



Continuity of Apprenticeships

V1.1

Updated August 2021

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PURPOSE AND SCOPE

The scope of this policy is to consider those incidents that will have a significant impact on the operation of Accipio and our ability to deliver apprenticeships, following a major crisis or disaster or an event which creates the need for a short-term organisational closure or a loss of data.

It presents an action plan that shall be implemented to deal with the immediate response to, and the post-management of a major incident, short-term closure or loss of data. It determines the roles and responsibilities of the individual's nominated.

Staff are asked to ensure that they read and understand the contents of this plan and to ensure that they remain aware of its contents in order to act accordingly should disaster, a major incident or loss of data strike the organisation.

OBJECTIVES

The two main objectives of this continuity plan are:

1. To avert, or to minimise the effects of a disaster;
2. To bring the provision back into full operation with minimum disruption.

Included in this plan are details of how Accipio will, in the event of a major incident, manage;

- Alternative communication channels
- Alternative modes of transport
- Alternative site of operations
- Back-up of business-critical systems
- Back-up and restore of data
- Emergency contacts in the event of a significant incident

APPRENTICESHIP CONTINUITY TEAM (ACT)

The Apprenticeship Continuity Team (ACT) have ultimate responsibility for the development, implementation and monitoring of the continuity plan. Core responsibilities are defined.

MANAGEMENT OF AN INCIDENT

In the event of a disaster which affects the continuity of apprenticeships, the Director will become the Team Leader of the ACT and will involve all those members of the ACT, as are necessary to deal with the crisis and aftermath of the serious incident, data loss or other cause.

IMPLEMENTATION

As soon as possible after a major incident the Director will assess the situation to determine if the Continuity Plan for apprenticeships needs to be put into effect.

If the Director is no longer able to undertake the duties of the post, or is unavailable at the time of the incident, the Head of Apprenticeships will deputise as the Team Leader until such time as the Director returns or the organisation appoints a successor.

If the Head of Apprenticeships is unable to undertake these duties, then team leadership will pass in turn to the Head of HR until the Director or 'deputy' are able to resume overall responsibility for the continuity of apprenticeships.

EFFECTS OF A MAJOR INCIDENT

- The inability of the provider to meet its contractual obligations to deliver its teaching programme to apprentices and all learners
- Prosecution and litigation
- Adverse publicity

TYPES OF MAJOR INCIDENT

Large scale incidents that should be considered significant and which will affect the continuity of apprenticeships training:

- Loss of key staff
- Fire
- Flood
- Explosion
- Serious adverse weather condition
- Vandalism
- Sabotage
- Theft
- Loss of confidential information
- Data protection issues
- Loss of IT / Management Information Systems
- Extortion
- Serious accident
- Serious assault
- Armed or dangerous intruder
- Bomb threat
- Pandemic
- Notifiable disease

In some instances, these incidents can be due to natural cause's e.g. severe weather, while in other cases, equipment failure, progressive deterioration or human error or involvement may be the cause. They have the potential to lead to the following issues which are likely to have a major impact on the operation of the provider:

Loss of:

- Control
- Expertise
- Buildings
- Equipment
- Facilities
- Data
- Personnel
- Reputation
- Funding

CRITICAL LOSSES

Some departments and facilities are considered to be crucial to the functioning of Accipio's apprenticeship provision in either the short or long time. They include:

Critical Buildings / Facilities	Critical Losses
Essential Building Services (Gas, Water, Electricity)	Power, lighting, heating, hot water Security systems and fire alarm systems Communications
FORA 71 Central Street EC1V 8AB	HR/Staff records Learner Records (physical) Information and Data Systems Examination papers and storage Funding and Finance records
IT rooms and servers	Communication systems

In some instances, the loss of individual rooms or services may not in itself be crucial, however, the loss of a number of similar facilities may constitute a crisis.

RISK ASSESSMENT

In order to minimise the possibility of a major incident occurring, the ACT shall ensure as far as is reasonably practicable, that any perceived risks have been determined, assessed and recorded.

