



Business Continuity Policy

Policy Ref: TMP52v3

This policy will not discriminate either directly or indirectly against any individual on grounds of sex, race, ethnicity or national origin, gender, sexual orientation, marital status, religion or belief, age, disability, socioeconomic status, offending background or any other personal characteristic.

Prepared By Jackie Manning,
Job Title Assistant Director,
Designated
Safeguarding Lead

Signed

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Reviewed By Martin Heaton
Job Title Director

Signed

Date Dec 2020

Record of Changes

Version	Issue Date	Changes	Initials
v1	July 2019	Initial issue	JM
v2	July 2020	General procedural review, references updated, formatting changes	JM
V3	Dec 2020	Added Business Impact Analysis for BREXIT, Appendix C	JM

Date of Next Review: July 2021

Definition

Throughout this policy document **TMP Studios CIC** is referred to as 'TMP College'.

Introduction

The aim of having a Business Continuity Management System (BCMS) is to ensure that TMP College is able to maintain its activities in the face of disruptive challenges. Therefore, all Colleges and Services are expected to prepare, exercise, maintain and review BCP's based on the principle that each business area should be able to maintain its own critical activities which are key to contributing to the Strategic intention of the College.

This policy document defines a broad framework for the implementation of TMP College's BCMS to minimise the impact of business disruption. Full compliance with this policy will ensure procedures exist for recording, assessing and managing business continuity risk; identifying and prioritising essential activities; responding to business disruptions or incidents regardless of cause; and maintaining essential services (or restoring services to a minimum acceptable level).

This policy ensures that TMP College's Business Continuity Management arrangements are developed and implemented in a safe, prioritised and structured manner with the commitment of the senior management team.

Principles

TMP College's Business Continuity (BC) planning is devised to deal with the impact(s) of an event/situation/disruption as opposed to addressing the potential causes and such BC arrangements are crucial to the successful management of TMP College.

The Director will ensure that BCP's are reviewed at least annually, or earlier if subject to significant change and that any new system or activity has documented BC procedures that augment wider Business Area planning.

TMP College will provide adequate education and training as well as testing and exercising to validate its plans at regular intervals to ensure awareness of the requirements of this policy.

On completion of BCP's they should be stored securely with both an electronic and hard copy available locally.

BC planning is a dynamic, iterative, composite process, which allows for further development and adaptation as circumstances change or risks evolve.

Strategic BCMS Aim

To develop, implement and manage a robust and effective BCMS to protect College operations, including its staff, learners, visitors and contractors where reasonably practicable.

Strategic BCM Objectives

TMP College's strategic business continuity objectives are to:

- Provide a framework for the development, implementation and monitoring of a Business Continuity Management System (BCMS).
- Identify, assess and minimise business continuity risk.
- Ensure BCMS adequately addresses planning, processes, training and continuous improvement to manage disruptions that may affect the College or its interests.
- Support the delivery of TMP College's Business Development Plan.
- Safeguard TMP College's reputational integrity.
- Raise awareness of Business Continuity and the interdependencies between Teaching, Research and College Services.
- Recognise the Civil Contingencies Act 2004¹, its non-statutory guidance and align with the International standard for business continuity, BS ISO 22301:2019² and its guidance, BS ISO 22313:2020³.

Statement of Intent

TMP College is committed to developing, implementing and managing a robust and effective BCMS as a key mechanism to:

- Ensure a formal, consistent, co-ordinated and cost effective approach to the continuity of its teaching, research and logistical activities within the Education environment.
- Identification of the critical activities of its Business Area activity via robust Business Impact Analysis (BIA) and Risk Assessment (RA)
- Protection, maintenance and recovery of Business Area critical activities as recognised in relevant BIA.
- Developed BC plans will ensure continuity of activities at a minimum acceptable level and within specified timeframes.
- Develop a culture of Business Continuity Management (BCM) that feeds into the College's planning and management processes.
- Maintain the confidence of staff, learners and visitors
- Protect and uphold the reputation of TMP College and manage an up to date and relevant BCMS.

¹ <https://www.legislation.gov.uk/ukpga/2004/36/contents>

² <https://www.iso.org/standard/75106.html>

³ <https://www.iso.org/standard/75107.html>

TMP College will implement a programme of training, exercises, maintenance and review, which will be delivered through an annual work plan.

The Director will ensure that nominated Business Continuity Coordinators (BCC) maintain BC plans for critical activities within their areas of responsibility.

The development of TMP College's BCP's will incorporate the following:

- British Standards Institute, 2019. ISO 22301 Security and resilience — Business continuity management systems — Requirements.
- British Standards Institute, 2012. ISO 22313 Security and resilience — Business continuity management systems — Guidance on the use of ISO 22301.

