

Catch22 Policy

Business Continuity

Catch 22 Include London

Contents

Page

1. Introduction	2
2. Purpose	2
3. Scope	3
4. Policy statement	3
5. Benefits	4
6. Ensuring continuity – a summary of action	4
7. Related policies	6
8. Example Business Continuity Plan Template	10
Annex 1 – Equality Impact Assessment	15

Policy owner	Headteacher
Queries to be directed to:	Headteacher

This policy will be reviewed on an annual basis.

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

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Document Version Control & Changes

Version	Last modified	By	Changes Made
1.0	01/10/2021	Nigel Richards	Annual Review – no changes
1.1	01/04/2023	Nick Thatcher	Annual Review – changes to page

1. Introduction

This policy outlines the scope and approach to business continuity management (BCM) within Catch22. For the purpose of this policy, business continuity is defined as a framework for creating and improving resilience and which will enable Catch22 to continue to deliver an acceptable level of service of its critical activities in the event of any unexpected disruption.

2. Purpose

As a social business and a supplier of services to local and national government, Catch22 is required to align with or meet the standards that these commissioning authorities work to including, but not limited to, the Security Policy Framework, (SPF) and ISO 22301. Under the Mandatory Requirement 70 of the SPF, Catch22 “must have robust, up to date, fit for purpose and flexible business continuity management arrangements that are regularly tested and reviewed and supported by competent staff that allow them to maintain, or as soon as possible resume provision of, key products and services in the event of disruption”.

ISO 22301 states that, “Top management shall establish and demonstrate commitment to a business continuity policy. The policy shall make reference to:

- a) the organisation's business continuity objectives; and
- b) the scope of business continuity, including limitations and exclusions

The policy shall be:

- a) Approved by top management;
- b) Communicated to all persons working for and on behalf of the organisation; and
- c) Reviewed at planned intervals and when significant changes occur.”

The aim of this policy is to ensure that the appropriate business continuity management system framework is in place within each department/service so that it can meet these requirements and, by doing so,

- Reduce the risk of interruption or negative impact on delivery to key business services;
- Minimise disruption and enable full restoration of services within locally agreed recovery time objectives;
- Ensure that business continuity management principles are embedded in the daily operational activities and culture of the organisation.

3. Scope

This policy will apply to all aspects of Catch22, which, in addition to all corporate and office based activities will include:

- Schools;
- Prisons;
- Staff based at home;
- Staff based at remote or 3rd party locations;
- All external facilities, suppliers, contractors and third parties that the

organisation/services rely upon for business services and products.

4. Policy statement

The Business Continuity Policy has been developed to comply with the requirements of the ISO 22301 Business Continuity standard and to meet established standards for corporate governance.

The organisation's corporate services business groups, frontline services and any other offices will develop, implement and maintain their own risk based business continuity plans and will ensure that they identify:

- Key internal staff, business critical activities, systems and services;
- Key external contacts and emergency contact points;
- Any internal or external service dependencies;
- The risks associated with those dependencies and how they can be addressed;
- Recovery time objectives;
- Potential fall-back options in the event of denial of access to buildings;
- Out of hours contact arrangements.

All business continuity plans must be owned and signed off by a senior member of the relevant operational or corporate support management team (minimum Assistant Director/Head of Service/Vice Principal or above) who will be responsible for ensuring that:

- Plans are maintained and provide an ongoing capability for responding to unexpected incidents;
- A programme is in place to ensure plans are regularly tested and reviewed, (at least annually);
- The necessary in-house resource and expertise are provided to develop, implement and manage the plan, as well as post incident recovery;
- Staff are made aware of the BCM process and that those with business continuity roles receive regular training;
- Roles and responsibilities are clearly defined within the plan;
- Plans contain a risk based business impact analysis that identifies all critical activities and time sensitive business objectives, key suppliers and interdependencies;
- That key suppliers or business partners which support a critical activity have effective BCM arrangements in place and can evidence this;
- A business continuity risk register is developed and maintained;
- A business continuity coordinator/practitioner is appointed to liaise with the Organisational Business Continuity Team Secretariat* during an emergency/post incident recovery when required to do so.

Arrangements will be developed to independently audit BCM governance processes at regular intervals (at least annually) to ensure that they conform to the core principles of ISO22301 and this policy.

*The Organisational Business Continuity Team Secretariat would be comprised of senior Directors plus co-opted individuals as required depending on the incident. It is envisaged that this group would only be convened in the event of a serious and

significant threat or disaster.

