

LUMINATE BUSINESS CONTINUITY MANAGEMENT POLICY 2024/27

Applies to:	
Harrogate College	X
Keighley College	X
Leeds City College	X
Leeds Conservatoire	X
Leeds Sixth Form College / Pudsey Sixth Form College	X
Luminate Group Services	X
University Centre Leeds	X

CHANGE CONTROL

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Approval route		
Approval committee (ELT, SELT, Board)	Date approved	Version
SELT	June 2024	8
Health & Safety Committee	June 2024	8
Business Continuity Steering Group	June 2024	8
Name of author:	Safety, Health and Environmental Services	
Name of responsible committee:		
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Policy will be communicated via:	Sharepoint, google and Health & Safety Management Systems.	
Next review date:	March 2027	

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1. Policy Introduction

Increasingly, there is a requirement for organisations to have in place formal systems which prepare them for disruptive events and which set out the arrangements designed to minimise the effects of such events.

Business Continuity Management (BCM) improves Luminate Education Group (LEG) resilience by identifying in advance potential threats and planning for the possible impacts of sudden disruptions to key services and critical functions. It provides confidence to funding bodies, stakeholders and the LEG community as well as protecting potential reputational damage.

Business Continuity Lifecycle



In addition, an overarching Luminate Education Group “Major Incident Plan” (often referred to as a disaster recovery plan) describes the central arrangements for responding to major disruptive events, managing the effects on LEGs business and the circumstances in which FE colleges/schools, Leeds Conservatoire, academic and support areas local incident response and business continuity plans should be initiated.

Strategic oversight of the BCM plan resides with Luminate Group ELT.

2. Purpose and Scope

This policy provides the strategic framework for the implementation of BCM across the Luminate Education Group. It follows recognised best practice and business continuity (**lifecycle model illustrated above**).

All College Principals, Heads of Schools and Services within individual campuses play a key part in maintaining the delivery of critical functions. The requirement to plan applies to all identified functions that are critical to the business process.

Business Continuity Management Plans contain the recovery arrangements which will enable the affected area to perform critical functions and provide a minimum level of service in the event of an emergency or disruption. In addition there are “events” such as open days or graduation ceremonies that are critical to the success of Luminare Education that should be included as critical activities.

The Business Continuity Management Plan should complement the Major Incident Plan for Luminare and individual College and School “Incident Response Plans” within the Luminare Group.

The purpose of this policy is to ensure that:

Protecting and recovering the critical activities of the Group are considered. A critical activity is one that would impact on the reputation of the Group or have a serious impact on its financial position or stakeholders if it was not performed or resumed within an appropriate defined period. This is likely to include some activities in the following areas: teaching (including assessment) and exams, vocational subjects such as engineering and motor vehicle. Professional Services such as IT, HR and Estates.

The Business Continuity Management Policy has the following key aims:

- To raise the profile of BCM within the Group. This will include ensuring that staff are aware of the plans, their roles and receive appropriate training
- To embed Business Continuity Planning into the culture of the Group so it becomes an integral part of decision making
- To ensure that critical activities across the Group are identified and that suitable Business Continuity Plans are in place or developed for them
- To establish appropriate structures to plan for and respond to incidents
- To ensure that Business Continuity Plans are ongoing and subject to regular reviews, audits and exercises
- To develop and review Business Continuity Plans for continuous improvement, in accordance with best practice.

3. Managing Business Continuity

It is expected that all campuses within the Group will continually develop and regularly update Business Continuity Plans. This will involve identifying critical business activities, the arrangements in place to continue to provide these activities in the event of a disruption as well as resource requirements. Individual Campuses/ Departments/Schools/Centres will be expected to nominate appropriate people (**Business Continuity Coordinators**) to co-ordinate the development of their Campus/Department/Schools/Centre’s Business Continuity Plans.

- Campus/ Departments Business Continuity Plans will be reviewed by the Business Continuity Coordinators at least annually, and will also be updated when there are significant changes to personnel, premises, suppliers etc.
- Retention of key contact list by senior management in the event of a major incident.
- Exercises to test a sample of the Business Continuity Plans will normally be held annually
- Training and awareness will be a key and ongoing part of Business Continuity Management System.

The Luminate Head of Safety, Health and Environmental Services (**Business Continuity Manager**) will provide support as required.

The following process will be used to embed Business Continuity across Luminate Education Group. The process follows the Business Continuity Lifecycle illustrated above.



4. Roles and Responsibilities.

4.1. Identification of Responsibilities

The Group management roles identified as having Business Continuity responsibilities has been developed from the Luminate Education Group structure charts.

- 1.1.1. Luminate Education Group - Chief Executive Officer (CEO)
- 1.1.2. Luminate Education Group - Board of Governors (Board)
- 1.1.3. Luminate Education Group - Executive Leadership Team (ELT)
- 1.1.4. Luminate Education Group - Senior Leadership Team (SLT)
- 1.1.5. Luminate Education Group - Management Team (LMT)

4.2. Luminate Education Group - Chief Executive Officer (CEO)

The CEO has overall responsibility to provide a safe working environment, and systems of work ensuring compliance with general duties of the Health and Safety at Work, etc. Act 1974, its delegated legislation and the requirements of these Policy arrangements. The CEO is also responsible for ensuring that the BCM plan, as agreed by the Board of Governance, is implemented.

