risk (see below) and assign a member of the organisation responsible to oversee its management/completion.

Risk Management

The purpose of identifying and assessing risks is to enable the academy to appropriately see them managed. The academy can consider proactive measures that:

- a) reduce the likelihood of disruption;
- b) shorten the period of disruption; or
- c) limit the impact of disruption on the academy's key activities.

More specifically, the academy has a range of options of how to manage the risks it identifies, including:

- **Mitigation:** the academy can identify strategies, activities, modifications or controls aimed at reducing the risk;
- **Acceptance:** the academy can "accept" the risk and ensure that the risk is owned/overseen by the appropriate member of staff;
- **Transfer:** the academy can change a process, cease a practice, outsource a service or transfer the risk (if financial, then by means of insurance);
- **Elimination:** the academy can, if possible, remove the cause, avoiding the risk or introducing preventative measures;
- **Recovery:** the academy can develop and test recovery plans to deal with any threats and hazards identified. This will involve developing specific contingency plans as part of the academy's business continuity plan.

Business Impact Analysis

To support the development of the academy's business continuity plan, the academy must undertake a Business Impact Analysis (BIA).

Through the BIA the academy will:

- i. obtain an understanding of its activities and processes, the priority of these, and the timeframes for resumption following an interruption;
- ii. quantify the maximum tolerable period of disruption (MTPD) for each activity and process (MTPD is the time it would take for adverse impacts, which might arise as a result of not providing a product/service or performing an activity, to become unacceptable);
- iii. obtain the resource information from which an appropriate recovery strategy can be determined and recommended; and
- iv. quantify the resources required over time to maintain the key processes at an acceptable level and within the maximum tolerable period of disruption, information which will enable facilities, ICT and other supporting resources to develop their own continuity.

The Business Impact Analysis toolkit must be completed by each constituent part of the academy and reviewed annually. These will be collated by the Director of Finance and Corporate Services and used to inform the development of the business continuity plan and business continuity strategies.

Business Continuity Strategies

The identification and evaluation of a range of business continuity strategy options will enable the academy to choose appropriate ways of preventing disruption of its prioritised activities and dealing with any disruptions that take place. Selected business continuity strategies will provide for the resumption of activities at an acceptable level of operation and within agreed timescales.

Before developing any plan, the academy should determine appropriate strategy options for:

a) protecting prioritised activities

- a. reducing the risk to the activity;
- b. transferring the activity to a third party (though the responsibility remains with the academy); or
- c. ceasing or changing the activity if viable alternatives are available.

b) stabilising, continuing, resuming and recovering prioritised activities

- a. activity relocation - doing it elsewhere
- b. resource relocation/reallocation - moving staff/resources from one part of the academy to help out another
- c. alternate processes - establish alternate processes
- d. resource and skills replacement - enhancing skills/capabilities or creating additional resources through buying more staff/temp workers
- e. temporary workaround - some activities may adopt a different way of working which provides acceptable results for a limited time.

c) mitigating, responding to and managing impacts

- a. insurance - purchase of insurance may provide some financial recompense for some losses, but will not meet all costs (e.g. uninsured events, reputation etc.)
- b. asset restoration - contracting the stand-by services of companies that specialise in the cleaning or repair of assets following their damage
- c. reputation management - develop an effective warning and communication capability and establishing effective communications procedures

Part 3: Plan

Introduction

The third element of the academy's business continuity policy is "Plan" and sets out how the academy will develop an appropriate plan that guides the school to respond, recover, resume, and restore to a pre-defined level of operation following disruption.

Complementing Policies & Procedures

It is of vital importance that any plan or procedures are written to complement any other existing policies, plans or procedures within the academy. These include:

- Risk Management Policy;
- First Aid Policy;
- Fire Safety Policy; and the
- Health & Safety Policy.

