FIREBRAND

Business Continuity Policy

June 2018

BUSINESS CONTINUITY POLICY

CONTENTS

DOCUMENT CONTROL

Date	Revision/Amendment Details & Reason	Author
22/06/2017	Launch of Plan	Gordon MacLeod
29/06/2018	Annual Review	Gordon MacLeod

LINK: Business Continuity Yammer group

BUSINESS CONTINUITY PLAN ("*PLAN*")

1. PLAN OVERVIEW

1.1 PLAN PURPOSE

To provide a flexible response so that Firebrand Training Ltd ("*The Company*") can:

- Respond to a disruptive incident (incident management)
- Maintain delivery of critical activities/services during an incident (business continuity)
- Return to 'business as usual' (resumption and recovery)

1.2 PLAN REMIT

The plan is intended is to cover the provision for all business services in scenarios where business activity is disrupted. Scenarios where the plan may be invoked include, but are not limited to:

- Sustained failure of key business systems to operate
- Inability to access, or disruption to activities at company's premises, including:
    - Head office located at 3rd Floor, 308 Regent St, London, W1B 3AT
    - Training Centre located at Wyboston Lakes, Wyboston, Beds, MK44 3AL

1.3 PLAN OWNER & STORAGE

Gordon MacLeod is this Plan's Owner and responsible for ensuring that it is maintained, exercised and updated in accordance with internal requirements for business continuity.

The plan will be stored within the *Business Continuity Process* (BCP) group within the company's Yammer Network, and source document also stored in the company's shared drive folders at *Insert link when complete*.

1.4 PLAN DISTRIBUTION

Distribution of the plan will be to individuals via access to the BCP Yammer group, with individuals added as and when relevant. At a minimum the plan is distributed and acknowledged by the following individuals, who form the Business Continuity Team (BCT), and who will ensure they have offline access to the plan in the event of systems failures.

NAME	ROLE	Mobile Phone Number
Gordon MacLeod	Finance Director/HR Manager	07974 404606
Stefano Capaldo	Managing Director	07764 200263
Robert Chapman	Commercial Director	07979 955917
Bevan Miller	Head of IT	07590 350710
Kiely Makepeace	Apprenticeship Operations Director	07855 341885

1.5 PLAN REVIEW

This Plan will be updated monthly and formally reviewed annually in July.

1.6 PLAN EXERCISE/TESTING

To ensure that the plan is valid, that it will actually work in an incident, and to ensure staff feel more prepared in the event the plan is required, a test will be performed at a minimum once per year.

A summary log of tests conducted will be recorded in Appendix I to this document, and updates to the plan communicated as a result. Full report of Plan tests will be published in the *Business Continuity Process* Yammer group.

Minor incidents or events that do not require the full implementation of the plan, but can contribute towards improvements to the plan will also be recorded.

1.7 LINKS TO OTHER PLANS/DOCUMENTS

The following documents may be relevant to the implementation of the Plan:

| Document	Description	Owner	Location
Firebrand Systems and Recovery Plan.doc	Guide to restoration and escalation of all IT systems	Bevan Miller	BCP Yammer Group/MIS sharepoint portal
WLL Business Cont. Plan	UK Training Centre Providers Business Cont. Plan	Wyboston Lakes	BCP Yammer Group
Regent_St Building _Security Escalation Lockdown Process	Advice on how London Office Management will act in event of building security threats	Regent Street Management Direct	BCP Yammer Group
Regent St Emergency Procedures Document	London Office evacuation and emergency procedures advice	Regent Street Management Direct	TBA – Property manager advises due for release July 2017

2. PLAN ACTIVATION

2.1 CIRCUMSTANCES

This Plan will be activated in response to an incident causing significant disruption to normal service delivery/business, particularly the delivery of key/critical activities. Examples of circumstances triggering activation of this Plan include:

- Loss of key staff or skills e.g. above normal levels of absenteeism due to illness
- Loss of critical systems e.g. ICT failure/Ddos attack
- Denial of access, or damage to, facilities e.g. loss of a building through fire
- Loss of a key resource e.g. a major supplier vital to the delivery of a key service

2.2 RESPONSIBILITY FOR ACTIVATION

A member of the nominated **Business Continuity Team** (see section 1.4) for the Company will normally activate and stand down this Plan. Business as usual should continue as far as possible until it has been confirmed that the plan has been activated.

