Our Place Group

Business Continuity Plan

Policy No	Version	Date	Policy Owner	Review Frequency	Review Date
OPG37	1	May 2021	Commercial Director	Annually	May 2022

Approved by	Name	Date
DofS&C	Sarah Davies	May 21

Review Sheet

The information in the table below provides details of this document's reviews and where appropriate, amendments which will have been made to a later version and the reason.

Version	Review Description	Date
1	Original Policy	May 21

1.0 Business Continuity Statement of Intent

The Our Place Group which includes Our Place Schools, The Orchard @ Our Place and Lakeside @ Our Place provides a caring and safe environment for young people of mixed gender with special educational needs and Learning Disabilities (including Autistic Spectrum Conditions) and associated challenging behaviors.

The Group recognizes the potential strategic, operational, financial and stakeholder support risks associated with service interruptions and is committed to ensuring its young people, employees and stakeholders can access essential services in the event of a crisis or disaster situation, and therefore support a comprehensive programme for business continuity, disaster prevention and recovery of the company operations and business activities during a business interruption event.

Whilst most incidents within Our Place can be dealt with following day to day procedures, there are more serious incidents which will require an established emergency response. The Business Continuity Plan has been developed to ensure we are prepared for and are able to recover from, unexpected disruptions that are critical to the operation of Our Place.

Signed by: _____

Position: _____

2.0 Introduction

2.1 Defining a crisis/business interruption

Here at Our Place, we appreciate that everyone may have different definitions for what a crisis or business interruption may be, we define it as being an exceptional event that requires out of the ordinary resource and focus. They can arise from both sudden incidents and/or escalating issues, which can be either internally or externally driven.

Examples of incidents that may lead to a reputational or operational crisis/disaster include:
- Adverse regulatory findings
- Natural disasters such as flooding, acts of god etc
- Legal Action
- Cyber security breach
- Breach of safeguarding responsibilities
- Unfavourable press

We require the commitment of each employee, department, stakeholder and supplier to support the objectives required to protect the company assets, mission, values and survivability.

2.2 Policies and Procedures

This plan has been created in accordance with, and will be implemented alongside the following policies and procedures:

- Bomb Threat Policy
- Adverse Weather Policy
- Fire Safety Policy
- Infection Control Policy
- Employee Handbook
- Data and E Security Breach Prevention and Management Plan

2.3 Business Continuity Responsibility

Our Place Group recognize the need for Business Continuity Plans to be developed, implemented, tested and reviewed, this will be the responsibility of the Commercial Director with the support of the wider strategic team.

It is the responsibility of this team to ensure that during times of crisis/disaster/business interruption that the brand is protected where reasonably possible and that the operational 'Crisis Management Team' ensure the safety and welfare of our young people and staff.

This Commercial Director will be responsible for invoking the use of the 'Crisis Management Team' (the Director will deputise in times of absence of the Commercial Director) and the

processes associated with this and will be the external facing representative of the organisation during times of crisis/disaster/business interruption.

The Commercial Director will be responsible for invoking the use of a business continuity centre (alternative business location) if business services will be interrupted for more than 24 hours

The Strategic Team will review business continuity plans on a quarterly basis, and will take account of both internal and external trends when looking at any update to plans needed

The Commercial Director will also chair the 'Crisis Management Team'

2.4 Business Continuity Testing

Business Continuity Plans in the event of crises, should be tested at least annually to ensure credible recovery preparedness. The scope, objectives, and measurement criteria of each test shall be determined and coordinated by the Crisis Management Team on a 'per event' basis.

3.0 Crisis Management

3.1 Preparing for a crisis/disaster/business interruption

By carefully planning, agreeing and sharing the first steps that will be taken in a crisis situation, takes away the guess work. This allows key personnel to focus on the issue at hand from the very beginning.

There are numerous ways in which a potential crisis is identified. This can be through press monitoring, publication of regulatory report, internal/external cyber attack, to name just a few.

A notification may also come via any number of employees. In all cases, a clear and well socialised issues notification system must be in place to ensure potential issues are reported in an effective and timely manner.

To do this we have an email address contactus@ourplacegroup.com and we have a telephone number 01886833378 that both internal and external stakeholders can use to report an issue/potential issue. This email inbox will be monitored regularly, and the telephone number will be answered in a timely manner.

Staff can also report potential issues to the designated internal staff member responsible for logging issues- within Our Place Group this is the Health & Safety Manager.

We have a very open-door policy within Our Place therefore staff can also raise an issue to their line manager, a member of senior leadership, an 'on call' manager or a member of the HR team to name just a few.

We will ensure that the process and contacts are communicated regularly via email or notice through other internal mediums.