BCC's will maintain and review BC Plans including the Business Impact Analyses on an annual basis or sooner if significant change is required due to circumstances.

All staff expected to respond to a disruption working for and on behalf of TMP College must be aware of the BCP appropriate for their areas of business and their role in preparation for an event/disruption.

Roles and Responsibilities

This section outlines the roles and responsibilities for relevant staff in respect of BCM.

Director

The Director has overall responsibility for Business Continuity Management within TMP College however delegates this Strategic responsibility to the BCC to ensure implementation of this policy throughout both College sites.

The Board

The Board will:

- ensure appropriate structures are in place to implement effective Business Continuity arrangements
- monitor the implementation of this policy
- raise issues of resource necessary for the adequate control of severe BC risks at the appropriate budgetary forums

Business Continuity Officer

The Business Continuity Officer is responsible for the development and implementation of the Business Continuity Management System, advising on compliance with non-statutory guidance and will:

- Provide specialist advice and guidance on BCM issues including the co-ordination, development, implementation and review of BC plans, processes and procedures

- Provide accessible reference data.
- Meet with identified representatives to establish routine and structure as well as the review of business Impact analysis and plans on an annual basis or when necessary
- Work in partnership with Safeguarding Officer to minimise threats
- Co-ordinate annual update of departmental BC plans
- Embed a Business Continuity culture through communication and the provision of awareness sessions, training and exercises to staff, according to their roles and needs
- Facilitate training, tests and exercises
- Audit compliance of BC plans
- Provide recommendations and other management feedback as appropriate
- Represent TMP College in the wider business continuity meetings

Local Business Continuity Management Teams

As part of the planning and response arrangements for any incident necessitating the invocation of BC plans, critical business stream representatives and coordinators roles will be nominated by the Director.

These individuals will take part in workshops to understand the methodology behind the preparation of Business Impact Analysis and Risk Assessment will form the teams which will effect the BC response upon the occurrence of an incident and conduct the annual review of arrangements pertinent to their Business Streams.

Emergencies Response Co-ordination

Upon the occurrence of a disruptive event involving wider consequences across TMP College, it may be necessary to escalate the response. The Director will convene the leadership team and co-ordinate communication and decision making during such a disruptive event.

A nominated individual will be identified to represent TMP College during multi-agency coordination of emergency response.

Incident reporting and debriefing

Business continuity incidents should be reported if the appropriate criteria are met and debriefs co-ordinated to ensure that learning and review informs continuous improvement.

Insurance

As part of the Risk Assessment, development, implementation and review of Business continuity plans any decision to treat, tolerate, terminate or transfer risk for indemnification purposes must be documented and appropriate consultation sought with the insurance and risk manager.

Procurement

TMP College has a number of suppliers and partners on whom it relies upon to provide a continued service. In order to minimise any risk of disruption by failure to supply a product or service these will be identified in the Business Impact Analysis with mitigations identified.

Governance

The board convenes quarterly and will oversee the implementation and monitoring of TMP College's BCM Strategy.

Training, Awareness and Exercising Maintenance and Review

BC plans are to be validated at regular intervals to determine whether any changes are required to procedures and responsibilities. Planned review periods should not exceed 12 months.

The Business Continuity Officer will:

- Develop or source a suitable programme of training in BCM and BC risk management.
- Identify appropriate levels of training and awareness for BC Coordinators, to enable cascade through their areas of activity to affect a strong BC culture across TMP College.
- Organise exercises of the BC Plans, and advise on local exercising arrangements
- Prepare and monitor the annual resilience work/action plan.

Monitoring Compliance with this Document

The table below outlines the monitoring arrangements for this policy document. TMP College will commission additional work or change the monitoring arrangements to meet organisational needs.

Aspect of compliance or effectiveness being monitored	Monitoring method	Individual responsible for monitoring	Frequency of monitoring activity	Group /Committee which will receive the findings/ monitoring report	Group/committee/individual responsible for ensuring that the actions are completed
Policy Cohesion	Peer review	Business Continuity Officer	Annually	Board	Director

Appendix A

Definitions

Business Continuity Management System (BCMS)

An ongoing Management and governance process supported by the College Senior Management Team and appropriately resourced to implement and maintain Business Continuity Management.

Business Continuity Management (BCM)

The holistic management process that identifies potential threats to the College and provides a framework for building resilience and the capability for an effective response that safeguards the interests of its Colleges and Services, reputation and value creating activities.

Business Continuity (BC)

The capability for the College to plan for and respond to incidents and business disruptions in order to continue business operations at an acceptable predefined level.

Business Continuity Incident (BCI)

An event or occurrence that disrupts an organisations ability to deliver normal service and where contingency arrangements are required to return them to an acceptable level.

