Business Continuity Policy

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D1	-	VP Corporate Services and Planning/ Head of Health, Safety & Sustainability	Initial Draft
D2	19.10.23	VP Corporate Services and Planning/ Head of Health, Safety & Sustainability	Review comments
1.0	23.11.23	VP Corporate Services and Planning/ Head of Health, Safety & Sustainability	Issue
1.1	29.01.24	VP Corporate Services and Planning/ Head of Health, Safety & Sustainability	Corporate identity update and inclusion stakeholder feedback.
1.2	18.9.24	VP Corporate Services and Planning/ Head of Health, Safety & Sustainability	Corporate identity update and inclusion stakeholder feedback.
1.3	26.3.25	Chief Finance and Operations Officer/ Head of Health, Safety & Sustainability	Corporate identity and stakeholder update

Author:	Chief Finance and Operations Officer/Head of Health, Safety & Sustainability
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Contents

1   Introduction

Trafford & Stockport College Group (TSCG) is firmly committed to ensuring operational resilience. As part of this commitment, it has implemented a Business Continuity Management System (BCMS) aligned with best practices.
The Business Continuity Policy outlines the organisation's operational context, identifies crucial internal and external factors, and offers a robust framework for mitigating and managing business interruptions. It is a comprehensive guide for maintaining, monitoring, and continually improving business continuity at TSCG.

1.1   Organisation Overview

TSCG was formed through the mergers between Stockport College, Trafford College, and most recently, Cheadle and Marple 6th Form College; TSCG operates across five main campus sites in Stockport and Trafford. TSCG is serving around 11,000 students. Offerings range from adult education to apprenticeships, Higher Education, and specialised courses for young people.
TSCG's overarching purpose is "Unlocking Potential, Fostering Success." TSCG's vision is to be a leading education and skills provider, supporting community cohesion and driving local and regional productivity.
Six strategic priorities underpin TSCG's mission:

1. Providing a curriculum that delivers the skills our economy needs – locally, regionally and nationally.
2. Positioning TSCG as the employer of choice for the further education workforce.
3. Delivering an exceptional student experience.
4. Ensuring financial stability and sustainability.
5. Driving innovation in technology, facilities and skills delivery.
6. Providing civic leadership to positively influence our communities

These are enabled by transforming the estate, implementing an effective digital strategy, and ensuring financial health.

Activities encompass the range of educational programs, extracurriculars, and community engagement projects TSCG undertake. TSCG offers academic services, vocational training, career counselling, and support services like healthcare and accommodations. Full details of activities and services are carried on the website: https://trafford.tscg.ac.uk/

TSCG partners with other educational institutes, local businesses, and government agencies for student placement, research, and community services.

TSCG maintains supply chains for consumables, technology, facilities, catering, and partnerships with organisations directly providing campus services.

1.2   External/Internal Issues

External and internal issues are factored into the TSCG Business Continuity Policy and its operation. Via the Risk Management process.

1.3   Stakeholders and Interested Parties

Stakeholders and their requirements are identified at TSCG. See APPENDIX A – TSCG Stakeholders

1.4   Potential Impact of a Disruptive Incident

The potential impacts/considerations arising because of a disruptive incident are:

Impact Area	Impact
Educational Delivery	Interruption in curriculum distribution, assessment, and student evaluations.
Reputation	Erosion of public trust, negative perception, and potential decline in student enrolments.
Legal Obligations	Possible legal ramifications due to non-compliance with educational standards and regulations.
Contractual Obligations	Potential breach of contracts with suppliers, partners, and stakeholders.
Community Engagement	Impact on community services, partnerships, and engagement initiatives.
Employee Well-being	Staff safety, job security, and working conditions are affected, potentially leading to a decline in morale.

1.5   Legal and Regulatory Requirements

Legal and regulatory requirements are identified for TSCG; see APPENDIX B – Legal and Regulatory Requirements.

1.6   Scope of the BCMS

The scope of the Business Continuity Management System (BCMS) includes all aspects of TSCG operations, encompassing all campuses, educational services, and administrative functions. All TSCG employees and those working under contract to TSCG, including critical outsourced services, must comply with the Policy.

This BCMS does not directly encompass the business continuity practices or plans of third-party organisations or entities that TSCG may interact with or rely upon. However, TSCG expects these third parties to align with TSCG's business continuity expectations, as outlined in relevant agreements or contracts. Similarly, while the BCMS may not directly include the business continuity measures of critical outsourced service providers, TSCG expects these providers to have their own business continuity plans and practices in place, as specified in their respective agreements with TSCG.

1.7 Business Continuity Strategic Objectives

TSCG is committed to achieving the following overarching objectives.