2.3 PROCESS FOR ACTIVATION
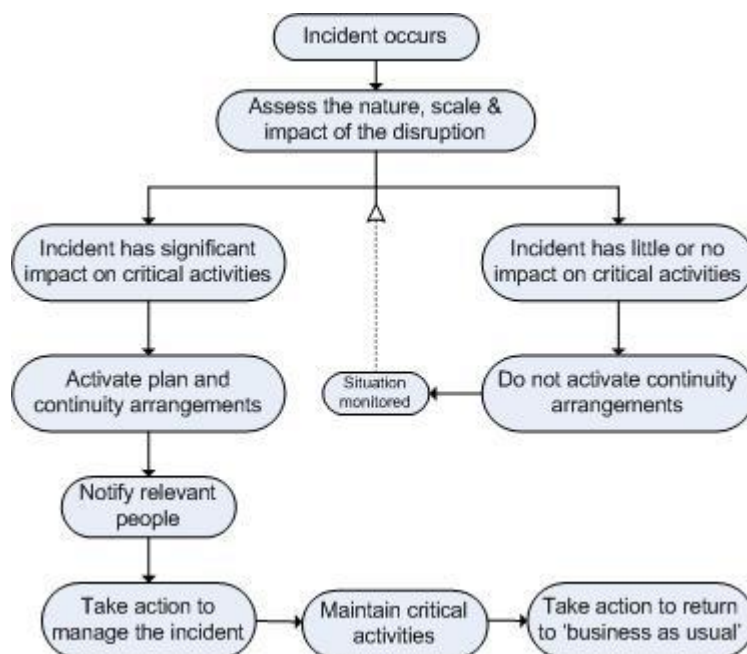
3. INCIDENT MANAGEMENT

3.1 PURPOSE OF THE INCIDENT MANAGEMENT PHASE

- Protect the safety of staff, visitors and the wider community
- Protect vital assets e.g. equipment, data, reputation etc
- Ensure necessary communication takes place
- Support the Business Continuity phase
- Support the Recovery and Resumption phase

3.2 ACTIONS TO PROTECT THE SAFETY AND WELFARE OF STAFF, VISITORS AND THE PUBLIC

The following actions will be taken to protect the immediate safety of staff, visitors and the public:

	ACTION	FUTHER INFO/DETAILS
1.	Evacuate the building if necessary	Use normal evacuation procedures for the building, liaising with building/Training Centre Management as appropriate.
2.	Ensure all staff report to the Assembly Point.	The Assembly point for the London Office is: Corner of Regent St, and Little Portland St. The Assembly Point for the training centre is: Outside Willows Centre Office/Training Centre Managers are responsible for completing this action
3.	Call emergency services (as appropriate)	TEL: 999 Office/Training Centre Managers are responsible for completing this action
4.	Check that all staff, contractors and any visitors have been evacuated from the building and are present. Consider safety of all staff, contactors and visitors as a priority	Responsible person to co-ordinate with departmental heads (London Office)/Class Instructors (training centres) to ensure all people accounted for. Office/Training Centre Managers are responsible for completing this action
5.	Ensure log of incident is started and maintained throughout the incident phase	Use a decision and action log to do this. The log template can be found as Appendix 2 to this Document, and as a stand-alone document within the BCP Yammer Group Notfication to be posted in the BCP Yammer Group as an area where information can be accessed off-premises.

	ACTION	FUTHER INFO/DETAILS
6.	Record names and details of any staff, contractors or visitors who may have been injured or distressed in the incident.	Office/Training Centre Managers is responsible for completing this action
7.	Forward details of any fatalities or injuries in the incident to HR (depending on scale of incident) and agree action that will be taken.	The HR contact to forward this information to is Gordon MacLeod & Sam Saunders. Office/Training Centre Managers is responsible for completing this action
8.	Assess impact of the incident to agree response / next steps	Designated BCT Member is responsible for completing this action
9.	Log details of all items lost by staff, visitors etc as a result of the incident	Office/Training Centre Managers are responsible for documenting this information
10.	Consider whether the involvement of other teams, services or organisations are required to support the management of the incident	Depending on the incident the following assistance may be approached to assist with incident management: • Personnel • Health and Safety • Legal • Occupational Health

3.3 COMMUNICATION ACTIONS

In the event of an incident and this plan being activated, the following groups of individuals should be contacted. Nature of contact will depend on the incident type and time it has occurred. Contact details for internal Firebrand staff are available in the Octopus HR system, which is accessible remotely.

Gordon MacLeod or Designated BCT Member is responsible for completing the communication actions.