4.3. Luminate Education Group - Board of Governors (Board)

The Board accepts its collective role in providing Business Continuity Leadership. It expects management to ensure Business Continuity is an integral part of the Group's operations. The Board will ensure that its decisions reflect the Group's Business Continuity intentions, as articulated in this Policy.

4.4. Luminate Education Group - Executive Leadership Team (ELT)

The Group Executive Leadership Team (ELT) has a responsibility to provide a suitable Business Continuity Management Plan (BCM)

4.5. Key Roles:

Role	Responsibility
Deputy CEO	<ul style="list-style-type: none"> • Luminate Major Incident Coordinator • Owner of Luminate Major Incident Management Plan and Business Continuity Framework
Business Continuity Steering Group	<ul style="list-style-type: none"> • To oversee programme and policy work development
College Principals, Heads of Schools and Services	<ul style="list-style-type: none"> • Internal leaders of Business Continuity who will lead on the completion of the BCM process in their respective areas and further embedding of business continuity across Luminate.
Luminate Staff	<ul style="list-style-type: none"> • Contribute to the business continuity planning process. • Share information on how their functions are delivered. • Have awareness of BC plans and procedure once developed. • Work in accordance with any BC plans and procedures should they be activated.
Group Director of Estates	<ul style="list-style-type: none"> • Responsibility for physical infrastructure, identifying, sourcing and enabling alternative accommodation, power source arrangements for teaching and office space if required.
Group VP Development	<ul style="list-style-type: none"> • Responsibility for maintaining an incident communications response plan, for effective communication with staff, students and other stakeholders.
Group Director of IT	<ul style="list-style-type: none"> • Responsibility for provision and maintenance of data, telecommunications and IT systems and networks, and for ensuring a robust and suitable response to data and/or telecoms failures.
Chief Financial Officer	<ul style="list-style-type: none"> • Responsibility for managing emergency expenditure and liaison with Luminate insurers.
Director of Student Life	<ul style="list-style-type: none"> • Responsibility for arranging provision of essential student services during and following an emergency.
Head Safety Health & Environmental Services	<ul style="list-style-type: none"> • Responsibility for ensuring the Health & Safety of all Luminate staff, students and visitors

Group Director for People, Development & Culture	<ul style="list-style-type: none"> Responsible in the event of serious injury / loss of life.
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5. Business Continuity Steering Group

As the senior decision making group, the Business Continuity Steering Group (**Appendix 1**) is responsible for:

- Ensuring there is a consistent approach to Business Continuity across the Group
- Supporting and endorsing the BCM plan,
- Raising awareness regarding Business Continuity with the aim of embedding it into the culture of the Group
- Monitoring the roll out of BCM plans across the organisation
- Reviewing the BCM policy to ensure it remains fit for purpose

6. Key Hazards

A matrix (**Appendix 2**) is attached that identifies the key hazards that could cause a disruption. The main reasons for plan activation is likely to be one or more of the following

Partial or total loss of one or more of the following
1. Staff and/or students
2. Buildings, facilities or equipment
3. Utilities or other critical services e.g. water and electrical supplies
4. Communications or computer systems e.g. data, network servers, telecoms
5. Business critical suppliers, contractors or partners

7. Review

The Group reserve the right to review this policy at any time. However, at minimum this will be no later than March 2027.

Acceptance of policy

I confirm that I understand the contents of this Policy and procedure (Luminate Health and Safety Policy arrangements document), and I accept responsibility for ensuring the Policy is implemented and followed in the areas within my control.

Name	Department / Position	Signature	Date
.....			/ /

Appendix 1

Business Continuity Management Steering Group

Terms of Reference

The Steering Group will:

- Review Luminate Business Continuity Management Plan and develop a corporate business impact assessment.
- Review the Major Incident Plan.
- Review any skills, competence requirements and training needs.
- Agree an annual programme of work to review Business Continuity and Major Incident Plans.
- Communicate with Luminate Group members at a strategic and operational level in order to ensure that colleagues are aware of the purpose of the Steering Group and to encourage a corporate approach to Business Continuity Planning.
- Meet as required at least once a year.
- Report to Luminate ELT and Health & Safety Committee.

Membership of the Steering Group will provide expertise in the following key risk areas: risk management, legal and compliance, health & safety, estates and facilities management, IT services and records management, student services, marketing and communications. The standing membership will include:

- Deputy CEO (Chair)
- Head of Health, Safety and Environmental Services
- Group Director of Estates
- Group Director of IT
- Group VP Development

Visiting members may be invited and sub-groups formed to work on discreet areas of activity including:

- Group Director for People, Development & Culture
- Chief Financial Officer
- Director of MIS
- Group Head of Communications & External Affairs
- Deputy Director Safeguarding, Behaviour and Wellbeing

Minutes of meetings will be shared with Principals and Heads of Schools and Services: with responsibility for Business Continuity within their School/Service. The Chair will provide reports to the Luminate ELT.