Objective	How Achieved
Operational Resilience & Stakeholder Protection	Ensure continuity of operations while prioritising safety by addressing potential threats, disruptions, and critical activity protection.
Compliance & Regulation	Comply with regulations and review policies regularly, particularly regarding education and safety standards.
Continuous Improvement & Proactive Risk Management	Review and update business continuity plans regularly based on changing needs, risks, and feedback. Adopt proactive strategies and update per health, tech, and economic changes.

Through our management review process, we identify and manage operational objectives and plans that align with these overarching objectives. This ensures that our day-to-day activities and strategies harmonise with our broader goals, promoting effective business continuity management.

2 Leadership, Roles and Responsibilities

2.1 Roles and Responsibilities

Board of Corporation: The Board of Corporation approves and reviews the Business Continuity Policy annually. The Chief Executive is accountable to the Board for all matters related to Business Continuity.

Business Continuity Director (BCD): The Chief Finance and Operations Officer is the Business Continuity Director (BCD). The BCD is the primary focal point for business continuity within TSCG and appoints a Business Continuity Coordinator (BCC), Deputy, and the Business Continuity Team (BCT). The BCD or deputy is authorised to invoke business continuity and IT disaster recovery procedures.

Employees: All employees are accountable for ensuring awareness and compliance with business continuity requirements.

Leadership Team/Heads of Department: Members of the leadership team and heads of service are responsible for ensuring business continuity action cards are developed and updated for their areas of activity.

2.2 Policy

TSCG's Business Continuity Policy commits to maintaining operations within identified recovery timescales while safeguarding the safety of its people. This policy identifies and manages threats, reduces the risk of disruptions, and ensures the timely recovery of vital activities.

The Business Continuity Framework is a set of policies and procedures that helps the organisation prepare for and respond to potential disruptions. It includes a policy that sets business continuity objectives and is reviewed periodically to ensure effectiveness. The policy is aligned with the organisation's strategic goals and objectives and is communicated within the organisation.

See APPENDIX C - BC Policy Statement.

2.3 Business Continuity Roles, Responsibilities, and Authorities

The following roles and responsibilities are identified:

Role	Responsibilities
Board of Corporation	Ensure approval and annual review of the Business Continuity Policy and provide governance and oversight for the BCMS.
Chief Executive	Provide oversight and governance for the Business Continuity Management System (BCMS); be accountable to the Board for all BCMS matters.
Business Continuity Director (BCD)	Serve as the primary focal point for business continuity within TSCG. Appoint the BCC, Deputy, and BCT. Authorise the invocation of BC procedures.
Business Continuity Coordinator (BCC)	Develop the BCP per TSCG's needs. Oversee the BCP implementation and adoption. Direct functional leads in BIAs and BC action card completion.
Chief Finance and Operations Officer	Manage financial aspects of BC. Oversee BIA with functional leads. Direct risk assessment and collaborate on risk mitigation and continuity recovery strategies.
Chief People Officer	Manage people aspects of BC. Oversee People and HR elements of BIA with functional leads.
Chief Technology Officer	Oversee IT disaster recovery plan and Information Security Incident Response.
Leadership Team/Heads of Department	Develop, complete, and update BIAs and BC action cards for their respective areas.
Employees	Ensure BC awareness and compliance. Participate in training. Assist in BC measures implementation.
Business Continuity Team (BCT)	Assist with implementation activities and disruptive incident response. Ensure continuous coverage of duties by appointing deputies.
Director of ICT	Develop and implement the IT disaster recovery plan/ Information Security Incident Response. Ensure restoration of critical IT functions within required recovery timescales.
Communication	Oversee communication-related functions.
Information Technology	Manage IT-related aspects of business continuity.

Role	Responsibilities
HR	Manage HR-related components.
Payroll	Oversee payment-related aspects.
MIS	Responsible for Management Information Systems.
Student Experience and Support	Responsible for student service-related matters.

2.4   Incident Response Structure

Gold Response (Strategic Level):

Composition:
- Chief Executive
- Group Principal
- Business Continuity Director (BCD) – Chief Finance and Operations Officer

Role: Oversee the entire incident management process, make strategic decisions, allocate necessary resources, and liaise with external stakeholders if required.

Silver Response (Tactical Level):

Composition:
- Business Continuity Director (BCD) - Chief Finance and Operations Officer
- Business Continuity Coordinator (BCC) - Head of Health, Safety & Sustainability
- Group Principal
- Chief Finance and Operations Officer
- Chief People Officer
- Chief Technology Officer
- Chief Commercial Officer
- Director of Estates
- Director of IT & Digital Services
- Head of Marketing and Communications
- Director of HR and Performance
- Assistant Principal Planning, Funding, and Performance
- Assistant Principal of Student Support, Safeguarding & Inclusion

Role: As the primary or initial point of contact, the Silver Response team manages the overall situation, liaises with the Gold team for strategic guidance and decisions, and coordinates with the Bronze team for ground-level execution.

