

# BUSINESS CONTINUITY POLICY & PROCEDURE

## 1) Policy Statement

- a) Engineering Trust Training (ETT) recognises its responsibility to learners, employers, staff, and stakeholders to maintain continuity of service in the face of disruption.
- b) This document establishes the framework for identifying, responding to, and recovering from critical incidents that threaten our ability to deliver apprenticeship programmes or meet our DfE/DWP contractual obligations.
- c) We are committed to ensuring that disruption is minimised, learners are protected, and our statutory duties are fulfilled under all circumstances.

## 2) Scope

- a) This policy applies to all ETT staff, learners, employers, and subcontractors. It covers all ETT premises, data systems, delivery models, and funded programmes, including but not limited to apprenticeships.

## 3) Core Objectives

- a) In the event of a critical incident, ETT will prioritise the following objectives in order:
  - i) Protect the welfare and safety of learner and staff
  - ii) Maintain the continuity of learning, assessment, and support
  - iii) Fulfil all DFE/DWP funding rules and contractual obligations
  - iv) Protect ETT's reputation, financial stability, and regulatory standing
  - v) Ensure clear, timely, and transparent communication with all stakeholders

## 4) Governance and Roles

- a) Effective business continuity requires clear leadership and accountability.
- b) ETT has and maintains an Emergency Action Plan (EAP) the sets out how the organisation will respond to a critical incident. This includes governance, roles and responsibilities.

## 5) Emergency Contacts

- a) Internal

Role	Contact
ETT Main Office	The Engineering Trust Training Ltd, 11 Wedgwood Road, Bicester, OX226 4UL. Telephone 01993 882008, email <a href="mailto:info@theengineeringtrust.org">info@theengineeringtrust.org</a>
Chief Executive Officer (CEO)	Mark Vingoe: 01993 882008, 07939 296280 email: <a href="mailto:m.vingoe@theengineeringtrust.org">m.vingoe@theengineeringtrust.org</a>

Director of Delivery & Operations)	Melvyn Parr: 01993 882008, 07807 348696 email <a href="mailto:m.parr@theengineeringtrust.org">m.parr@theengineeringtrust.org</a>
Head of Delivery	Rob Alderman: 01993 882008, 07807 348442 email: <a href="mailto:r.alderman@theengineeringtrust.org">r.alderman@theengineeringtrust.org</a>
Head of Academy	David Rees: 01993 882008, 07500 740552 email: <a href="mailto:d.rees@theengineeringtrust.org">d.rees@theengineeringtrust.org</a>
Head of Quality, Risk & Compliance	Anthony Melia: 01993 882008, 07415582428 email: <a href="mailto:a.melia@theengineeringtrust.org">a.melia@theengineeringtrust.org</a>
Designated Safeguarding Lead (DSL)	Mark Vingoe: 01993 882008, 07939 296280 email: <a href="mailto:m.vingoe@theengineeringtrust.org">m.vingoe@theengineeringtrust.org</a>

b) External Contacts

Organisation	Contact
ESFA Service Desk	0800 0150600 / <a href="mailto:helpdesk@manage-apprenticeships.service.gov.uk">helpdesk@manage-apprenticeships.service.gov.uk</a>
IT Support (Phantasia)	0207 0429199 / <a href="http://www.phantasia.net">www.phantasia.net</a>
OneFile Support	0161 6383876
Xero Support	<a href="http://xero.com">xero.com</a> / <a href="#">Visit contact page</a>
HSE (if workplace incident)	Contact Centre - 0345 300 9923
ICO (if data breach)	ICO Helpline 0303123 1113