5. Benefits

This policy is designed to provide a clear commitment by Catch22 to business continuity management across the whole organisation. Effective business continuity will enable Catch22, its partners, suppliers and affiliates to:

- Continue to provide critical services to service users, the public, business partners and other stakeholders during unexpected incidents;
- Minimise disruption and enable full restoration of services in the event of an incident;
- Comply with accepted standards of corporate governance;
- Reduce the operational and financial impact of any period of disruption;
- Ensure that all key personnel are identified and made aware of their responsibilities in regard to any recovery procedure;
- Improve the resilience of the organisation's infrastructure to reduce the likelihood of disruption; and,
- Ensure that the business continuity management structure is embedded in the day-to-day operational activities and culture of the business.

6. Ensuring continuity – a summary of action

IT Systems - Catch22 recognises the increasing importance of IT systems to the successful delivery of our business; particularly a reliance on email communication and data management software.

To ensure the security and continuity of our IT systems Catch22 will require any third party IT supplier to provide us with a system resilience and disaster recovery plan that includes a full risk and impact assessment, details of any dependencies and fail over arrangements, target recovery times and out of hours arrangements.

As a minimum standard Catch22 will ensure the following measures are implemented and maintained:

Hybrid Cloud data solution

- Replication of data to an off-site co-location, facilitating the restoration of data if required.
- Backups made to tape and sent off-site at regular intervals. For long term storage
- A hybrid Cloud solution that replicates both off-site data centres with instant fail-over.
- In the event of a physical disaster, servers can be brought up in a co-location data centre.
- High availability O365 systems which keep both the data and system replicated off-site, enabling continuous access to systems and data, even after a disaster.
- UPS and back-up generator to keep systems going in the event of a power failure for sensitive equipment.
- Core backbone internet for private cloud infrastructure.

- Wanstor as the managed service provider will be the main point of contact for recovery to be carried out.

Local site setups

- Azure domain-joined devices using MS OneDrive, TEAMS and SharePoint apps to store, backup and protect company data.
- Surge protectors — to minimize the effect of power surges on delicate electronic equipment.
- UPS to keep systems going in the event of a power failure for sensitive equipment.
- Fire prevention/mitigation systems such as alarms and fire extinguishers.
- Anti-virus software and other security measures.
- Access to 4G LTE modems or mobile tethering for failover in the event of internet-related outages.

In the event of core infrastructure communications failure, alternative (off band/out-of-band) communications will be utilised e.g. WhatsApp, mobile phone and face to face contact.

Disease Epidemics/Pandemics - Catch22 have recognised the possible impact of a disease / flu / infectious disease epidemic or pandemic as potentially drastically reducing a healthy work force and placing significant strain and change on working arrangements. In order to ensure that Catch22 can minimise the risk of infection to our work force, and reduce potential disruption to our services some basic criteria have been identified:

- Awareness of World Health Organisation & Government controls in the case of an epidemic or a pandemic - first and foremost to realise the importance of complying with these control measures to minimise the risk to the larger population and health of our own workforce. In the most extreme cases we recognise that we would unavoidably have to shut our premises / sites down if instructed and facilitate alternative working arrangements (e.g. working from home) as permitted or advised by Government or other lead agency.
- Education of the staff base – an agreed percentage of staff will be trained in first aid to ensure that they are aware of the basics involving the transfer of disease / infections.
- Local safeguards - all managers will ensure that wash areas are kept clean and available at all times and that any repairs or re-charging of soap or hand towel dispensers is carried out as a priority
- Monitoring of direct & subcontract staff, volunteers and service users in the incident of a possible outbreak - if the Government raises the possibility of an epidemic or pandemic all managers will be instructed to monitor all those present for signs of infection and to send them home where there is a relevant case and notify the H&S team. In these circumstances managers will ensure that a report is sent immediately to the H&S team and that all due precautions are taken to avoid further infection/contamination. Any guidance from the World Health Organisation or the Chief Medical Officer of Great Britain will be disseminated widely using all communications systems available as required.
- Ability to work remotely / at home – where work does not have to be carried out in the office, staff can access documents / email from home based computers, meaning that even if a site cannot open, information exchange can continue,

- and core administrative activities can be undertaken remotely.
- Details of local and national key contacts and emergency contact points to be available and accessible for the management and monitoring of any actual or suspected infectious disease incident

Natural Disasters / Extreme Weather / Fire - Catch22 recognises that such events are likely to be localised, notwithstanding the effects of flooding which can cover wide geographical areas.