ALWAYS CONTACTED				
	Group of Individuals	Communicated by	Contact Details	Likely message
1.	Business Continuity Team (see 1.4)	BCT Member activating BCP	See 1.4/Octopus	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Request to escalate or support
2.	Remainder of Senior Management Team (Gazelles Yammer Group)	BCT Member activating BCP	In Octopus	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Indication of likely restoration/actions they need to take, including further staff communication

	Group of Individuals	Communicated by	Contact Details	Likely message
CONTACTED DEPENDING ON INCIDENT				
1.	Middle-Line Managers (where affected)	Senior Management to Direct Reports	Held by Senior Management and available in Octopus	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Indication of likely restoration/actions they need to take, including further staff communication
2.	All Staff	From immediate line manager	Held by line manager and available in Octopus	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Where they need to report to/work from
3.	Landlords/Property Owners/Key Suppliers e.g. If Systems related incident	Senior Manager in charge of relationship	Key Contact details stored in BCP Yammer Group	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Actions Required
4.	Customers – if on site incident	Training Centre Manager	Consider appropriate methods for communicating with customers	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Expected duration of the disruption ▪ Alternative arrangements if required
5.	Customers – general communication if systems down/HQ office inaccessible	Website Announcement /automatic Phone message	Held by Marketing/MIS departments	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Expected duration of the disruption ▪ Alternative arrangements if required
6.	Insurance Company	Gordon MacLeod/Other BCT Member	Lark Insurance, main contact Lee Downs 01622 356926	▪ Incident is taking place ▪ Action being taken ▪ Impact on the service ▪ Request for support as available

3.4 ACTIONS TO SUPPORT BUSINESS CONTINUITY

	ACTION	FUTHER INFO/DETAILS
1.	Recover vital assets/equipment to enable delivery of critical activities (see section 4.1 for details of critical acitivities)	The essential equipment/resources/information that need to be recovered where possible include: Laptops for remote users; Contact Devices; Bank authorisation devices.
2.	Assess the key priorities for the remainder of the working day and take relevant action	Consider sending staff home, to recovery site etc. Assess capacity at alternative sites.
3.	Inform staff what is required of them	Ensure communication is concise and consistent.
4.	Publicise the interim arrangements for delivery of critical activities	Ensure all stakeholders are kept informed of contingency arrangements as appropriate Key information to be publicised into relevant groups in Yammer – remotely accessible.

3.5 ACTIONS TO SUPPORT RECOVERY AND RESUMPTION

	ACTION	FUTHER INFO/DETAILS
1.	Take any salvage/asset recovery actions that are appropriate	Remove any equipment, furniture, records etc that are at risk of damage.
2.	Continue to log all expenditure incurred as a result of the incident	Use a financial expenditure log to record costs incurred as a result of responding to the incident
3.	Seek specific advice from your Insurance Company	
4.	Consult with property providers regarding potential interim alternative arrangements	

3.6 COMMUNICATING WITH STAFF

Communication to staff should in the first instance be verbal wherever possible, supported by communication in Yammer which is accessible remotely. Staff contact details are stored in the Octopus HR system which is accessible remotely. Senior Managers are responsible for communicating with their direct reports, who should in turn contact any team members of their own. Managers with large teams may choose to delegate responsibility within those teams, but retain overall responsibility for ensuring team members have been contacted.

4. BUSINESS CONTINUITY

4.1 PURPOSE OF THE BUSINESS CONTINUITY PHASE

The purpose of the business continuity phase of response is to ensure that critical activities are resumed as quickly as possible and/or continue to be delivered during the disruption.

The Business Continuity Team[1] is responsible for identifying and maintaining details of critical activities and the resources required to deliver them both in 'business as usual' and in crisis situations. The Business Continuity Team[2] will regularly review the list of critical and non-critical activities to help inform the business continuity response that is required.

