

Policy & Procedure	Business Continuity
Policy Area	Finance and Estates
Version Number	05
Approving Committee	Audit and Risk Committee
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Responsible Senior Manager	Director of Finance and Estates

Policy Statement

To meet the College's objectives and ensure continuity of its operations and plan for the recovery / renewal of services in the event of serious disruption.

Associated Policies/Procedures

Where applicable Procedures associated with observing the policy are contained within this policy document, listed below and available on the below link on the Staff Intranet. Template documents associated with this policy are also located in the Forms section of the Staff Intranet.

<https://intranet.westcollegescotland.ac.uk/reference/SitePages/Policies%20and%20Procedures.aspx>

Equality Statement

The College is committed to providing equal opportunities to ensure its students, staff, customers and visitors are treated equally regardless of gender reassignment, race, religion or belief; disability; age; marriage and civil partnerships; pregnancy and maternity; sexual orientation; sex.

Please note this document is available in other formats, to request another format please email info@wcs.ac.uk

History of Amendments

Date	Version/Pages/Sections Affected	Summary of changes
06/02/2018	Version 1	
06/05/2021	Version 2	
08/12/2021	Version 3	New policy template
March 24	Version 4	Review by VP Operations
February 26	Version 5	Review by Director of Finance

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Scope

This document applies to all services within all the West College Scotland (the College) sites. Each faculty/department will formulate their own Business Continuity Plan (BCP), considering this document and associated guidance. Subject to approval by the appropriate Senior Leadership Team (SLT) Each faculty/department may exclude parts of their operations that they consider falling outside of the scope of their BCP's, provided that, such exclusions are documented and do not negatively impact on the College's ability to deliver its services.

This Policy does not seek to replace or supersede existing relevant policies or planning (e.g., site specific) documents. Instead, it advocates the use of existing risk registers and appropriate incident reporting mechanisms and will link closely with the College's emergency preparedness activities.

Introduction

The aim of having a Business Continuity Management System (BCMS) is to ensure that the College can maintain its activities in the face of disruptive challenges. Therefore, all faculties/departments are expected to prepare, exercise, maintain and review BCP's based on the principle that each faculty/department should be able to maintain its own critical activities which are key to contributing to the strategic intention of the College.

This Policy defines a broad framework for the implementation of the College's BCMS to minimise the impact of business disruption. Full compliance with this Policy will ensure procedures exist for recording, assessing, and managing business continuity risk; identifying and prioritising essential activities; responding to business disruptions or incidents, regardless of cause and maintaining essential services or restoring services to a minimum acceptable level.

Principles

The College's business continuity planning is devised to deal with the impact(s) of an event/situation/disruption as opposed to addressing the potential causes and such business continuity arrangements are crucial to the successful management of the College.

The strategic responsibilities for BC rest with the Vice Principal Operations and are governed by the SLT, however, viability of the College's BCMS is determined by the commitment and ownership demonstrated by the various services.

The College's SLT, through the Director of Finance and Estates (DFE) will ensure that BCPs are reviews at least annually, or earlier if subject to significant change and that any new system or activity has documented BC procedures that augment wider faculty / department planning.

The College, through the Vice Principal Operations / DFE, will provide adequate training as well as testing and exercising to validate its plans at regular intervals to ensure awareness of the requirements of this Policy.

On completion of BCPs, they should be stored securely with both an electronic and hard copy available locally as well as utilising existing software within the business continuity portal of the College Intranet and properly version controlled by the DFE.

BC planning is a dynamic, iterative, composite process, which allows for further development and adaptation as circumstances change or risks evolve.

Strategic BCM Aim

To develop, implement and manage a robust and effective BCMS to protect College operations, including its staff, students, visitors, and contractors were reasonably practicable.