Business Continuity Governance Board (BCGB)

A strategic level group convened to direct the College's Business Continuity Management System

Business Continuity Plan (BCP)

A clearly defined, documented and predetermined plan for use when business operations are disrupted by an event. Typically, the plan covers loss of premises, information, people, stock or other technologies.

Business Impact Analysis (BIA)

The process of analysing business activities which support wider organisational products and services, determining threats and risks and the effect business disruption may have on organisational viability

Risk

Identification of potential vulnerability based on likelihood and impact.

Risk Assessment (RA)

The overall process of risk identification, analysis and evaluation

Maximum Tolerable Period of Disruption (MTPD)

The point at which an organisations viability will be irrevocably threatened if the critical activities cannot be resumed.

Recovery Time Objective (RTO)

The target time for the resumption of a critical activity after an event.

Appendix B

References

British Standards Institute, 2019. ISO 22301 Security and resilience — Business continuity management systems — Requirements.⁴

British Standards Institute, 2012. ISO 22313 Security and resilience — Business continuity management systems — Guidance on the use of ISO 22301.⁵

The Business Continuity Institute good practice guidelines 2013 global edition. A Guide to Global Good Practice in Business Continuity.⁶

British Standards Institute, BS11200:2014: Crisis Management. Guidance and good practice.

British Standards Institute, 2011. PD 25111; 2010 Business Continuity Management – Guidance on the Human aspects of Business Continuity.

British Standards Institute, 2011. PD 22318:2015 Business Continuity Management – Guidelines for supply chain continuity.

British Standards Institute, 2011. PD 25888; 2011 Business Continuity Management – Guidance on organisation recovery following disruptive incidents.

Data Protection Act 2018⁷ and General Data Protection Regulation (GDPR)⁸.

⁴ <https://www.iso.org/standard/75106.html>

⁵ <https://www.iso.org/standard/75107.html>

⁶ <https://www.thebci.org/uploads/assets/uploaded/5c0205f3-a9ff-4f81-9695c3813b674a3b.pdf>

⁷ <https://ico.org.uk/for-organisations/data-protection-act-2018/>

⁸ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

Appendix C: Business Impact Analysis for BREXIT (December 2020)

Background

In March 2017, the United Kingdom (UK) Government officially notified the European Union (EU) of UK's intention to withdraw from the EU. The UK formally left the EU on 31 January 2020 and a transition period running to 31 December 2020 was initiated. During this period arrangements have largely remained the same while UK government and EU representatives have been negotiating a deal on the future relationship between the UK and the EU.

At the time of writing (December 2020) a deal has not been struck and it is not clear what the future relationship will look like.

In order to comply with its Business Continuity Policy, TMP College has completed a Business Impact Analysis to review the risk associated with the Brexit process to the learners, staff and operations of TMP College.

The following sections assess the risk across the various areas of the business.

College Staff and Students

At the time of writing, every single staff member and every learner enrolled on a course at TMP College is a UK Citizen and there are no EU or overseas nationals.

TMP College does not manage any residential accommodation for students.

Travel to the EU

At the time of writing, there are no overseas student trips planned for 2021.

TMP College does not currently have any student exchanges in place or planned.

Fuel Supplies and Domestic Travel

TMP College campuses in Wigan and Pemberton are not at significant risk of possible travel disruption.

Capital Projects

TMP College does not have any current or planned time-critical capital projects which could be negatively affected by the BREXIT process.

Data

TMP College does not:

- Receive personal data from international partners including the EEA
- Operate in the European Economic Area (the EEA), which includes the EU15

Appendix C: Business Impact Analysis for Brexit (cont..)

Data transfer within the UK currently complies with the General Data Protection Requirements (GDPR) because the UK has adopted the EU directive via the 2018 Data Protection Act. As TMP College does not transfer any data into or out of the UK, there will be no change.

ITC Software and Data Handling

All of TMP's data is held on servers within the UK and can still be accessed without any delays or restrictions. At the time of writing, to the best of our knowledge all software used by TMP College will still be maintained and supported.

Food Supplies

TMP College does not provide catering to learners at their campuses. Basic facilities are provided for the use by learners.

Staff will monitor any impact of price rises on more vulnerable students (for example younger learners living in low income families or adult learners who are on benefit).

Pharmaceuticals

The government's reasonable worst-case assumption predicted possible impact on the supply of pharmaceuticals but this is an area where the NHS system has put in a lot of work to avoid problems.

Individuals are responsible for their own health but TMP College staff will remain vigilant to ensure they can protect staff and learners.

Conclusion

The BREXIT process is unlikely to pose any significant risks to the learners, staff and operations of TMP College, regardless of the final arrangements negotiated between the EU and UK.

TMP College has taken steps to ensure business continuity through the BREXIT process, and at this time we are in a good position to ensure continuity. However we will continue to monitor the BREXIT process and make adjustments to our plans and notify all relevant parties as necessary.