**6) Risk Identification and Business Impact Analysis**

- a) Business continuity is underpinned by proactive risk management.
- b) ETT will conduct a formal Business Impact Analysis annually, which will identify:
  - i) Critical activities (e.g. teaching, assessment, ILR returns, payroll, safeguarding) i.e. the things we absolutely must keep running no matter what.
  - ii) How long we can afford for each activity to be down before it causes serious problems for learners, employers, subcontractors, funding or compliance.
  - iii) The minimum resources required to maintain each activity (staff, equipment, systems, premises)
  - iv) Dependencies on third parties (subcontractors, IT providers, Awarding Bodies, EPAOs) i.e. Which external organisations we rely on to deliver our service, and what happens if they let us down

#### 7) Core Tools and Infrastructure for Continuity

- a) ETT's blended delivery model and cloud-based infrastructure provide inherent resilience.
- b) All critical systems have Service Level Agreements (SLAs) for uptime and data recovery. Key data is backed up off-site via third-party providers.
- c) The following tools and systems underpin our continuity capability.

Tool / System	Purpose	Continuity Feature
OneFile (e-portfolio)	Learner records, assessment, OTJ tracking	Cloud-based, accessible remotely
Microsoft Teams	Virtual learning, meetings, coaching	Accessible remotely, works across devices, staff have laptops/ mobiles/ tablets
Xero	Finance, management accounts	Cloud-based, accessible remotely
ETT Website	Public communications, emergency updates	Hosted externally, can be updated remotely
Third-party systems (subcontractor college systems)	Learner management	Reliance on subcontractor continuity plans – Under review

#### 8) Incident Response Framework

- a) Please see ETT EAP for response to critical incidents.
- b) The below section shows procedure for each scenario.
  - i) Trigger: The event that activates the procedure
  - ii) Immediate Actions: Steps to be taken within the first 24-72 hours

- iii) Recovery Actions: Steps to return to business as usual
- iv) Communication: Who needs to be told and by whom
- c) Learner Delivery Disruption (ETT-caused)
  - i) Trigger: Loss of Training Officer/Lecturer, inability to access delivery premises, or other internal failure preventing delivery.
  - ii) Immediate Actions (Depending on the nature of the issue):

Action	Owner	Timeline
Follow EAP if a significant incident. If EAP not enacted, notify relevant SMT colleague(s)	Anyone identifying incident	a.s.a.p. Within 12 hours
Identify all affected learners and their current status. Priority to be given to those most imminent (e.g. booked in that day, if no notice) and learner wellbeing	Head of Delivery / Training Officer(s)	Within 24 hours
Review remaining staff caseload and redistribute affected learners on a temporary or permanent basis (where applicable)	Head of Delivery	Within 72 hours
Identify any classroom-based elements that must be covered by another colleague	Head of Academy	Immediate to 1 week

iii) Recovery Actions

Action	Owner	Timeline
Initiate recruitment process for permanent replacement (if applicable)	CEO / DDO	Within 1 week
If staff absence >4 weeks, ensure coverage by staff to manage caseloads	DDO/ Head of Delivery / Head of Academy	Immediate to Week 3 of absence
If premises lost, activate remote working protocol and source alternative accommodation. ETT insurance covers temporary alternative facility for up to 12 months.	CEO/Director	Within 1 week

Action	Owner	Timeline
Update learner records to reflect any changes in delivery patterns	Operations Team & Admin Team.	Ongoing

iv) Communication:

- (1) Learners and Employers: DDO / Head of Delivery / Training Officers
- (2) ETT Staff: CEO/DDO
- (3) DfE/DWP (if funding impact likely): CEO
- (4) Awarding Body / EPAOs (if qualification impact likely): Head of Delivery / Head of Quality, Compliance and Risk

d) Learner Delivery Disruption (Employer-caused)

- i) Trigger: Employer ceases trading, is unable to support off-the-job training, withdraws from programme, or experiences significant disruption (e.g. site closure).
- ii) Immediate Actions:

Action	Owner	Timeline
Learner contacted to explain process, options, and complete safeguarding check	Training Officer(s)	Within 48 hours
Employer contacted to understand situation and explore reinstatement potential	Head of Delivery / DDO	Within 48 hours
Assess learner's progress and proximity to EPA	Head of Delivery / Training Officer(s)	Within 1 week

iii) Recovery Actions:

