

# Continuity of Provision Policy

## **Continuation of Apprenticeship Delivery**

#### Plan for continuity of apprenticeship training

Firebrand Training is committed to ensuring the highest standards of apprenticeship experience. A key factor of this being the continuity of the learning programme for the duration of every apprenticeship delivered.

As part of its overall quality planning process Firebrand Training carries out annual self-assessment against elements of the new Ofsted Inspection Framework that apply to an 'outstanding' organisation as it strives to achieve the highest standards of delivery and apprentice experience and welfare.

As ensuring business continuity is a key part of this, Firebrand Training has an action plan in place that covers activity to mitigate against any disruption in the business. This is monitored and updated at regular senior management team meetings. The plan includes how we will manage:

- Alternative communication channels
- Alternative modes of transport
- Alternative site of operations (inclusive of remote delivery OIL (Online Instructor Led))
- Back-up of business-critical systems
- Back-up and restoration of data

Note: Salient contact information in the event of a substantial incident (inclusive of actions on the inability to continue apprenticeship delivery) including ESFA are included at the close of this document.

#### Purpose of Plan for continuity of apprenticeship training

Firebrand Training has considered the key risks that could affect the continuity of apprenticeship training. The risks are outlined below, together with our plan to mitigate them. The plan is drawn from and relates to Firebrand Training Business Continuity & Disaster Recovery Policy. The purpose of the plan is to provide a systematic approach for the securing, protecting and recovery of the business to ensure the continuity of training for apprentices. It provides a framework for the management, development, implementation and maintenance of a disaster recovery programme.

#### Responsibilities

The responsibility for the management and oversight of the plan for continuity of apprenticeship training rests with Ben Hansford, the Chief Operating Officer of Firebrand Training. In the absence of the COO the contact is the Global Operations Director (Kiely Makepeace).

Risk to continuity	Statement	Mitigation/management
Alternative communication channels	Firebrand Training recognises the significance of the establishment of alternative communication channels, especially relating to the welfare and safeguarding of apprentices.	During apprentice on-boarding we provide salient information within the commitment statement, namely contact details for key areas of the organisation. We also provide this during the induction webcast and host these on the VLE via an e-learner handbook that lists normal channels of communication and a set of emergency contact details.
	We categorise the risks posed by the loss of normal channels of communication dependent on the timeframe and criticalness associated with the outage.	<b>1. Restoration of email communications</b> Alternative email addresses are provided using a different URL. Cloud based email clients through Office365
	<ol> <li>Loss of email communications</li> <li>Loss of telephone communications</li> <li>Loss of website communications</li> </ol>	<b>2. Loss of telephone communications</b> Firebrand staff have both a landline and mobile contact numbers. Alternative contact can be made through the e- portfolio system. Mobile numbers are replicated within the Microsoft Teams platform for VoIP (Voice of Internet Protocol)
	4. Loss of face to face communication with senior management team	calling. <b>3. Loss of website communications</b> Where possible we place a notification/alert on the opening
		home page of our website and generate an announcement through the e-portfolio platform and a mailer out to all learners and their employers/mentors
		<ul> <li>4. Loss of face to face communication with senior management team</li> <li>The organisation hierarchy dictates that each role has a natural 'dotted line' to a peer and this colleague is assigned to each member of the senior team to cover for absence of any individual member.</li> </ul>

Alternative modes of transport	Firebrand Training is committed to providing frequent face-to-face support, where feasible to learners (inclusive of through remote, collaborative technologies). In the event of an incident that restricts normal transport then alternative methods are employed.	Firebrand Training staff normally travel to and from learners premises by road and their vehicle, insurance and licence details are held internally within Firebrand Training Operations. Naturally this is less so since the global pandemic. Where road travel is unavailable staff will be reliant on rail travel and claim the costs of this through the normal expense claim process. It is also feasible, dependent on the distance to travel that we will book flights for staff, mainly as a staff welfare consideration. Where no travel is possible, and as adopted throughout the Covid-19 pandemic we can facilitate interventions through collaborative technologies such as Microsoft Teams, WebEx & Zoom. Where learners are unable to travel to their place of work it is important that they notify their employer and the training provider so that all parties are aware and so that a contingency can be put in place such as remote operation from a home address or another office closer to the learners residence.
Alternative site of operations	Firebrand Training deliver the overwhelming majority of training in our immersive residential training centre at Wyboston Lakes, Bedfordshire, MK44 3AL. Whereas due to the recent pandemic a proportion of learning remains online through our OIL (Online Instructor Led) model and a hybrid offering where remote and face to face training is run concurrently. Firebrand Training remains nimble enough to flip to fully online learner at short notice.	<ul> <li>Where the residential training centre is not operational then alternative classroom(s) will be hired from the Wyboston Lakes complex, inclusive of The Willows, The Knowledge Centre and The Waterfront. Where there is a closed cohort then arrangements will be explored to move this course to the employer premises. Alternatively a training venue can be secured off-site .</li> <li>When training takes place in either case of the above Firebrand Training will ensure that these premises meet/have all insurances, health and safety, welfare and quality of delivery requirements as set out in our policies and, where appropriate, are fully compliant with ESFA requirements.</li> </ul>