RECOVERY TEAMS

Overall responsibility for Business Continuity Management of Accipio is with the Director (**Sascha Benson-Cooper**), the responsibility of the continuity of apprenticeship training is delegated to the Director also. The Deputy in this instance would be the Head of Apprenticeships (**Graham McMullan**).

Departmental/Process Responsibility

Leadership	Name: Graham McMullan Deputy: Sean Lea
IT	Name: Edward McLaughlin Deputy: Sean Lea
Finance	Name: Sascha Benson-Cooper Deputy: Graham McMullan
HR Internal	Name: Sascha Benson-Cooper Deputy: Sean Lèa
Media/Communications	Name: Sascha Benson-Cooper Deputy: Graham McMullan
Training	Name: Graham McMullan Deputy: Sean Lea

Management of Short-Term Provider Closure

Accipio's apprenticeship provision may be disrupted to events outside of its control which will necessitate closure for part of a day or more. Such events include:

- Power failure
- Water failure
- Failure of heating services
- Severe snow or other hazardous weather conditions
- Serious security risk

Information to staff and apprentices regarding the current situation will be relayed via an email being sent to all staff as soon as possible to inform them of the incident and the next steps that should be taken.

During this time, most staff will be sent home or requested to stay home until further notice. However, it may be necessary to call on a number of key staff, and/or other members of the ACT to remain at or attend the provider to help oversee the remedial action and to maintain essential services as determined at the time.

Key staff required to attend (if reasonably practicable) under such circumstances may include members of the following departments, though this list is not exhaustive and particular arrangements will be made on the day or as conditions dictate.

- Members of the ACT
- IT/MIS staff
- HR & Finance
- Central administration

THE ROLE OF THE APPRENTICESHIP CONTINUITY TEAM

To manage an incident by:

- Implementing alternative strategic arrangements contained within Departmental Emergency/Disaster Recovery Plans or within our health and Safety Policies
- Ensuring statutory compliance with regard to RIDDOR
- Ensuring adequate recourses are available to implement emergency plans
- Informing where applicable
 - Board of directors
 - Parents or next of kin
 - Insurance companies
 - Education and Skills Funding Agency
 - Ofsted
 - Media
 - Police
- Coordinating and supporting travel arrangements
- Enlisting the help of trained counsellors for stress or bereavement support
- Instructing lawyers
- Maintaining adequate records

SPECIFIC RESPONSIBILITIES OF THE APPRENTICESHIP CONTINUITY TEAM

Each role identified below will designate a deputy and each role will all team members should keep this plan for reference at home in case of a business disruption that happens after normal work hours.



Director/CEO

- To oversee and facilitate action plan
- To disseminate information to relevant bodies, including the ESFA
- To inform the training board and keep informed
- To set up emergency budgets and monitor spending

Head of Apprenticeships

- To assist with the recovery process by assuming specific delegated tasks as determined by the Director
- To prevent unauthorised access to areas of danger
- To liaise with emergency services
- To procure temporary buildings and services
- To activate call-divert on the provider incoming telephone number

Marketing Team/Director

- To disseminate information via the media
- To relay written communication regarding the current issue to the website and other social media platforms.

Head of HR

- To liaise with all staff as required

RESPONDING TO A CRISIS

Regardless of the disruption circumstances, or the identity of the person(s) first made aware of the interruption, the Director must be notified immediately in the following cases:

- Two or more systems and/or sites are down concurrently for three (3) or more hours.
- Any problem involving a voice/data/Internet/wireless network facility that would cause either of the above conditions to be present or there is certain indication that either of the conditions is about to occur.

Notification of incident affecting Accipio sites

If in-hours:

Upon observation or notification of a serious or potentially serious issue or network disruption at an Accipio location, ensure that personnel on site have enacted standard emergency and evacuation procedures if appropriate, and notify the Director.

If out of hours:

If the crisis concerns security of the provider, the call is likely to be taken by the Director via the Fora Space alerts and emergency contacts in the event of an emergency or the Police. The Director immediately, will begin any implementation of the continuity plan.