Bronze Response (Operational Level):

Composition:
- Operational teams, including members of the Business Continuity Team (BCT) and relevant departmental staff (BCP with Action Cards).

Role: Directly handle the incident at the ground level, implementing necessary procedures for containment, recovery, and restoration.

3   Planning and Risk Identification

At TSCG, comprehensive planning is fundamental to our effective Business Continuity Management System (BCMS). We focus on recognising and addressing risks and opportunities for continual improvement.

3.1   Risk Identification at TSCG

TSCG analyses internal and external factors to identify new or emerging risks via the Risk Management Process.

3.1.1 Evaluation and Prioritisation

Risks and opportunities are assessed based on their potential impact on the continuity of educational delivery, the well-being of students and staff, compliance with regulations, and TSCG's reputation with the community and partners.

3.1.2 Addressing Identified Risks and Opportunities

To manage risks and opportunities effectively, TSCG implements preventive measures, develops contingency plans, identifies potential opportunities, monitors and reviews risks, integrates actions into BCMS processes, and evaluates their effectiveness.

3.2 Business Continuity Objectives

Business Continuity Objectives and the plans to achieve them are set and managed via the management review process.

3.3 Changes to the Business Continuity Management System

Planned changes to the BCMS, including the purpose, impact, resource requirement and allocation of resources, are reported via management review meetings.

4 Resourcing

TSCG ensures the necessary infrastructure, resources, and expertise to operate an effective Business Continuity Management System (BCMS).

4.1 Awareness

In TSCG's communication ecosystem, staff are educated on BCMS protocols, roles, and responsibilities during potential disruptions. TSCG creates awareness about the benefits of BCMS and uses feedback mechanisms to gauge the effectiveness of internal communication strategies.

4.2 Documented Information

TSCG secures information, controls the version and reference details and ensures its availability for use.

5 Business Continuity Framework

5.1 Planning & Control

TSCG has established procedures to maintain a proactive and adaptive operational stance to manage disruptions and potential business continuity events effectively.

TSCG conducts periodic risk assessments to identify potential disruptions, evaluate their impact and likelihood, and prioritise recovery efforts. Our Business Impact Analysis (BIA) process helps us determine the maximum tolerable downtime for each critical operation and allocate resources accordingly. We have implemented operational controls such as a robust IT infrastructure, employee training programs, regular equipment maintenance, and communication protocols to prevent disruptions and reduce their impact.

## 5.2   Business Continuity Plans and Procedures for TSCG

TSCG creates and maintains comprehensive plans and procedures to ensure the continuity of critical functions during disruptive incidents.

5.3   Incident Response

The Incident Response Plan details the escalation criteria and response tiers to ensure timely, effective, and proportional reactions to any incident.

Incident Response Levels:
- **Gold Response:** Comprises TSCG's top management responsible for strategic decisions during an incident. They provide oversight, ensure necessary resources are available, and make high-level decisions.
- **Silver Response:** Middle management or departmental heads focus on tactical aspects of response. They manage the overall situation, liaising with the gold team for guidance and the Bronze team for execution. Always the initial point of notification.
- **Bronze Response:** Operational teams dealing with ground-level activities. Their tasks include implementing specific actions required for incident containment, recovery, and restoration based on set procedures.
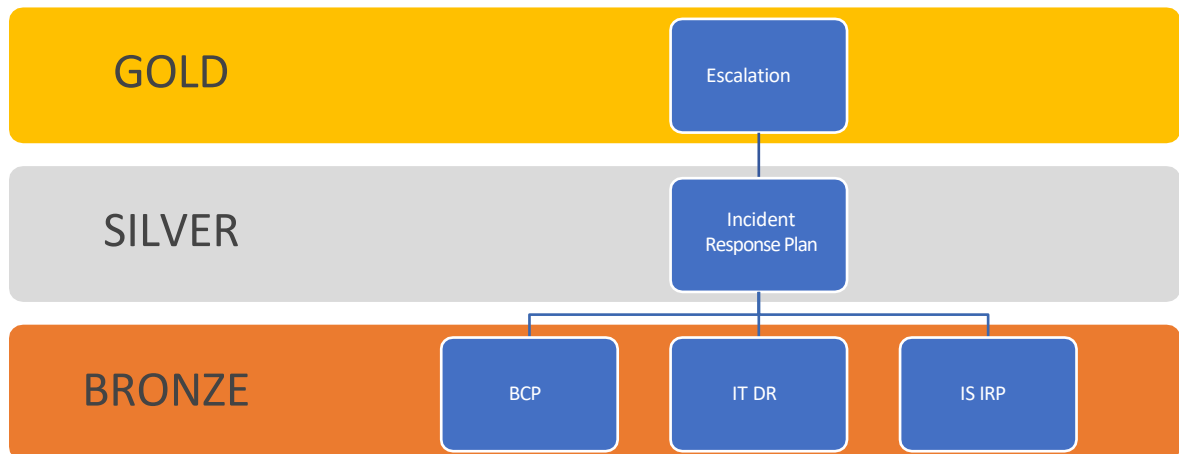
5.4   Incident Escalation Criteria