Strategic BCM Objectives

The College's strategic business continuity objectives are to:

- Provide a framework for the development, implementation and monitoring of a Business Continuity Management System (BCMS)
- Identify, assess and minimise business continuity risk
- Ensure that the BCMS adequately addresses planning, processes, training and continuous improvement to manage disruptions that may affect the College or its interests
- Support the delivery of the College Corporate Plan
- Safeguard the College's reputational integrity
- Raise awareness of Business Continuity and the interdependencies between teaching and support services

Statement of Intent

The College is committed to developing, implementing and managing a robust and effective BCMS as a key mechanism to:

- Ensure that a formal, consistent, co-ordinated and cost-effective approach to the continuity of its teaching and support activities within the education environment
- Identify the critical activities of its business via robust Business Impact Analysis (BIA) and risk assessment
- Protect, maintain and recover business critical activities as recognised in relevant BIA
- Develop BC plans to ensure continuity of activities at a minimum acceptable level and within specified timeframes
- Develop a culture of Business Continuity Management that feeds into the

College's planning and management processes

- Maintain the confidence of staff, students, other key stakeholders and visitors
- Protect and uphold the reputation of the College and manage an up to date and relevant BCMS

The SLT, through the leadership of the Vice Principal Operations, will endorse and drive the development of a strong BC culture, which is an essential ingredient to providing an effective BCMS.

The College, through the Vice Principal Operations / DFE, will implement a programme of training, exercises, maintenance and review, which will be delivered through an annual work plan.

Vice Principals, Assistant Principals and Directors will ensure that nominated Business Continuity Coordinators maintain BC plans (based on a standard template) for critical activities within their areas of responsibility.

The coordinators will maintain and review BC Plans including the Business Impact Analyses on an annual basis or sooner if significant change is required due to circumstances.

All staff who are expected to respond to a disruption, working for and on behalf of the College, must be aware of the BCP appropriate for their areas of business and their role in preparation for an event/disruption.

Roles and Responsibilities

This section outlines the roles and responsibilities for relevant staff in respect of BCM.

Principal

The Principal has overall responsibility for Business Continuity Management within the College however delegates this Strategic responsibility to the Vice Principal Operations to ensure implementation of this Policy throughout the College estate.

Senior Leadership Team (SLT)

The Senior Leadership Team (SLT) will:

- Ensure appropriate structures are in place to implement effective Business Continuity arrangements
- Monitor the implementation of this Policy
- Raise issues of resource necessary for the adequate control of severe BC risks at the appropriate budgetary forums.

Vice Principal Operations / Director of Finance and Estates

The Vice Principal Operations, or Director of Finance and Estates in their absence, have tactical and operational responsibility to implement the requirements of this Policy and ensure that:

- The SLT is provided with reasonable assurance or is kept informed of any significant business continuity risks and any associated significant developments, concerns or issues
- There is specialist advice on business continuity matters and that this is available to relevant College staff
- There is appropriate documentation identifying the Policy and guidance
- Financial support is available if BC arrangements are invoked in conjunction with the Head of Finance
- Facilitate provision of specialist advice and guidance on BCM issues including the coordination, development, implementation and review of BC plans, processes

and procedures

- Provide accessible reference data by way of the College intranet
- Meet with identified faculty/department representatives to establish routine and structure, as well as the review of business impact analysis and plans on an annual basis when necessary
- Work in partnership with Head of Campus Operations were necessary to risk assess current and future threats identified through horizon scanning and intelligence gathering
- Coordinating annual update of departmental BC plans
- Embed a Business Continuity culture through communication and the provision of awareness sessions, training and exercises to staff, according to their roles and needs
- Facilitate training, tests and exercise
- Audit compliance of BC plans
- Provide recommendations and other management feedback as appropriate
- Represent the College in the wider education business continuity arena

Local Continuity Management Teams

As part of the planning and response arrangements for any incident, which invokes the BC plans, critical business steam representatives and coordinators roles will be nominated by the SLT.