Once potential issues are flagged internally and are reviewed by the designated contact, they will then raise them to the Commercial Director who will decide whether to invoke the 'Crisis Management Team'

3.2 Assessment of potential crisis situation

Any potential crisis/disaster/ business interruption should be assessed to determine the impact or potential impact, on the safety of our young people, staff and Our Place as a whole (this could for example be reputational). An initial response log has been created (see Appendix 1)

Our Place has defined a risk-rating system to determine the likelihood of an incident occurring, the possible impact of such an incident, and should be used to assist with the decision to invoke the crisis management team or not.

Note: A potential crisis/disaster/business interruption with unclear impacts should be brought to the attention of a member of the CMT as soon as possible.

Example Risk-rating are defined below:

Risk-rating	Description	CMT Invoked
Minor	• Minor disruption to an area of Our Place services and can be managed through normal operational activities • Disruption is not serious or widespread and is unlikely to affect operations to a significant degree • No significant impact on staff or young person's safety • The crisis management team needs to be notified and the incident needs to be monitored • Possible partial or full activation of the Business Continuity Plan	CMT Informed: *Notified via email of minor disruption*
Significant	• Disruption affects more than one area of the organisation but remains self-contained • The affected area has the capacity to manage the disruption – with or without support • May require activation of specific resources, e.g. ICT • Significant impact on staff or pupils' safety • CMT needs to be notified to discuss whether to activate the Business Continuity Plan • Escalation of the incident needs to be monitored	CMT Informed and decision to invoke decided by Commercial Director

<td style="background:orange"></td>	• Likely partial or full activation of the Business Continuity Plan	
Major *(red)*	• Disruption affects the whole Organisation and possibly the local community • Major impact on young person or staff safety • Major impact to brand reputation or legal action impending • Affected area does not have the capacity to manage the disruption • Requires the activation of specific resources, e.g. ICT • CMT needs to be invoked to activate the Business Continuity Plan • Escalation of the incident needs to be monitored • Activation of the Business Continuity Plan, where necessary	CMT Invoked: *Emergency Meeting Arranged*

3.3 Crisis Management Team

The Our Place Group recognise the importance of timely responses to a crisis and therefore commit to having a 'Crisis Management Team'.

The Crisis Managements Team's (CMT) prime aim is the safety and welfare of children and staff. Thereafter the CMT's aim is to minimise the impact and disruption to the school or homes during a major incident, by providing a focused and structured response.

The CMT consists of the following roles within the organisation

- Commercial Director- Chairperson (Director will deputise in absence of C Director)
- Head of HR
- Health & Safety Manager
- Head of Maintenance
- Head of Education
- Head of Care

The CMT are responsible for:
- Ensuring the safety and welfare of children and staff remains a priority during a crisis/disaster/business disruption
- Information is passed from the CMT to the CMT Chairperson allowing them to make considered management decisions
- Leadership, delegation and coordination is provided to responding staff
- All management and staff are informed of the situation and the actions that they must take in a timely and consistent manner
- The appropriate external stakeholders (eg parents, local authorities, GP's, banks, auditors etc) to the school/home are informed of the situation, timely.
- The situation is kept under review and those outlined above are informed of any developments as appropriate.

- Ensuring Risk Assessments in place for potential crisis/disaster/business interruption scenarios are considered and where applicable amended or followed
- Communicating current business continuity plans and disaster recovery plans within their function

The first task of the CMT once invoked, is to meet virtually or in person to ensure the safety of children and staff, to find out what has happened or may be about to happen, assess the impact to Our Place from a people, asset and business perspective, to resolve conflicts of interest and to prioritise actions.

The Chair Person will minute the meeting and will assign tasks to members of the CMT and will begin the completion of a crisis/disaster/business interruption event log. (Appendix 2 details a template event log)

3.4 Supporting Information

Here at Our Place we have access to a central server which is cloud based and can be accessed remotely, on here we hold a plethora of documents available to the CMT, we also have a designated folder titled Business Continuity which will hold relevant documents to support the CMT when faced with managing a potential/ actual crisis, this would include (this list is not exhaustive)

- Emergency contact details for utility companies/neighbours/local authority contacts etc
- A list of local accommodation providers and contact details
- Risk Assessments for certain scenarios already identified e.g adverse weather/fire/cyber attack etc
- Building Plans including emergency lighting etc

A hard copy of these will also be kept securely with the Commercial Director.

4.0 Crisis Recovery

Our Place Group are committed to delivering best in class services and ensuring the safety of the young people, staff and stakeholders at all times, and will therefore endeavour to ensure that the resumption and recovery of time sensitive business operations is a priority both during and post any crisis/disaster/business interruption

Post any crisis/disaster/business interruption the CMT will meet to de-brief, the scope, objectives, actions and measurement criteria for future events shall be determined and coordinated by the Crisis Management Team on a 'per event' basis.