Developing a Plan

In developing (or reviewing) its business continuity plan, the academy should:

- seek to engage with the Local Authority;
- ensure that the plan is reviewed and approved by the school governing body;
- ensure that the plan has clear document control measures in place (i.e. version control & revision history)
- identify the frequency with which the plan must be reviewed and updated;
- ensure that documentation is appropriately controlled to ensure it is available and suitable for use, where and when it is required, and so that it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity)

Contents of the Plan

The academy's business continuity plan should:

- set out how the academy would respond to a wide range of potential emergencies / disruptions and be flexible to respond to unanticipated threats and changing internal and external conditions;
- include strategies for continuing and recovering critical and essential school activities within agreed timescales (as specified within the school Business Impact Analysis);

- include a clear process for escalation and de-escalation that includes plan activation and stand-down (arrangements should be clear both in and out of school hours and in and out of term time);
- include a clear framework for assessing the impact of an incident as well as the thresholds that justify any initiation of a formal response;
- include 24-hour arrangements for alerting school management and other key staff and explains how contact lists will be kept up to date;
- include clear roles and responsibilities for both staff and departments;
- include action cards to support both staff and departments who have named roles / responsibilities within the plan;
- include clear command and control arrangements;
- identify where the incident will be managed from (i.e. an incident room);
- identify how actions and decisions will be logged during an incident;
- identify how extended working hours, if necessary, might apply and how these will be managed / funded;
- include important contact telephone numbers (internal & external);
- identify how the academy will manage its communications with school staff;
- identify how the academy will manage its communications with students;
- identify how the academy will manage its communications with parents and guardians;
- identify how the academy will manage its communications with the media and the local community, including:
 - a. a communications strategy
 - b. preferred interface with the media
 - c. guidelines or template for drafting a statement for the media, and
 - d. appropriate spokespeople.
- identify how the academy will respond to a sudden increase in incoming calls to the school during an emergency or period of disruption;
- identify the resources available to support the processes to manage a disruptive incident in order to minimise impact;
- ensure the academy has an adequate level of insurance to cover business disruption (including details of how this assessment was undertaken);
- ensure the academy has identified funding to support the immediate aftermath of either an emergency or a period of business disruption;
- include arrangements of how the school/academy will manage necessary stores and supplies;
- set out how the academy will continue or recover its prioritised activities within predetermined timeframes;
- set out how after an incident, the school will manage its recovery back to normality;
- set out how the academy would access and manage the delivery of any psychological services that were required during and/or after an incident;
- set out how after an incident, the school response will be evaluated through a formal debriefing procedure

Part 4: Train

Introduction

The fourth stage of the academy's business continuity policy is "Train" and sets out how the academy will train its staff on the plan put in place.

Training Needs Assessment

Whenever the academy reviews and updates its policy or plan, it is essential that an assessment be undertaken to identify training needs of staff.

Training requirements will vary from simple awareness training, which can be delivered through a memo or an email, to more comprehensive packages, which can include practical training and workshops. The level of training required will depend on the type/level of update and the level of staff.

To support this work, the academy should maintain a Training Needs Assessment and Training Register which should be reviewed and updated in line with wider reviews of the academy's business continuity.

Part 5: Test

Introduction

The fifth element of the academy's business continuity policy is "Test" and sets out how the academy tests and validates the plan put in place.

ISO 22300 defines an exercise as a process to train for, assess, practice, and improve performance in an organisation and exercises can be used to:

- validate policies, plans, procedures, training, equipment, and inter-organisational agreements;
- clarify and train personnel in roles and responsibilities;
- identify gaps in resources;
- assurance of the capacity of the alternate facilities (if applicable);
- develop of participants' competency and awareness;
- increase efficiency and reductions in the time needed to complete processes (e.g. using repeated drills to shorten response times);
- identify opportunities for improvement; and
- provide a controlled opportunity to practice improvisation.

Tests and Exercises

There are 3 main types of test/exercise that the academy can use to help validate its plans and procedures:

- Communication Tests: these involve testing the communication arrangements included within the plan. This might involve phoning named staff within the plan out of hours to check if the contact details are valid.
- Tabletop/Desktop: these include key members of the academy that might be involved in the plan and walking through the actions to a preset, unknown scenario
- Live Exercise: these involve physically carrying out a response to a hypothetical scenario

Test / Exercise Process

For any test/exercise, the academy should take the following steps:

- identify the aims and objectives of the exercise;
- select the type of exercise to be used (communication, tabletop, live);
- develop a realistic scenario that will enable the aims and objectives to be met;
- develop exercise injects and resources;
- ensure the right level of participation and involvement from the right people;

- carry out the test/exercise;
- carry out a debrief to identify lessons learned and actions required;
- produce a report, detailing the outcomes of the test/exercise, including an action plan for taking forward;
- share the full outcomes of the report with the academy's governing body; and finally
- once all actions have been completed, provide necessary assurance to the academy's governing body that actions have been completed.