In both cases, in and out of hours, if any of the following conditions exist;

- Network performance has sufficiently degraded to where normal operations are not possible for three or more hours
- Any problem at any network infrastructure asset, system or location that would cause the above condition to be present or there is certain indication that the above condition is about to occur.

The person reporting the incident will provide the following information to the Director immediately.

- Type of incident (e.g., Hardware failure, fire, hurricane, flood).
- Summarise the damage (e.g., minimal, heavy, total destruction).
- Meeting location that is a safe distance from the disaster scene.

IMPLEMENTING THE CONTINUITY PLAN

Evacuation & Emergency Action

The procedures for safe evacuation of the premises and the alerting of the emergency services are as set out in the Health and Safety Policy available on the Staff Shared Area.

Immediate security of buildings and salvage arrangements

The Head of Apprenticeships will arrange for the immediate security of the damaged areas, including arranging for temporary cover of exposed areas and storage of furniture, equipment etc. The Head of Apprenticeships will also supervise all salvage and recovery work, bringing in specialist firms where necessary e.g. salvage of books, electrical and electronic equipment etc.

Suppliers and Contractors

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The Head of Apprenticeships is required to keep a list of suppliers who may make deliveries to or who service the provider so that they may be contacted to advise their staff to suspend or redirect delivery of supplies if necessary. The finance department maintains a list of Specialist Authorised Contractors who may be called upon to assist with refurbishment or emergency repairs

Insurance

The Director shall notify the insurance company as soon as possible after the incident (and normally before any salvage work has begun)

Telephones

To arrange alternative communications, an email is to be sent to sascha@accipio.com followed by a telephone call explaining that there has been a power outage or flood etc. and ask for a divert. The Director may authorise the temporary hire of mobile phones for essential staff in addition to those already held by staff members, where applicable. The Head of Digital (Edward McLaughlin) should be contacted immediately so that he may contact the Supply Company to reinstate the system as quickly as possible or install additional lines.

Key Contact Lists

The Deputy TL shall keep up-to-date contact lists (work & home phone numbers and addresses of individuals and next of kin) of all training staff and will also be able to access apprenticeship records in case of an emergency.

Contact arrangements and emergency numbers

If the provider is closed with no immediate alternative accommodation available, then the staff and any apprentices affected shall be advised to stay at home. Staff and apprentices are expected to seek regular information bulletins regarding the immediate situation by visiting the website and accessing social media sites, they are also encouraged to check text messages and emails for updated information. Apprentices should also contact their dedicated tutor or internal quality assurer.

Internal Communications

The Director will be responsible for the format and content of all internal communications to apprentices and training staff concerning the incident and its aftermath. Members of staff deputised to give out information will be well briefed, with a written statement provided to them by the Director available for reference.

A meeting of all staff should be arranged if possible, on the same day to give information on the incident and apprentices briefed by their respective skills coach, if appropriate. Questions should be answered as straightforwardly as possible.

Only the facts should be presented, without speculation on the causes or consequences of the incident; in particular no blame should be attributed. If questions arise to which there are as yet no answers, this should be acknowledged honestly.

Regular bulletins should be issued, including up-to-date information on the location and contact numbers of all displaced staff and alternative training and work accommodation.

External Publicity

The Director and the Head of Apprenticeships are the only nominated persons for media liaison. On no account shall any other member of staff contact the media without authorisation.

Alternative Accommodation

There will be a team setup to collate and gather information on any accommodation that is required.

Office Re-scheduling

Where possible, alternative office space will be allocated to staff on the basis of priorities agreed by the Director.

Coursework, Resources, Portfolio & Examinations

Accipio is required to keep copies of all essential coursework and examinations, where not online, in a fireproof safe, or a second (electronic) copy off site, to ensure that no essential information is lost in the event of a disaster.

The Head of Apprenticeships and the Director will meet as soon as possible to consider the effect of the disaster on Apprenticeship portfolios and examination entry. We will liaise with and be advised by the Awarding Bodies.