Action	Owner	Timeline
If learner is close to EPA, explore intensive support to complete	Head of Delivery / Training Officer(s)	Immediately
If learner requires new employer, commence support to help achieve this	DDO / Admin Team	Within 1 week
Notify DfE/DWP of any change in learner circumstances or transfer	Finance and Apprenticeship	As per funding rules

Action	Owner	Timeline
	Funding Co-ordinator / CEO	

iv) Communication:

- (1) Learner: Training Officer (ongoing support)
- (2) Employer (if still trading): Head of Delivery / DDO
- (3) DfE/DWP: Finance and Apprenticeship Funding Co-ordinator / CEO

e) Loss of Key Personnel

- i) Trigger: Sudden loss of any staff role due to resignation, illness, or other circumstances that leaves a critical function uncovered. Covering is a temporary measure only (maximum 4 weeks). Beyond this, a formal interim or permanent solution should be implemented.
- ii) Immediate Actions:

Action	Owner	Timeline
DDO and CEO notified. SMT convene and determine if role is critical to delivery or compliance.	DDO	Within 24 hours
Access to all systems for departed staff member revoked	CEO/DDO	Within 24 hours
Data from departed staff member backed up and reassigned	CEO/DDO	Within 48 hours
Internal communication to staff regarding change and interim arrangements	CEO	Within 48 hours

iii) Recovery Actions (Short-term: Weeks 1-4):

Action	Owner	Timeline
Distribute workload of departed staff among remaining team	SMT	Within 1 week
Prioritise statutory visits, safeguarding contacts	Head of Delivery / Training Officers	Ongoing

Action	Owner	Timeline
SMT to monitor team capacity and wellbeing weekly	SMT	Weekly

iv) Recovery Actions (Medium-term: Week 4+):

- (1) If permanent recruitment is not concluded within 4-8 weeks, the DDO/Line Manager will review one or more of the following options:

Option	Considerations
Restructure responsibilities among existing team	Capacity, skills, wellbeing impact
Engage associate/temporary staff	Cost, availability, induction time
Outsource specific functions	Viability, data protection, cost
Temporarily reduce intake	Impact on revenue, DfE/DWP position

v) Specific Role Cover Arrangements (Temporary only):

Role	Temporary Cover Arrangement
Training Officer	Remaining Training Officers, Head of Delivery
TESA Lecturer	Remaining lecturing team, Head of Academy, DDO, Training Officers
Head of Delivery	DDO, Head of Quality, Compliance and Risk
Head of Academy	DDO, Lecturer(s), Head of Quality, Compliance and Risk
Director of Delivery & Operations	CEO, Head of Delivery, Head of Quality, Compliance and Risk
Accountant	Temporary accountant engaged for Xero/payroll (payroll outsourced)
Finance and Funding Coordinator	Accountant, Head of Quality, Compliance and Risk, CEO
Operations Admin Lead	DDO, Operations Administrator

Role	Temporary Cover Arrangement
Chief Executive	Trustees direct DDO until replacement recruited
Head of Quality, Compliance and Risk	CEO, DDO, Head of Delivery, Curriculum Lead

vi) Communication:

- (1) Internal Staff: CEO/DDO
- (2) Learners (if impact on delivery): Head of Delivery/DDO
- (3) Employers (if impact on delivery): Head of Delivery/DDO
- (4) DfE (if role impacts funding compliance): CEO/ Finance and Funding Coordinator/ Head of Quality, Compliance and Risk

f) Loss of Premises

- i) Trigger: Fire, flood, power outage, gas leak, chemical incident, or other event rendering ETT business premises unusable.
- ii) Immediate Actions

Action	Owner	Timeline
Follow EAP if a significant incident. If EAP not enacted, notify relevant SMT colleague(s).	See EAP	Immediate
Activate remote working protocol (if applicable). All staff directed to work from home.	CEO/DDO	Within 4 hours
Assess nature of incident and estimated duration of disruption	CEO/DDO	Within 24 hours

iii) Recovery Actions:

Action	Owner	Timeline
Contact insurer and begin claims process.	CEO/ Finance and Funding Coordinator	Within 48 hours
If premises unavailable >1 week, source temporary serviced office space (if applicable)	CEO/DDO	Week 1+
Assess learner access to equipment; arrange temporary alternatives if needed	DDO/ CEO /Head of Delivery	Within 1 week

Action	Owner	Timeline
Update website with situation update, contact and service information.	CEO/DDO	Within 24 hours

iv) Communication:

- (1) Staff: CEO/DDO (regular updates)
- (2) Learners: Head of Delivery / Training Officers
- (3) Employers: Head of Delivery/DDO
- (4) DfE/DWP (if significant disruption): CEO/DDO
- (5) Public: Website page

g) Loss of IT Systems or Cyber-Attack

- i) Trigger: Ransomware, malware, system failure, data breach, or loss of access to critical cloud platforms (OneFile, Xero, email, etc.).
- ii) Immediate Actions

Action	Owner	Timeline
CEO/DDO notified	Depends on which system is compromised	Within 1 hour
3 <sup>rd</sup> party system owner contacted	CEO/ DDO/ SMT	Within 1 hour
If cyber-attack suspected, isolate affected systems and do not restart	System Owner / CEO / DDO	Within 1 hour
If cyber-attack, contact insurer – ETT has cyber cover and their experts support in any resolution	CEO	Within 1 hour
Assess scope: Which systems are affected? Is data compromised?	System Owner / CEO / DDO	Within 4 hours
If data breach suspected/confirmed, begin data breach reporting procedure (see GDPR policy)	CEO/ DDO/ Head of Quality, Compliance and Risk	Within 24 hours

iii) Recovery Actions

Action	Owner	Timeline
Engage system owner to verify data integrity and restore access	CEO/ DDO	Ongoing
Implement disaster recovery plans per provider SLAs	System Owner / CEO / DDO	As per SLA
If systems down >24 hours, implement low-tech continuity measures: <ul style="list-style-type: none"> <li>• Telephone Training Officers/Lecturers</li> <li>• SMS/WhatsApp updates to learners</li> <li>• Paper-based work where possible</li> <li>• Prioritise learner contact and wellbeing checks</li> </ul>	DDO / Head of Delivery	Day 2+
Conduct post-incident review and update security measures	System Owner / CEO / DDO	Within 1 month

iv) Communication

- (1) Staff: CEO/DDO (regular updates via alternative channels if email down)
- (2) Learners: Head of Delivery / Training Officers (via phone/SMS)
- (3) Employers: Head of Delivery/DDO (via phone)
- (4) DfE/DWP (if data breach or significant disruption): CEO/ DDO
- (5) Awarding Bodies / EPAOs (if data breach or significant disruption): CEO / Head of Quality, Compliance and Risk, DDO, Head of Delivery
- (6) Information Commissioner's Office (if personal data breach): CEO / DDO (within 72 hours)

h) Financial or Regulatory Disruption

- i) Trigger: Significant funding cut, DfE/DWP audit clawback, late payment from DfE/DWP, change in government policy impacting viability, or other financial shock.
- ii) Immediate Actions

Action	Owner	Timeline
CEO notifies Trustees and SMT (if not already aware)	CEO/DDO	Within 48 hours