Test Schedule

Tests and exercises are hugely valuable in helping a school understand the strengths and weaknesses of its plans and a schedule should be in place to support the implementation of these exercises.

This policy sets out that the academy should carry out, at a minimum, 1 x communication and 1x tabletop every year.

Part 6: Review

Introduction

The sixth and final stage of the academy's business continuity policy is "Review" and sets out how the academy monitors, reviews and evaluates its work to ensure it remains relevant and fit for purpose.

Business continuity is a cyclical process and one which can be continually improved upon. The academy should seek to monitor/review/evaluate its business continuity on a continual basis, but specifically:

- as part of an annual internal audit;
- following a near-miss;
- following an incident in which the business continuity plan is activated; or following
- the completion of a test/exercise (See Part 5: Test).

Internal Audit / Evaluation

As part of an ongoing cycle the academy should re-evaluate all of its arrangements that support business continuity, identifying the most vulnerable processes, improving their resilience and thereby reducing the level of risk faced by the academy. This should include reviewing, as part of a routine annual process, the academy's:

- business continuity policy;
- business continuity risk assessments and their associated action plans;
- business impact analysis;
- business continuity plan and strategies
- training needs assessment and training register; and
- exercise schedule.

An evaluation of the academy's business continuity procedures should verify that:

- a) all key products and services and their supporting activities and resources have been identified and included in the academy's business continuity strategy;
- b) the academy's business continuity policy, plans and procedures accurately reflect its priorities and requirements;
- c) the academy's business continuity is effective and fit-for purpose and will permit management, command, control and coordination of the academy's response to a disruptive incident;
- d) the academy's business continuity solutions are effective, up-to-date and fit-for-purpose, and appropriate to the level of risk faced by the academy;
- e) the academy's business continuity test/exercise programmes have been effectively implemented;

- f) business continuity strategies and procedures incorporate improvements identified during incidents and exercises and in the test/exercise programme;
- g) the academy has an ongoing programme for business continuity training and awareness;
- h) business continuity procedures have been effectively communicated to relevant staff, and that those staff understand their roles and responsibilities; and
- i) change control processes are in place and operate effectively.

Incident Reporting

Incident reporting is fundamental to the identification of risk and sound business continuity management and all staff are actively encouraged to use the academy's existing incident reporting mechanisms.

Post-Incident Reviews

In the event of an incident or near-miss that disrupts the school's/academy's prioritised activities, or requires an incident response, a post-incident debrief and review should be undertaken. This may include, through consultation and an organised debrief:

- identifying the nature and cause of the incident;
- assessing the adequacy of academy's response;
- assessing the academy's effectiveness in meeting its recovery time objectives;
- assessing the adequacy of the business continuity arrangements in preparing academy staff for the incident;
- identifying improvements to be made to the business continuity arrangements;
- comparing actual impacts with those considered during the business impact analysis; and
- obtaining feedback from interested parties and those who have participated in the response.

Similarly to a test/exercise, upon completing its review/debrief, the academy should:

- produce a report, detailing the outcomes of the debrief, including an action plan for taking forward;
- share the full outcomes of the report with the academy's governing body; and finally
- once all actions have been completed, provide necessary assurance to the academy's governing body these actions have been completed.

In the context of continual improvement, the academy may acquire knowledge on new business continuity technology and practices, including new tools and techniques. These should be evaluated to establish their potential benefit to the academy.

Audit Trail

Documented information relating to all periodic evaluations and their results should be maintained as evidence of the evaluations. These should be stored safely and securely.

Bibliography

ISO 22300, *Societal security - Terminology*

ISO 22301, *Societal security - Business continuity management systems - Requirements*

ISO 22313, *Societal security - Business continuity management systems - Guidance*

ISO/IEC Guide 73 *Risk management - Vocabulary*