Apprentices will be offered individual advice sessions with a member of staff to discuss their concerns about the effects of the disaster on their work and any extra measures

(advised by the Awarding Bodies) which are required to enable them to complete the course successfully.

Examinations may be moved to a remote invigilated option if this is possible to do so and to minimise the impact of the disaster or crisis on the apprentice and their progress.

To ensure the continuity of learning for our apprentices, our platforms are backed along with all of the relevant data and resources to a secondary off-site location, ensuring the continuity of portfolio, learning and resource access. Communications will be sent out to inform staff and learners that portfolio systems are running as normal (once the second backup is completed, if needed).

Provided that the IT network system is fully functional and internet access is not disrupted, staff will be able to access all systems remotely.

Temporary Staff

If temporary staff are required, the Director will make arrangements with necessary recruitment agencies.

Extra Travel Costs

If apprentices have to pay extra travel costs to attend another site, then arrangements will be made to provide assistance with these costs. We will calculate the additional cost involved and will make arrangements to make payments to the apprentice,

Budget

An emergency budget will be available to cover additional costs associated with the emergency. The Director will have full control and discretion to use this budget. The Director is responsible for making any necessary arrangements for bank overdraft or loan, pending settlement of insurance claims.

Monitoring

Staff will receive advice on how to look for signs that the distress caused by the incident is having a continuing effect on a member of staff or an apprentices' performance. Staff and apprentices should be asked to keep alert to differences in behaviour in one another and signal if they have any concerns that an individual may be suffering from stress related to an event.

Record Keeping

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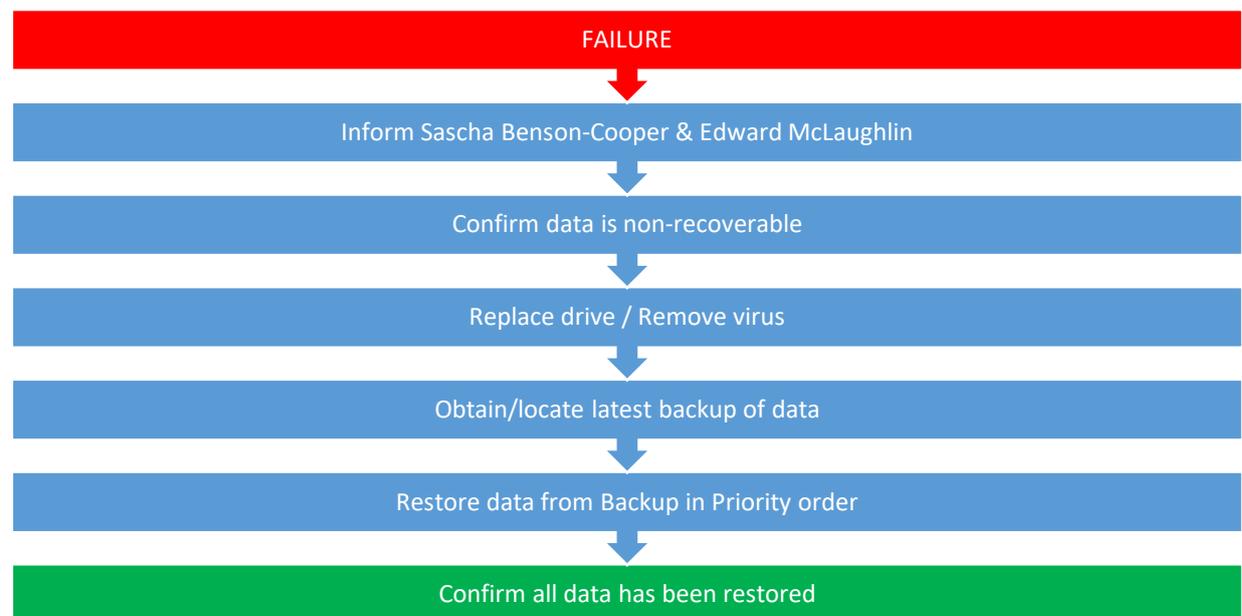
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The Director shall ensure that an accurate written record of events is compiled for future reference. Each member of the ACT should be encouraged to keep a diary during the crisis that notes specific times that actions were instigated and completed. Diaries can then be used during team meetings to confirm specific action or instruction and help to provide crucial information for the final report.