Action	Owner	Timeline
Engage with DfE/DWP Account Manager to understand situation and explore options	CEO/DDO	Within 1 week
Review cashflow forecast and identify immediate cost-containment measures	Accountant / CEO	Within 1 week

iii) Recovery Actions

Action	Owner	Timeline
Develop recovery plan with Trustees, including potential draw on reserves. Recovery plan will detail expected income/expenditure and cashflow to ensure liquidity. Timeline vs cashflow will be established and decisions made in terms of ensuring the business can continue to trade.	CEO / Trustees	Within 2 weeks

iv) Communication

- (1) Trustees: CEO
- (2) Staff: CEO (as appropriate)
- (3) DFE/DWP: CEO
- (4) Employers, Learners (if significant impact): CEO / DDO / Head of Delivery

i) Subcontractor Failure

- i) Trigger: Subcontractor (college provision) is temporarily or permanently unable to deliver their portion of the programme.
- ii) Immediate Actions

Action	Owner	Timeline
Notify SMT / Line Manager	Any staff	Within 24 hours
Identify all affected learners and their current status	Head of Delivery / DDO / Head of Quality, Compliance and Risk	Within 48 hours
Contact subcontractor to understand nature and duration of issue	CEO/ DDO/ Head of Delivery	Within 1 week

Action	Owner	Timeline
If temporary issue, arrange for ETT staff to maintain learner contact and progress visits	Head of Delivery / DDO	Within 1 week
If permanent issue, review subcontractor agreement and trigger relevant clauses	DDO/ Head of Quality, Compliance and Risk	Within 1 week

iii) Recovery Actions:

Action	Owner	Timeline
If subcontractor unable to rectify within reasonable timeframe, identify alternative provision	DDO/ CEO	Within 2 weeks / Relevant period
Inform affected learners and employers of changes and reasons	Head of Delivery/ DDO	Within 2 weeks / Relevant period
Make relevant amendments to apprenticeship paperwork	Operations Team	Within 1 month / When in place
Update ILR and notify DfE/DWP if funding affected	Finance and Apprenticeship Funding Co-ordinator / CEO / Head of Quality, Compliance and Risk	As per funding rules

iv) Communication:

- (1) Learners and Employers: Head of Delivery / DDO
- (2) Subcontractor: CEO/ DDO / Head of Quality, Compliance and Risk
- (3) DfE/DWP (if funding impact): Finance and Apprenticeship Funding Co-ordinator/ CEO

**9) Communication and Welfare**

- a) Internal Communication

- i) During a significant incident, the CMT/SMT or CEO will provide regular updates to all staff:
  - (1) Initial update within 24 hours
  - (2) Minimum weekly update thereafter for the duration of the incident
  - (3) A dedicated Microsoft Teams channel will be used for operational coordination where appropriate
- b) Learner and Employer Communication
  - i) Learners and employers will be contacted within 48 hours of any incident that affects their programme
  - ii) Updates will be provided at least every two weeks for ongoing incidents
  - iii) The website emergency page [www.theengineeringtrust.org](http://www.theengineeringtrust.org) will be activated within 24 hours of a major incident, providing clear contact information and service status
- c) Stakeholder Communication
  - i) The CEO or CMT/SMT will notify the following stakeholders within 5 working days of any incident that may impact funding, qualification delivery, or regulatory compliance:
    - ii) DfE/DWP Account Manager
    - iii) Relevant Awarding Bodies / EPAOs
    - iv) Trustees
- d) Welfare
  - i) The Designated Safeguarding Lead (DSL) will coordinate wellbeing checks for any learner or staff member identified as vulnerable during the disruption
  - ii) Mental Health First Aiders will be signposted to staff and learners as needed
  - iii) Staff wellbeing will be monitored by line managers and the CMT/SMT throughout any prolonged incident

#### 10) Testing, Review, and Continuous Improvement

- a) All lessons learned from testing or real incidents will be used to update this policy and improve ETT's resilience.

Activity	Frequency	Owner	Outcome
Business Continuity Policy review	Annually	Head of Quality, Compliance and Risk	Updated policy approved by CEO
Business Impact Analysis	Annually	Head of Quality, Compliance and Risk	Updated risk assessment

Activity	Frequency	Owner	Outcome
Post-incident review	After any real incident	Head of Quality, Compliance and Risk	Lessons learned report to CMT/ SMT and Trustees