5.0 Crisis Management Testing and Review

This plan and the processes that it describes will be reviewed regularly in order to ensure that the organisation is fully prepared to respond to and recover from any crisis.

The plan and the process should be tested annually. Scenario-driven exercises will be used to test the plan.

The scope, objectives, and measurement criteria of each test shall be determined and coordinated by the Crisis Management Team on a 'per event' basis.

Appendix 1- Initial Response Log

Requirement	Other action to take	Responsible person	Completed? (✓)
Initial response			
Incident			

Assess the severity of the incident or potential incident
 	
(information to be passed to emergency services-**METHANE**)
	• Determine:
	
	   – **M**ajor incident declared / CMT Initiated?
	
	   – **E**xact Location
	
	   – **T**ype of Incident
	
	   – **H**azards Present or Suspected
	
	   – **A**ccess - routes that are safe to use
	
	   – **N**umber, Type, Severity of Casualties
	
	   – **E**mergency Services Present or Required - **CALL**		

Initial Actions	• Call emergency services if necessary • Evacuate/invacuate/lockdown the school building if necessary • Assess impact on pupils and staff • Disseminate information to others		

Nominate individuals to carry out the following roles:
 	
• Business continuity
 	
• Communications
 	
• Log-keeping
 	
• Media management
 	
• Resources
 	
• Welfare
	• Remember to:
	
	  – Allocate tasks amongst the CMT.
	
	  – Ensure staff are clear about their responsibilities.
	
	  – Establish the location and frequency of meetings.		

Inform all other staff of the incident	• CMT member responsible for communication is to create template communication and circulate accordingly		
Consider how the incident affects extended services	• Liaise with extended services as necessary		
Maintain a log of any injuries sustained to pupils, staff or visitors	• Ensure the log is provided to emergency services		

Work closely with other services, e.g. emergency services, as required	• Provide information to those arriving on the premises. • Ascertain the whereabouts of all pupils, staff and visitors and ensure emergency services are aware of anyone who is unaccounted for		
Contact relatives/guardians if appropriate	• Decide the most appropriate method – if the incident is very serious, liaise with the police about informing next of kin		
Where the incident involves failure of ICT systems or a loss of data, take steps to maintain security of systems as appropriate	• Liaise with the Data Protection Officer to maintain security of the school's network and data • Refer to the Data and E-Security Breach Prevention and Management Plan • Attempt to recover important documentation • Contact organisations which can assist with document recovery if necessary • Notify the ICO of personal data breach within 72 hours, if necessary • Notify data subjects of personal data breach, if necessary		
Resources			
Secure any affected premises	• Consider disabling utility supplies		
Maintain access to site entrance	• Ensure emergency services can access the premises as required • Prevent parking in restricted zones		

Work with staff and the emergency services to control access to the site	• Advise staff to check the identity of others when arriving at the premises • Provide authorised visitors with ID badges and ensure they sign in and out • Ensure media access is controlled • Advise emergency services of any property related issues or hazards, e.g. asbestos, and provide with a site map if appropriate		
Welfare			

Establish arrangements to meet the welfare needs of pupils, staff, parents, visitors and others	• Identify pupils who may require additional support:
	
	   − Those with SEND
	
	   − Those with other medical needs
	
	   − Those with personal emergency evacuation plans
	
	   − Any individual who is particularly vulnerable or badly affected, e.g. a witness to the incident
	
	• Identify any staff members, volunteers, parents or others who may be particularly affected by the incident		

Log-keeping			
Attend meetings held by the Crisis Management Team	• Keep a log of important information, actions taken and decisions made		

Ensure that each member of staff keeps an incident log	• Incident logs should be regularly communicated to the appropriate incident response team, who should then communicate to other members of response teams		
Communications			
Dedicate telephone lines for incoming and outgoing calls	• Arrange extra support at reception if necessary		
Record a new message on the answerphone if appropriate	• Consider setting the phone to 'answer only' mode		
Inform those involved in the response of any communication difficulties, e.g. poor signal	• Help staff with any communication needs		
Media management			
Organise appropriate responses to media requests	• Seek support from other organisations as appropriate, e.g. emergency services or the LA		
Control media access to the premises, staff and pupils	• Avoid allowing access to the site, pupils or staff unless there is a reasonable reason to do so and consent has been sought • Liaise with the police if necessary • Designate a specific area for the media, away from the site entrance		
Develop a brief media statement	• Information must be limited until facts are clear and all parents have been notified		

Activity Log

Completed by:		Sheet number:	
Incident:			

Time	Log details	Further action required	Signed by