



Business Continuity Policy

Guidance on how to continue operating in the event of a crisis or unexpected event that disrupts the business

Approved by: SMT

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BUSINESS CONTINUITY PLAN (“PLAN”)

1. PLAN OVERVIEW

1.1 PLAN PURPOSE

To provide a flexible response so that Paragon Training Academy 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:
(Insert Training centres here)

1.3 PLAN OWNER & STORAGE

Paragon Training Academy 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 Network, and source document also stored in the company’s shared drive folders.

1.4 PLAN DISTRIBUTION

Distribution of the plan will be to individuals via access to the BCP 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	Phone Number
Subramaniam Ramaswamy	IT Head	07711667160
Prabu Serumadar	Operations Head	07776302441
Manikandan Lingappan	Data Protection Officer	07380961669
Lakshmi Natrajan	H&S officer	07846744422

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 file.

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.

2. PLAN ACTIVATION

2.1 CIRCUMSTANCES

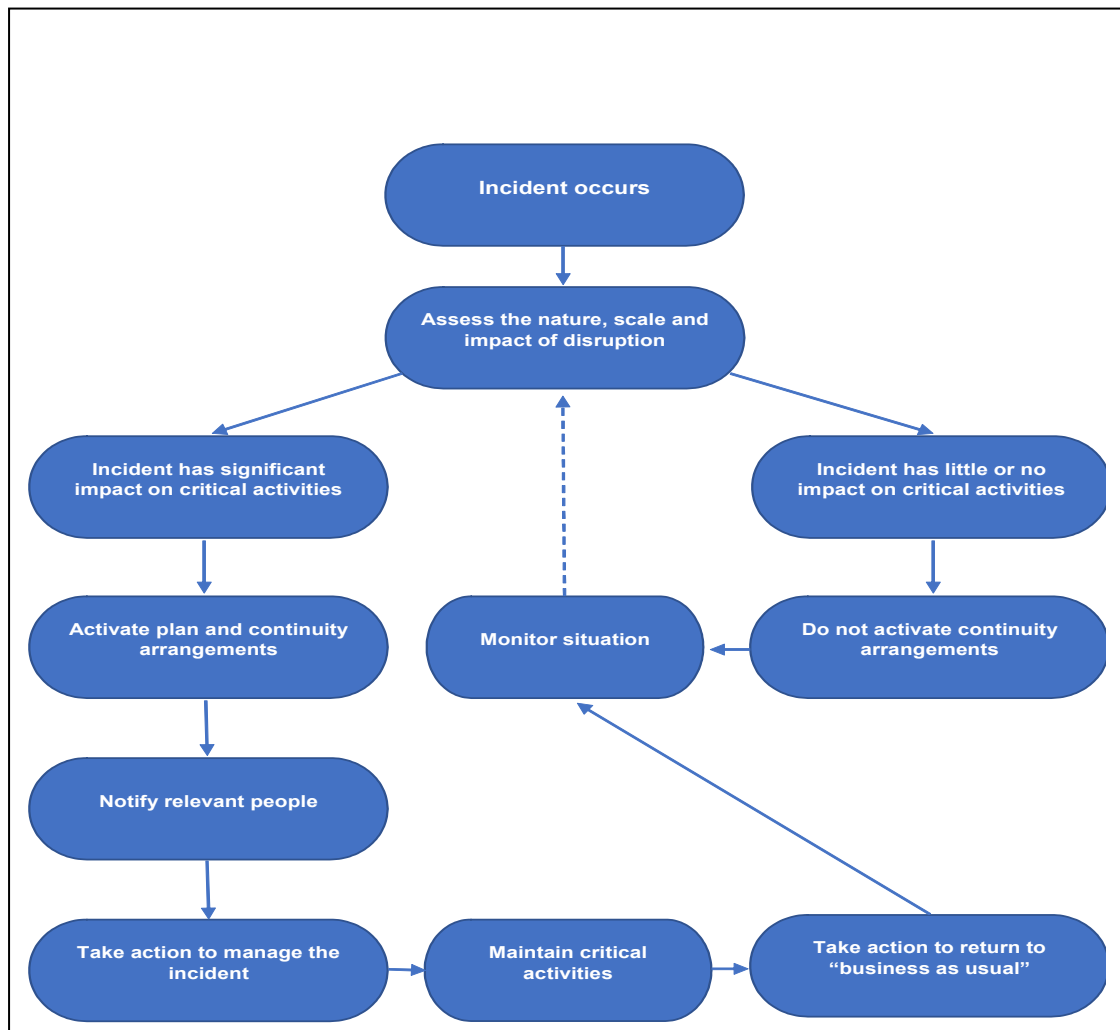
This Plan will be activated in response to an incident causing significant disruption to normal service delivery/business, particularly the delivery of key/critical activities. Examples of circumstances triggering activation of this Plan include:

- Loss of key staff or skills e.g. above normal levels of absenteeism due to illness
- Loss of critical systems e.g. ICT failure/Cyber 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 FUTURE 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:
- The Assembly Point for the training centre is:

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, contractors and visitors as a priority Responsible person to co-ordinate with departmental heads (Head 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 Group

Notification to be posted in the BCP Group as an area where information can be accessed off-premises.

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:

Office/Training Centre Managers are 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 Paragon Training Academy staff are available in the HR system, which is accessible remotely.

**Designated BCT Member is responsible for completing the communication actions.

ALWAYS CONTACTED

- Business Continuity Team (see 1.4)
- Remainder of Senior Management Team

CONTACTED DEPENDING ON INCIDENT

- Middle-Line Managers (where affected)
- All Staff From immediate line manager
- Landlords/Property Owners/Key Suppliers
- Customers – if on site incident
- Customers – general communication if systems down/
- Insurance Company

3.4 ACTIONS TO SUPPORT BUSINESS CONTINUITY

ACTION FUTHER INFO/DETAILS

- 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.
- 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.
- Inform staff what is required of them Ensure communication is concise and consistent.
- Publicise the interim arrangements for delivery of critical activities Ensure all stakeholders are kept informed of contingency arrangements as appropriate

3.5 ACTIONS TO SUPPORT RECOVERY AND RESUMPTION

ACTION FUTHER INFO/DETAILS

- Take any salvage/asset recovery actions that are appropriate. Remove any equipment, furniture, records etc that are at risk of damage.
- 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
- Seek specific advice from Insurance Company
- 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 electronically (if available), which is accessible remotely. Staff contact details are stored in the Head Office 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, however they 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 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 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:

- Training Delivery continuation
- Functioning Website to receive inbound leads
- Access to CRM systems and ability via Telephone system for staff to communicate with customers
- Ability to access banking systems to make and receive payments as required Access to enable electronic and/or telephone 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:

- Access to all other business systems
- Physical Property access (assuming remote access possible)

4.3 BUSINESS CONTINUITY ACTIONS

The Business Continuity Team (See Section 1.4) is responsible for ensuring the following actions are completed:

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 Secure resources to enable critical activities to continue/be recovered Consider requirements such as the staffing, premises, equipment.
 7. 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

- 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.
- Continue to log all expenditure incurred as a result of the incident. Use a financial expenditure log to do this
- 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
- 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
- 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
- Publicise that there is now 'business as usual' Publish via social media and email; and via individual office/team meetings as appropriate