In such an event our priority will be to ensure the safety of our workforce and the general public (if affected) through co-ordination with the relevant emergency services. Once we are satisfied that all parties are safe and the disaster / event is over we will aim to assess the damage to our sites / business premises as soon as possible, and put together specific contingency plans to put our services back on track. Where the disaster has damaged a building, we will go through the proper channels with our insurers to identify costs and carry out remedial works.

Industrial Action / Mass Resignations - Catch22 has assessed the risk of mass industrial action / staff walk out as extremely unlikely, especially for key management staff, given our staff turnover and 'open' communication culture which encourages early resolution of any dissatisfactions or staff problems.

We also recognise the importance of holding regular supervision and contribution reviews to sustain employee motivation.

We recognise that any action that affects all employees, such as pay cuts or redundancies, must be carried out with appropriate consultation and recognition of their rights and relevant legislation.

Economic Downturn - Catch22 recognises the risk that an economic downturn poses to the continued successful operation of our business. In the case of such a downturn a structured financial review will be implemented in all our operations and support functions to target cost efficiency savings, identify any potential need for redundancies, and to forecast future cash flow and its effect.

Continuous monitoring of the economic environment in which we operate and our own financial performance is embedded in regular reporting to senior management and the Trustee Board.

Frequency of Testing - Catch22 recognises that it is important to test our continuity mechanisms so that we can be sure that they will operate effectively in 'real' circumstances.

We implement disaster recovery testing on our IT systems once a year.

We maintain up to date Fire Marshall & First Aid training and records for all of our services and office locations in line with the minimum necessary requirements.

7. Related policies

- Annual and special leave policy
- Controlling and safeguarding assets in services policy

- Data management & protection policy
- Fire safety policy
- First aid policy
- Flexible working policy
- Gas safety policy
- H&S management arrangements
- Home working policy
- Incident and near-miss reporting policy
- Infection prevention and control policy
- Lone working policy
- Personal protective equipment (PPE) policy
- Personal safety and service user risk management policy
- Property management policy
- Risk assessment & management policy
- Organisational risk policy
- Severe weather policy
- Travel and subsistence expenses policy
- Water safety policy
- Workplace environment policy

- BUSINESS CONTINUITY MANAGEMENT PLAN -

LOSS OF BUSINESS LOCATION/STAFF UNAVAILABILITY

1) Aim of this Plan

To help prepare the business to minimise the risk or cope with the effects of a major incident which involves the loss or prolonged unavailability of one or more of our business locations or staff.

2) Approach

This plan details the steps to be taken which are common to all locations in order to avoid or minimise the likelihood of the occurrence of such an incident and the impact of that incident should it occur (Risk Mitigation).

It also identifies the steps to be taken which are common to all locations should such an incident occur (Action Required Following Occurrence of Incident).

The plan identifies 3 key roles should an incident occur:

- I. Responsible Director - if out of normal business hours then initially this will be the Head of Quality & Impact, Education. Responsibility will normally be transferred as soon as practical to the SLT with responsibility for the location affected. Responsibilities include:
 - Nominating a Local Lead
 - Nominating an Incident Support Manager
 - Providing advice and support to the Local Lead
 - Informing the CEO, Chief Office Group, other Directors and Trustees as appropriate.
 - Ensuring the Communications and Engagement team are informed if there is a possibility of media interest.
- II. Local Lead (usually the location manager) who will lead, on the ground, with the immediate issues relating to staff, service users, commissioners and continuing to provide local services.
- III. The Incident Support Manager (normally but not always the Director of Business Services) whose role is to allow Local Leads to concentrate on local matters.

Responsibilities include:

- Informing insurers, co-ordinating claims and discussions with loss adjusters
- Support as regards provision of alternate premises, services and supplies.
- Providing practical help and advice to the Local Lead.

3) Risk Mitigation

This section outlines the existing arrangements which should be in place in all locations to avoid or minimise the likelihood of an incident taking place and to reduce the impact should such an incident occur. It is the responsibility of managers with responsibility for each location to make sure these arrangements are, indeed, in place and, if they are not, to take immediate action to put them in place. Once in place they should be updated and reviewed on at least an annual basis.