4.2.1 CRITICAL ACTIVITIES

The following have been identified as critical activities:

	Brief Description of Critical Activities
1.	Training Delivery continuation
2.	Functioning Website to receive inbound leads
3.	Access to CRM systems and ability via Telephone system for staff to communicate with customers
4.	Ability to access banking systems to make and receive payments as required
5.	Yammer access to enable communication

4.2.2 NON-CRITICAL ACTIVITIES

A number of activities are non critical and consideration will be given to:
- Not recovering these activities until critical activities have been resumed
- Suspending these activities and diverting their resources to support the critical ones

The non-critical activities for the company are:

	Brief Description of Non-Critical Activities
1.	Access to all other business systems
2.	Physical Property access (assuming remote access possible)

4.3 BUSINESS CONTINUITY ACTIONS

The Business Continuity Team (See Section 2) for the incident is responsible for ensuring the following actions are completed:

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[1] See Section 2 of this Plan for information on the Business Continuity Team
[2] See Section 2 of this Plan for information on the Business Continuity Team

	ACTION	FUTHER INFO/DETAILS
1.	Identify any other staff required to be involved in the BC response	Depending on the incident, the Business Continuity Team may need additional/specific input in order to drive the recovery of critical activities
2.	Evaluate the impact of the incident	Use an incident impact assessment form to understand the impact of the incident on 'business as usual' working activities.
3.	Plan how critical activities will be maintained.	Consider: ▪ Immediate priorities ▪ Communication strategies ▪ Deployment of resources ▪ Finance ▪ Monitoring the situation ▪ Reporting ▪ Business Partner Responses
4.	Log **all** decisions and actions, including what you decide **not** to do and include rationale	Use a decision and action log to do this
5.	Log **all** financial expenditure incurred	Use a financial expenditure log to do this. Finance department to allocate code for incident to enable maintenance of all related expenditure against cost code.
6.	Allocate specific roles as necessary	Roles allocated will depend on the incident and availability of staff
7.	Secure resources to enable critical activities to continue/be recovered	Consider requirements such as the staffing, premises, equipment.
8.	Deliver appropriate communication actions as required	Ensure methods of communication and key messages are developed as appropriate to the needs of your key stakeholders e.g. customers, suppliers, staff, Executive Boards, Shareholders etc.

5. RECOVERY & RESUMPTION

5.1   PURPOSE OF THE RECOVERY AND RESUMPTION PHASE

The purpose of the recovery and resumption phase is to resume normal working practises for the Company. Where the impact of the incident is prolonged, normal operations may need to be delivered under new circumstances e.g. from a different building.

5.2   RECOVERY AND RESUMPTION ACTIONS

	ACTION	FUTHER INFO/DETAILS
1.	Agree and plan the actions required to enable recovery and resumption of normal working practises	Agreed actions will be detailed in an action plan and set against timescales with responsibility for completion clearly indicated.
2.	Continue to log all expenditure incurred as a result of the incident	Use a financial expenditure log to do this
3.	Respond to any long terms support needs of staff	Depending on the nature of the incident, the Business Continuity Team may need to consider the use of Counselling Services e.g. internal Occupational Health involvement or appropriate External Agencies
4.	Carry out a 'debrief' of the incident and complete an Incident Report to document opportunities for improvement and any lessons identified	Use an Incident Report Form to do this. This should be reviewed by all members of the Business Continuity Team to ensure key actions resulting from the incident are implemented within designated timescales
5.	Review this Continuity Plan in light of lessons learned from incident and the response to it	Implement recommendations for improvement and update this Plan. Ensure a revised version of the Plan is read by all members of the Business Continuity Team
6.	Publicise that there is now 'business as usual'	Publish on Yammer and via individual office/team meetings as appropriate

APPENDIX I: PLAN IMPLEMENTATION CONTROL LOG

Date	Activity Type (Test/Incident)	Scenario Tested	Staff involved	Summary of Test Success	Improvements Required
Example	*Test*	*London Office inaccessible – staff to work from Wyboston*	*4 x Sales, 1 x CS, 1 x Finance*	*Well executed, no major issues reported, all able to work with minimum disruption*	*Quicker response/availability of solutions at training centre*

APPENDIX 2: INCIDENT CONTROL LOG TEMPLATE

INCIDENT OVERVIEW

Date:	
Location:	
Summary of Incident:	

DECISIONS & ACTIONS LOG

Decision/Action	Date/Time	Assigned to:	Completed on:	Further Comments

Authorisation & Document Control

Document Title	Business Continuity Plan			Status	V.1
Classification	External	**Last Review**	June 2017	**Next Review**	June 2018
Location	S:\Apprenticeship\Quality\Policies & Procedures\2017				

Authorisation	Responsible Person or Body
Document Owner	Gordon MacLeod
Authorised By	Stefano Capaldo

Version History

Version	Author	Issued	Summary of Changes
Draft	Gordon MacLeod	May 2017	Rewrite to replace previous version
V.1	Gordon MacLeod	June 2017	Approved and version control updated – Issued
V.1.1	Gordon MacLeod	June 2018	Annual Review – no changes