SPECIFIC ACTION PLANS

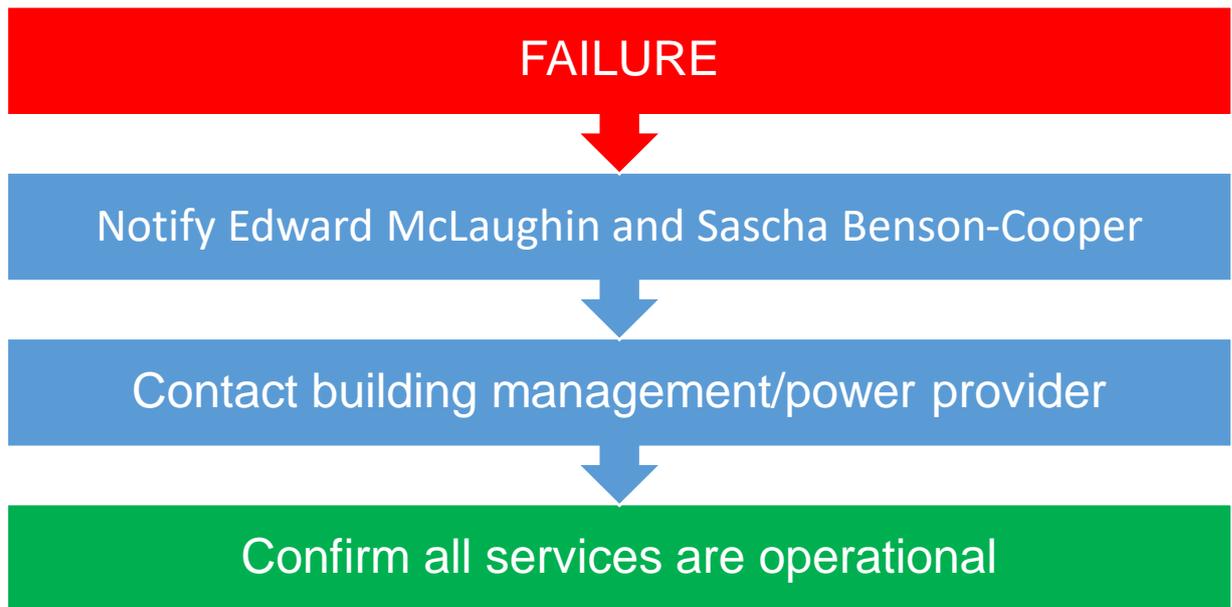
Hardware failure and Cyber Attack



Existing Control Measures

All servers are kept in the cloud, any local machine hardware failure can be solved through backup computers kept by Sascha. Wordpress sites are configured with Wordfence WAF. AWS accounts use authy MFA for root login. All instances are configured with cryptographic keys. Access control policy in place. Only master users are given access to these cryptographic keys, all other access is restricted and is through SFTP. Instances are maintained to recent versions of software to reduce risk of malicious entry.