Local Arrangements

Staff	Record out of office contact details for all staff so that contact can readily be made advising them of the situation and arrangements to be made should an incident occur. Identify extent to which they can work from home if necessary. Contact lists should be kept securely off-site and copied into a "Business Continuity" folder within the service's shared drive on the "cloud" server as necessary. In the event of an outbreak of a serious disease, or in the event of staff being unavailable or unable to get into work, managers must ensure they have suitable plans for notifying partner agencies, referrals sources, service users, commissioners, other stakeholders and their staff group of the measures being taken to manage the situation. These measures may include working from a different location e.g. home, reducing contact with other staff and service users (emergencies only), ensuring suitable health and hygiene measures are implemented and used. Managers must ensure that they have details of the key contacts they need to access in the event of a health, environmental and/or building incident or emergency e.g. the local public health office, environmental health office, landlord or managing agent including out-of-hours details etc.
Service Users	Record contact details for all service users so that contact can readily be made advising them of the situation and arrangements to be made should an incident occur. Contact lists should be kept securely off-site and copied into a "Business Continuity" folder within the service's shared drive on the "cloud" server, as necessary.
Critical Suppliers	If any supplies are crucial to the running of the service/function compile a list of these critical suppliers with contact details so that replacement items can be easily obtained. Contact lists should be kept securely off-site and copied into a "Business Continuity" folder within the service's shared drive on the "cloud" server, as necessary.
Communication systems	In the event of a failure of telephony or IT equipment/systems, ensure that the issue is reported and escalated according to the requirements of the system involved. Managers must ensure that

	they have contact details for systems providers and escalation points recorded in an accessible format in the event of their failure. If access to the Catch22 IT system is due to local telephony or cabling issues then alternative work areas can be sought. Catch22 systems are designed to be resilient and accessible as long as a suitable internet connection can be established; accessing data on insecure WiFi provision is not permitted. Any failure of the main Catch22 “cloud” service will be managed via the Facilities & IT office.
Stakeholders/ Commissioners/ Partners	Compile a contact list of contacts so that stakeholders etc. can be informed of the situation. Contact lists should be kept securely off-site and copied into a “Business Continuity” folder within the service’s shared drive on the “cloud” server, as necessary.
Premises	Ensure all property risk assessments are in place and all recommendations acted on including provision of fire exit notices, fire detection and/or fire suppression systems, appointment and training of fire wardens and regular fire drills and testing of evacuation procedures and equipment. If safe and/or possible, take appropriate action prior to an event in order to minimise the potential impact, e.g. in the case of a potential flood it may be possible to use sandbags, in the case of severe weather like high winds, it may be possible to board doors and windows etc. In the event that heavy snowfall is predicted, take appropriate action to ensure that a plentiful supply of salt/grit and/or snow shovels are available to help clear access routes to the premises if necessary. During a terrorist alert/attack, it may be the case that mobile phone signals are suspended for a period of time and it would be prudent to familiarise yourselves with the nearest public phone booths. Public transport links might also be affected/suspended and consideration should be given to making contingency transport arrangements during such an event. Where possible identify and record alternative temporary premises in advance which could be used in the event of incident. If not possible identify short list of letting agents/serviced office providers who could provide alternative accommodation at short notice. Provide a copy of all this information and contact details to the Facilities Department.
Service Delivery	Location Managers should ensure that detail plans are formulated in advance where it is practical to do so, that they are kept up to date and that staff are aware of them.

	It may be useful to conduct “rehearsals” on a periodic basis. However it may not always be possible to plan, in advance, for every eventuality given the potential differing degrees of seriousness of each situation and the variability of the services we may run at any particular time. Even if it not practical in particular situations location managers should give some thought as to the steps, they would need to take generally should a situation arise and record and share their thinking. Note that requirements from commissioners may call for detailed recovery plans to be compiled in advance for certain activities /services. When this is the case it is the responsibility of the service/area concerned to prepare those plans to the level of detail required by the commissioners. It may also be the case that operational management feel it to be beneficial to prepare recovery plans in advance in relation to some key activities.
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4) Local arrangements for each location/issue