The criteria and associated level of response are shown in the table. All incidents are reported to the SILVER team for assessment.

		Incident Notified -	
Criteria/Response	BRONZE	SILVER	GOLD
Disruption	Localised disruptions affecting single units or functions.	Multi-department disruptions with more extensive operational impact.	Enterprise-wide disruptions severely affecting core operations.
Potential Harm to Stakeholders	Minimal to no immediate harm to stakeholders.	Significant concerns for stakeholder well-being, safety, or data security.	Immediate and severe risk to stakeholders, requiring top- tier intervention.
Financial Implications	Minor financial repercussions, manageable within department budgets.	Considerable financial implications that might affect operational budgets.	Massive financial impact with potential for long-term fiscal challenges.
Reputational Risks	Limited negative attention, manageable at the operational level.	Significant negative attention, potential for wider media coverage.	Severe reputational risks, widespread negative media exposure.

5.4.1   Potential Incident Scenarios

Threat Area	Description
Physical Threats	Natural disasters, terrorist attacks, or health crises.
Technological Disruptions	IT system outages, cybersecurity breaches.
Operational Challenges	Workforce disruptions, supplier failures, or loss of key staff.
Regulatory and Legal Issues	Compliance breaches, legal disputes, or regulatory changes.
Reputational Risks	Public relations crises, harmful media exposure, or social media controversies.

5.4.2   Departmental Business Continuity Plans (BCP)

Address specific needs and activities of individual departments during incidents. Includes Action Cards. Provide step-by-step instructions for specific recovery activities tailored to each department.

5.4.3 IT Disaster Recovery Plan (IT DRP)

Restore IT infrastructure, services, and data during disruptions. The IT Disaster Recovery Plan (IT DRP) is a collection of playbooks for when things go wrong with the organisation's infrastructure or computer systems. It spells out the steps to take to get the IT systems back up and running smoothly after a disaster or a significant problem so the organisation can keep going.

5.4.4 Information Security Incident Response Plan

Manage and mitigate threats to TSCG's information assets. The Information Security Incident Response Plan (ISIRP) is a collection of playbooks for different computer security situations. Each playbook gives step-by-step instructions on what to do when a specific security problem occurs, ensuring the response is adequate and appropriate escalations and notifications are detailed.

5.5 Testing and Exercising at TSCG

TSCG regularly tests all BCMS, IT DRP, and IS IRP components to ensure they are effective during disruptive incidents. Post-exercise reviews gather feedback, identify gaps, and refine strategies. Each test is documented, detailing objectives, scenarios, participants, observations, lessons, and recommendations.

5.6 Evaluation of Business Continuity Capabilities at TSCG

TSCG regularly assesses the effectiveness of our BCMS documentation and recovery capabilities. All BCMS documents, including the Incident Response Plan and departmental BCPs, undergo an annual review or after significant changes. The reviews ensure up-to-date documents and identify areas for improvement.

6 Performance Evaluation

TSCG regularly audits its BCMS and evaluates policies, procedures, risk management practices, and business continuity strategies. Management reviews collected metrics from the BCMS Workbook.

7 Improvement Management

Improvements and corrections are identified and managed to ensure the BCMS remains resilient and adaptable and continuously evolves to meet TSCG's changing needs and challenges. In the event of an incident, post-incident reviews are completed. Outcomes of testing and other changes are considered regularly by the BCT. Where appropriate, further required actions will be presented to the H&S Committee or Information Governance Group.