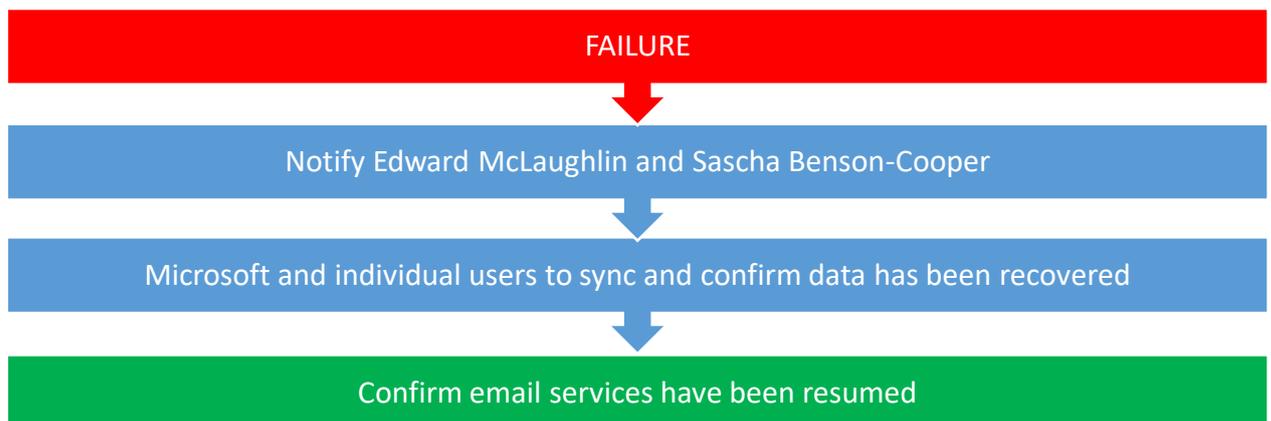
Failure of Power



Existing Control Measures:

Existing control measures should there be power failure. All staff who are required to work in the event of an emergency power failure will be relocated to Fora Dallington Street, where normal business operations can commence.

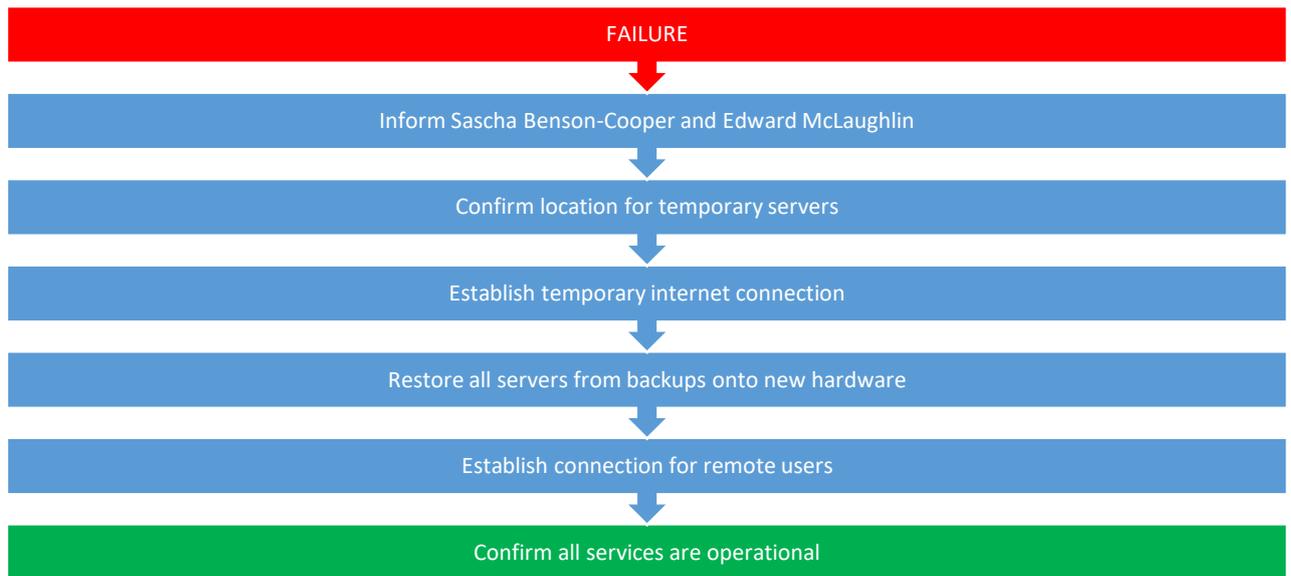
Email Recovery



Existing Control Measures:

Email is provided by Microsoft Exchange and they have various disaster recovery plans in place. Archives are stored locally on people’s computers.