Appendix 2: Luminate Education Group Hazard and Threat Matrix

MAJOR INCIDENTS			Likelihood			Impact		
Major Health Incident	Response Trigger	Response Action	BC Failure issues			H	M	L
Pandemic/Major health outbreak	Communicable disease notified by PHE	- Implement Communicable diseases protocol	Loss of staff and students. Increased cleaning regimes(infection control)	x			x	
Major Weather Incident	Response Trigger	Response Action	BC Failure issues			H	M	L
Extreme weather events e.g. wind damage, flooding or snow, disruption lasting more than 24 hours	Reports of structural/building damage. Weather forecasts	- Salvage operations. - Source alternative accommodation. - Communication Plan	Loss of buildings, impact on offices and teaching, utility interruption – power supply, road/transport disruption, impact on staff and students ability to get to campus.		x			x
Major Incident within Luminate Group Campuses	Response Trigger	- Response Action	BC Failure issues			H	M	L
Fire/serious building damage	Emergency services/incident response team	- Building evacuation (as above)	Loss of buildings, impact on office and teaching space		x		x	
Utility failure e.g. power failure, loss of water.	Incident response team	- Supply of generators. - Close buildings	Loss of facilities e.g. lifts. Access to PCs equipment. Welfare issues e.g. lighting, heating, Loss of buildings	x			x	
Terrorist attack	Police/Incident response team	- Invacuation - evacuation/police led	Loss of buildings, impact on offices and teaching.			x	x	
Hostage situation	Police/Incident response team	- Invacuation - Evacuation/police led	Loss of buildings, impact on offices and teaching			x	x	
Bomb threat	Police/Incident response team	- Invacuation - Evacuation/police led	Loss of buildings, impact on offices and teaching		x			x
Leaks from hazardous materials	Emergency services/Incident response team	- Major Incident Plan	Loss of area of campus. Impact on offices and teaching.			x		x

MAJOR INCIDENTS				Likelihood			Impact		
Industrial action/student protests	Notification from Unions	Manage situation	Loss of staff, impact on teaching. Loss of students attending lectures etc. Loss of buildings, impact on offices and teaching		x			x	
Major IT Failure	Response Triggers	- Response Action	BC Failure Issues	H	M	L	H	M	L
Loss of IT	IT – availability impaired	- IT Major Incident Plan activated	Access to information, data, communications, teaching materials, on-line exams, assessments, Website, Internet access		x		x		
Loss of mobile telephones	No telephone service	- Use landlines and email	Impact on communication		x		x		
Loss of land lines	No telephone service	- Use mobiles and email	Impact on communication			x			x
Cyber/crime (Major and successful)	Slowness and non-responsive IT systems	Close down website	Loss of data/No access to IT		x		x		
Major Incident outside Luminate Group Campuses	Response Triggers	- Response Action	BC Failure Issues	H	M	L	H	M	L
Off-site incident external to campus. Abroad or town centre	Contact via third party/Police	- Set up helpline. - Communications Plan	Possible impact on service delivery. Loss of staff and students. Closure of campus.		x			x	
Fuel Shortage	Via media	Provide services remotely	Loss of staff and students, impact of staff on critical activities and getting to campus			x	x		
Collapse of major supplier or service provider	Via media or notice period	Find alternative suppliers/providers	Impact on service delivery		x			x	

Appendix 3: Critical Activities identified by Business Impact Assessment

Services	Critical Functions/Events	Description
1. Estates & Facilities	Security	Physical security of estate, staff and students
	Incident response to campus emergency, utility or estate infrastructure failure	Action to respond and recover from incidents affecting Luminate Education Group estate.
2. IT	IT and Information Services including Telecoms	Management of the IT and telecoms service provision across Luminate Education Group
3. Financial Services	Procurement	Procurement of goods and services
	Payroll	Processing and payment of staff
4. Human Resources	Staff Welfare	Staff recruitment and welfare
5. Marketing & Communications	Student Recruitment	Processing of student applications
	Clearing	Process to place students following outcome of GCSE's and A Levels
	Public Relations/Communications	Release of agreed information to internal staff and external media including social media; and ensuring a website presence
	Open Days, including applicant open days, study fairs and visits.	Campus activities to recruit students
6. Exams	Examinations	Working with Schools to schedule examinations in suitable locations at determined times and dates.
	Graduation/Award Ceremonies	Organisation of Award Ceremonies
7. MIS	Statutory Data Returns	Submission of mandatory returns to sector agencies/bodies
8. Student Engagement/safeguarding	Support to vulnerable students	Mental/physical Health support to students. Ensuring and maintaining a safe and secure environment
9. Schools and Curriculum Areas	Teaching including specialist facilities	Teaching of courses
	Awards and Ceremonies	Examinations and assessments
	Student Experience	Attendance monitoring, disability, student support, timetabling, student placements