APPENDIX A – TSCG Stakeholders

Stakeholder	Requirements	BC Requirements
Governors	Accountability, oversight of strategic goals	Engagement in BC planning, risk assessment
Executive Team	Leadership, strategic decision-making	BC plan development, decision- making under disruption
Employees	Safe work environment, career growth	Remote work policies, training for BC roles
Regulatory Bodies	Compliance with education regulations	Regulatory changes, incident reporting
Partners and Suppliers	Collaboration, service quality	BC planning for supply chain disruptions
Employers	Skilled graduates, collaboration	Collaboration on BC planning, contingency for placements
Alumni	Engagement, support for education	Involvement in BC awareness campaigns
Schools/Colleges/Universities	Transition to higher education	Clear pathways for student progression, BC support
Government/DFE/Local Authorities	Funding, regulatory alignment	Adherence to emergency response protocols
Local Community	Educational support, community cohesion	BC communication, support for community resilience
Landlords	Safe premises, lease compliance	BC communication, premises safety
Insurers	Risk management, insurance coverage	Incident reporting, BC coverage review
Students	Quality education, career opportunities	Communication during disruptions, remote learning plans
Parents/Carers	Student well-being, academic quality	Communication during disruptions, student support
Media/Press	Accurate information dissemination	Crisis communication, BC updates for media

APPENDIX B – Legal and Regulatory Requirements

Regulation	Description	Relationship to Business Continuity
Further and Higher Education Act 1992	Regulates the higher education sector in the UK, including the establishment of universities.	Aligning operational practices with sector-specific educational standards and requirements.
Finance Act 2010	Governs various financial duties, taxes, and public revenue matters.	Ensuring compliance with financial and tax obligations.
Data Protection Act 2018 and General Data Protection Regulation (GDPR)	Sets out how personal data and privacy are protected in the UK and EU.	Protecting personal data and privacy during operational changes and ensuring compliance.
Equality Act 2010	Protects individuals from discrimination and promotes equality of opportunity.	Upholding equality and non-discriminatory practices during all phases of business continuity planning and response.
Skills and Post-16 Education Act 2022	Focuses on skills and post-secondary education, aiming to improve education standards after the age of 16.	Ensuring educational services and standards are maintained during disruptions.
Counter-Terrorism and Security Act 2015	Imposes duties on certain bodies to prevent individuals from being drawn into terrorism.	Ensuring security measures and counter-terrorism considerations are integrated into continuity planning.
Children and Families Act 2014	Covers welfare and support for children and families, including adoption and child arrangements.	Protecting the interests and welfare of children and families associated with the organisation.
Public Interest and Disclosure Act 1998	Protects individuals who make disclosures in the interest of the public, known as whistleblowing.	Safeguarding the process and rights of individuals in whistleblowing cases during organisational changes.
Health and Safety at Work Act 1974	Places duties on employers to ensure the health and safety of their employees and the public.	Ensuring the well-being of employees and the public in the organisation's continuity and recovery efforts.
Health and Safety (Safety of Places of Work) Regulations 1997	Sets the standards for health and safety in workplaces.	Maintaining a safe working environment and compliance with safety regulations during disruptions.

APPENDIX C - BC Policy Statement

Trafford and Stockport College Group Business Continuity Policy Statement

The Chief Executive Officer is accountable to the Corporation's Board for implementing and managing a robust Business Continuity Management System (BCMS) that aligns with industry best practices at Trafford & Stockport College Group.

Objectives:

TSCG's core objectives are to:

1. Prioritise the safety and welfare of employees, contractors, students, and stakeholders.
2. Identify, manage, and mitigate threats that may disrupt our operations, integrating our defined risk appetite into our strategies and solutions.
3. Ensure robust procedures are in place for the timely recovery of critical activities, aiming for uninterrupted, resilient, and high-standard service delivery.

Roles and Responsibilities:

The Chief Finance and Operations Officer is the designated Business Continuity Director (BCD). In collaboration with the Trafford and Stockport College Group's Leadership Team, the BCD constitutes the Business Continuity Team (BCT). The BCT leads the development, execution, and upkeep of Incident Response, IT Disaster Recovery Plans, and other pertinent BC initiatives.

Review and Monitoring:

Regular reviews of BC requirements are essential to ensure that critical activities, priorities, and risk mitigations are appropriately identified and managed. Our business continuity plans are reviewed and tested annually, with subsequent improvements captured through a corrective action and refinement process.

Awareness and Engagement:

All staff members are apprised of this policy. Employees directly involved in BC initiatives or incident responses receive specialised guidance and training.

Guidance on responsibilities, roles, and related documentation specifics is contained within our detailed BCP. In our quest for excellence, the BCD appoints a BC coordinator to oversee, support, and ensure the ongoing refinement of the BCMS, endorsing its alignment with industry best practices and stakeholder needs.

Approval Declaration:

Signed:

Chief Executive Officer – James Scott

Signed:

Chairperson of the Corporation – Graham Luccock