Complete Server Failure / Damage Recovery (Accipio Servers are cloud based)



Existing Control Measures;

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Fire Premises Damage

In the event of a fire:

If fire or smoke is present in the facility, evaluate the situation and determine the severity, categorise the fire as a major or minor incident and take the appropriate action as defined in this section.

Call 999 or contact your local first responders as soon as possible if the situation warrants it.

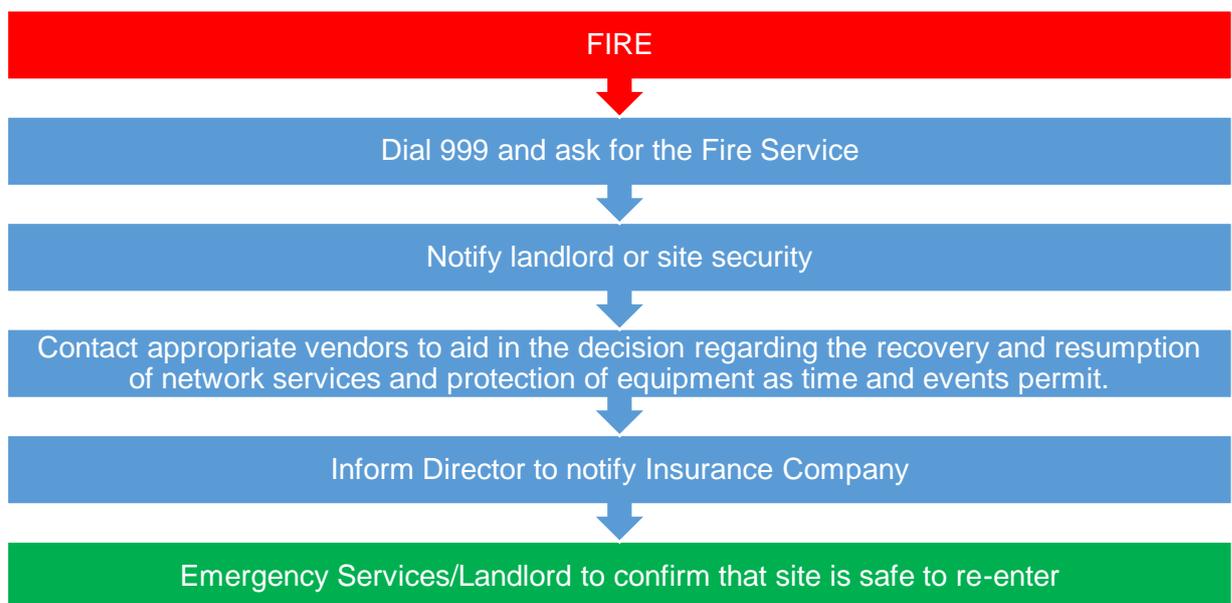
- Personnel are to attempt to extinguish minor fires (e.g., single hardware component or paper fires) using hand-held fire extinguishers located throughout the facility. Any other fire or smoke situation will be handled by qualified building personnel until the local fire department arrives.

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- In the event of a major fire, call 999 and immediately evacuate the area.
- In the event of any emergency situation, such as system and network security, site security and personal safety are the major concerns. If possible, the lead network administrator and/or designee (Fora) should remain present at the facility until the fire department has arrived.



Existing Control Measures:

Periodically there are fire alarm tests and evacuation drills. There is a working fire alarm, and this is tested. Staff are aware of the meeting point should there be a fire.