Please detail the arrangements you have put in place for each location you are responsible for (add rows as required).	
Location/issue	Details
Catch-22 Include London 191 Freston Road London W10 6TH	<i>If the building were to be closed in an emergency for 1-5 days, all staff would be able to work from home where appropriate. Freston Road students could be educated from home for a period of time, if assessed as safe to do so.</i> <i>If the emergency closure was for 5 days+, Catch22 Include London would contact RKBC and ask them to identify a space where a reduced service could be delivered. For example, libraries or community centres.</i>
Phoenix Centre Dormers Wells Lane Southall UB1 3JB	<i>If the building were to be closed in an emergency for 1-5 days, all staff would be able to work from home where appropriate. Phoenix Centre students could be educated from home for a period of time, if assessed as safe to do so.</i> <i>If the emergency closure was for 5 days+, Catch22 Include London would contact Ealing Council and ask them to identify a space where a reduced service could be delivered. For example, libraries or community centres.</i>
Staff unavailability	<i>Staff will be asked to work from home in the event of a serious contagious infection. Contact with service users will be by phone only except in emergencies and authorised by manager or most senior person available (in the event the manager is sick). Situation to be monitored on a daily basis and staff group kept informed by email and phone.</i>

5) Action Required Following Occurrence of Major Incident

All incidents must be reported via the Catch22 incident reporting process.

The steps to be taken following an incident will vary depending on its severity and the services affected. There are however some generic actions that need to be taken in respect of all major incidents. These are detailed below:

- If the situation is local to or specific to one of our buildings, the local manager or staff should ensure the Emergency Services have been called.
- In the event of a major incident, such as a terrorist attack, riot, natural disaster etc., it may be the case that whilst the premises is not damaged, access to the building might be restricted by the police/emergency services. Liaison with the emergency services is essential to ascertain the likely timescales involved until access is granted.
- If the situation calls for it and **it is safe to do so**, the local manager or staff must, as far as possible, make sure no one is still inside the building or has been injured or killed in any related event.
- In the event of a health (infectious disease) or environmental concern or incident, managers must contact the local responsible officer in public health or the local authority and follow their instructions and advice.

Outside normal business hours, the local manager or staff must report the incident using the emergency out of hours contact number **07881913110**.

If for any reason the out of hours number cannot be contacted staff should use one of the contact numbers for other Directors detailed at the end of this report.

6) Contact List of Telephone Numbers (operational services)

Out of Hours Support: **07881913110**

Details of the line management for each service/location should be completed in the table below and kept up to date. Additional names and numbers can be added as required: -

Role	Name	Landline	Mobile
Strategic Director – Justice and Alternative Education Services	Lisa Smitherman		07894621698
Head of Quality and Impact, Education	Gemma Wall		07881913110
Head Teacher	Jamie Nielsen	0203 582 9351	07939524856
Assistant Headteacher	Tamme Chapman	0203 582 9356	07764810763

Acting Assistant Headteacher	Sonia Alexander	0203 582 9351	07585957729
Deputy Headteacher	Courtney Bajak-Hunte	0203 582 9356	07903863337

There may be circumstances where corporate services directors or assistant directors will also need to be contacted and their contact details are given below:-

Name	Role	Number	Mobile
Jon Davenport	<i>Director of Business Services Incident Support Manager</i>	01959 578248	07872 422513
Melissa Milner	Director of Communications and Engagement	0207 336 4837	07734 824610
Naomi Hulston	Chief Executive	020 7336 4800	07831 711437
Christina Duru	Chief People Officer		07778 358383
Nigel Richards	Chief Financial Officer	020 7336 4851	07717 290559
Vacant	Chief Operating Officer		
Liz Cole	Head of Health & Safety	01959 578244	07795 428336

Services may also need to inform local partners/commissioners/other agencies or suppliers of any serious service interruption. Key contact details for these people/organisations should be completed below and kept updated: -

Name	Organisation	Number	Mobile
Enlight Group Limited	Facilities/Cleaning	0207 117 2830	
Ayam Zaman	Catering	0208 740 6816	
Damian	Builders Company		07711069790
Superb Security Solutions Ltd	IT Solutions	0207 459 4598	
Royal Borough of Kensington and Chelsea	Local Authority	020 7361 3009	
Brent Council	Local Authority	020 8937 1234	
Ealing Council	Local Authority	020 8825 5522	
Caterlink	Catering – Phoenix Centre	0118 929 4482	

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Business Continuity Policy
EIA completed by:	Nick Thatcher, Head of Governance & Risk
Date of assessment:	01 April 2023
Assessment approved by:	N/A

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, fostering good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully

considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	No impact although managers must ensure that any alternative working arrangements are assessed to determine if they have a negative impact and are then mitigated.
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	

Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.