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	Where an alternative site is required then this is coordinated through both the Firebrand Training COO and the Firebrand Training Business Continuity Team.	In emergencies when access to our main office of operation is not available, for example in the case of trade union action, environmental incident or failure of key utilities we will either move key staff to the Wyboston Lakes training offices (as per Firebrand Training Business Continuity Plan) and/or take a short-term lease in a managed office facility or meeting room(s) in a local hotel.
Back-up of business-critical systems	The Firebrand Service Desk team are required to prioritise their IT processes and associated assets based upon the potential detrimental impacts to the defined critical business processes. We conduct a Business Impact Analysis (BIA) to identify the critical business processes, determine standard recovery timeframes and establish the criticality ratings for each identified element at least every	<ul> <li>Should business critical systems fail we assign a member of the senior management team as Disaster Recovery Manager. They are responsible for overseeing and implementing the action plan.</li> <li>The plan contains the following elements:</li> <li>Back-up and restoration of data</li> <li>Continuation of apprenticeship training</li> <li>Continuity of apprentice evidence of learning</li> <li>Protection and retention of accredited evidence</li> </ul>
	other year.	Backup strategies will comply with ESFA and other stakeholders such as the IfATE and Ofsted predefined businesses continuity requirements, including defined recovery time and point objectives.
Back-up and restoration of data	All data regardless of whether it is electronic or manual will be backed up through the service plan with Microsoft Azure	Backup is managed real-time through Microsoft Azure and located across duplicate data centres in the UK and in Holland, which can be restored between 0-4hrs from request. Hard copy information is stored in a secure area, where possible limiting the potential for environmental, accidental or
Continuation of apprenticeship training	In the event of business failure, Firebrand Training will seek to identify an alternative training provider who can	malicious damage (e.g. fire/flood/theft). We will take steps to ensure that the quality of a stand-in provider matches Government requirements and that of the apprentices' employer.

	provide continuation of the apprenticeship programme. We will inform ESFA using the contact numbers at the end of this document.	Data will be shared with the replacement provider in line with GDPR requirements. If the apprentices are close to Gateway at the time of failure of our business, we will also inform the End Point Assessment Organisation (EPAO) and ensure that learning evidence and associated information required by the EPAO is made available to help increase each learner's chance of completing the apprenticeship to a satisfactory conclusion. We maintain a list of principal points of contact in each EPAO so that we can advise them of the number of apprentices and when they are likely to require end point assessment.
Continuity of apprentice evidence of learning	Firebrand Training is heedful of its obligation to ensure the continuity of apprentice evidence of learning and tracking of a minimum of 20% off the job provision. In the event of business failure records will be passed to the apprentices' employer and the replacement RoATP approved training provider. Learners and their in-work mentors (employer/line manager) have direct access to the learners' online portfolio through the e-portfolio platform OneFile.	All apprentice evidence should be up to date to the time of the last visit (in person or remotely) by their apprenticeship learning mentor. The business will ensure that the evidence has been referenced as the final support provided and that all documentation that supports any evidence is provided in a timely manner with the aim of ensuring that the learner's journey has minimal disruption.
Protection and retention of accredited evidence	Firebrand Training is committed to the protection and retention of accredited evidence in line with GDPR regulations. Records are generally retained for 3 years.	<ul><li>ILRs and other evidence related to the apprentice, such as awarding organisation certificates are password protected in line with the GDPR regulations.</li><li>At the end of a learning programme we retain an electronic copy of the submission to EPAO an archived version of the e-</li></ul>

Records around funding and use of public monies are retained for 7 years.	portfolio record and copies of all feedback through direct interventions and survey based interactions.
	We retain reports of progress and milestone meetings.
	Records are available electronically to inspectorate bodies when required. No hard copy learner evidence data is collected or retained.

#### Salient contact information in the event of a substantial incident Responsible Executives:

Ben Hansford, Chief Operating Officer of Firebrand Training Kiely Makepeace, Global Operations Director of Firebrand Training

Contact: 27 Old Gloucester Street, London, WC1N 3AX Telephone Contact: 0800 081 6022 Email Contact: <u>Quality@firebrandtraining.com</u>

## Our commitment and practice to inform ESFA in the event of a substantial incident

We will inform ESFA of any significant incidents by contacting ESFA business operations: help and support team through the ESFA service desk.

- ESFA Service desk contact information
- Telephone: 0370 2670001
- Email: <u>SDE.servicedesk@education.gov.uk</u>

Our ESFA regional account manager will also be notified of the person(s) responsible for seeing out any agreed actions.

### Cheryl Hall Senior Manager - FE Territorial Team, London Central Education and Skills Funding Agency Sanctuary Buildings, Great Smith Street, London SW1P 3BT Email: <u>Cheryl.Hall@education.gov.uk</u> Tel: 07775 703 261