Terrorist and Bomb Threat

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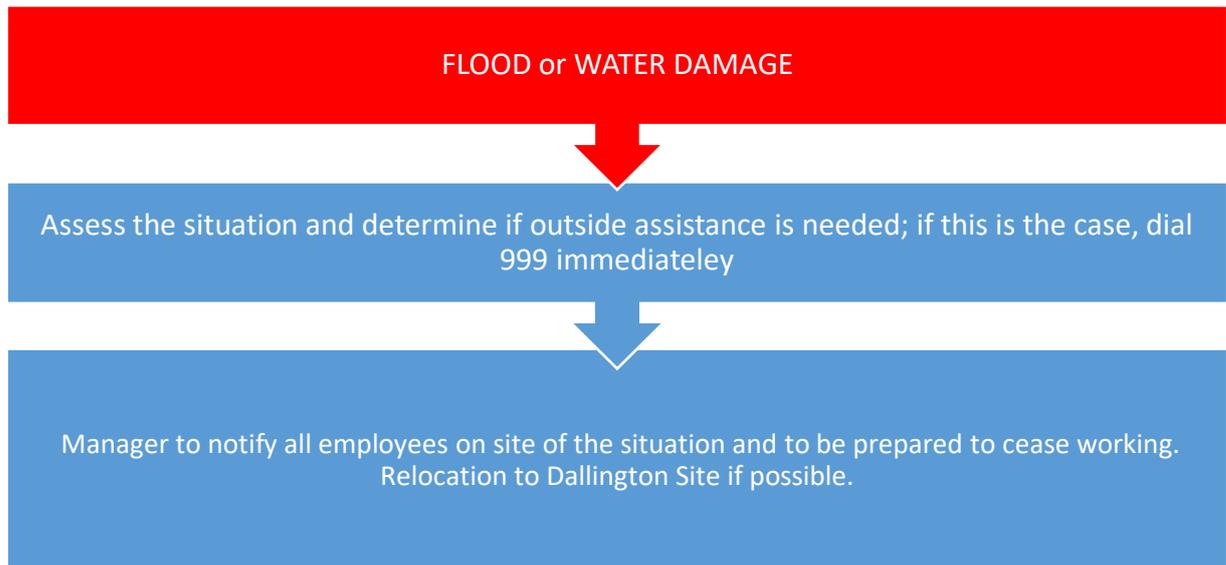


Flood or Water Damage

In the event of a flood or broken water pipe near any network infrastructure location, the guidelines and procedures in this section are to be followed.

Water detected below raised floor may have different causes:

- If water is slowly dripping from an air conditioning unit and not endangering equipment, contact repair personnel immediately.
- If water is of a major quantity and flooding beneath the floor (water main break), immediately implement power-down procedures. While power-down procedures are in progress, evacuate the area and follow management's instructions.



KEY PERSONELL

Out of Hours Contacts

First Name	Surname	Mobile No	Role
Sascha	Benson-Cooper	07881463405	Director/CEO
Graham	McMullan	07809573799	Head of Apprenticeships
Edward	McLaughlin	07460850764	Head of Digital
Sean	Lea	07814518035	Head of HR

Accipio Insurance Providers

Insurance Broker: Hiscox

Certificate Number: HU PI6 1894469 (104)

1 Great St Helen's

London

EC3A 6HX

Telephone number:

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1st Contact: _____ **01206 773 899_**

FORA Contacts

Contact guest experience hosts or manager at reception.

ESFA Contact

Contact local territory manager to inform.

The Contact Centre number is **0370 2670001**. This service is open from 9am Monday to Friday and closes at 5pm except Friday's when they close at 4pm.

BUSINESS IMPACT ANALYSIS

Likelihood		X	Severity		=	
Risk Rating						
Not Likely	1	X	No Impact on Business		1 =	
Likely	2	X	Minor Impact		2 =	
Very Likely	3	X	Major Impact		3 =	
Risk Rating	=	1	-	2	=	Low
Priority		3	-	5	=	Medium
Priority		6	-	9	=	High

<u>Event</u>	<u>Likelihood</u>	X	<u>Severity</u>	=	<u>Risk</u>
Fire Premises Damage	1	x	3	=	3
Cyber Attack	3	x	3	=	9
Flood or Water Damage	1	x	3	=	3
Hardware Failure	2	x	3	=	6
Loss of key person	1	x	3	=	3
Failure of Electricity, gas or water	1	x	2	=	2

Terrorist and Bomb threat 1 x 3 = 3

Influenza or Outbreak of similar illness 3 x 3 = 9