Having taken part in the preparation of Business Impact Analysis. These individuals will form the teams which will enact the BC response when an incident occurs. They will also conduct the annual review of arrangements pertinent to their area.

Incident Management Team (IMT)

Upon the occurrence of a disruptive event, involving wider consequences across the College estate, it may be necessary to escalate the response. The College IMT, whose representatives are pre-determined from across the College services, will convene to provide leadership, coordination, communication and decision making during multi-agency coordination of emergency response.

A nominated individual will be identified by the Leader of the IMT to represent the College during multi-agency coordination of emergency response.

Incident Reporting and Debriefing

Business continuity incidents should be reported if the appropriate criteria is met (criteria for reporting is contained within the associated guidance manual) and debriefs should be coordinated by the leader of the IMT to ensure that learning and review informs continuous improvement.

Insurance

As part of the Risk Assessment, development, implementation and review of business continuity plans any decision to treat, tolerate, terminate or transfer risk for indemnification purposes must be documented and appropriate consultation sought with the Director of Finance and Estates.

Procurement

The College has a number of suppliers and partners upon whom it relies on to provide a continued service. In order to minimise any risk of disruption, by failure to supply a product or service, suppliers and partners identified as critical in the relevant Business Impact Analysis will be requested to provide assurances that they have BC arrangements in place.

Those responsible for commissioning or procuring goods or services from external suppliers should consult the Procurement Manager to ensure contracts and/or service level agreements contain the appropriate clauses in respect of business continuity.

Governance

The Senior Leadership Team (SLT) will convene annually to oversee the implementation and monitoring of the College's BCM Policy. This group will be chaired by the Vice Principal Operations and will be supplemented by staff from cross-College operations as required.

The organisation has set out clear Recovery Point Objectives (RPOs), so everyone understands how much data loss is acceptable in the event of a disruption, see also operational plans. This helps teams prioritise what systems need the most frequent backup of files and ensures that recovery expectations are realistic and agreed.

Training, Awareness and Exercising - Maintenance and Review

BC plans are to be validated at regular intervals to determine whether any changes are required to procedures and responsibilities. Planned review periods should not exceed 12 months.

The Vice Principal Operations / Director of Finance and Estates will:

- Develop and source a suitable programme of training in BCM and BC risk management
- Identify appropriate levels of training and awareness for staff, to enable cascade through their areas of activity to affect a strong BC culture across the College

- Organise exercises of the BC plans and advise on local exercising arrangements
- Prepare and monitor the annual resilience work/action plan

Cyber / Terrorist Attack / Martyn's Law

A cyber-attack or terrorist threat poses a significant risk to the continuity of College operations, potentially disrupting critical systems, compromising sensitive data, and impacting the safety of staff, students, and visitors. In the event of such an incident, the College will activate its incident response and communication protocols, isolate affected systems or areas, and work with relevant authorities to assess the threat, contain the impact, and restore essential services. Maintaining robust cybersecurity measures, physical security controls, and clear escalation procedures is essential to ensuring the College can respond quickly, protect its community, and resume normal operations as safely and efficiently as possible.

IT already maintains a separate disaster recovery and backup plan, which outlines the technical processes for restoring systems and data. The technical detail remains within IT's own plan.

Martyn's Law (the Terrorism (Protection of Premises) Bill) introduces a strengthened duty for organisations to enhance public safety by improving preparedness for, and resilience to, potential terrorist incidents. In line with this legislation, the College will ensure proportionate security measures are in place across all campuses, including risk assessments, staff awareness, incident response planning, and clear evacuation and lockdown procedures. Compliance with Martyn's Law supports the College's wider business continuity arrangements by ensuring that staff and students are better protected, that emergency actions can be taken swiftly and effectively, and that the organisation is equipped to respond to and recover from a terrorism-related incident with minimal disruption to critical operations.

Monitoring

The organisation will carry out an annual simulation exercise alongside our insurance providers, to test how well the BCP works in real conditions. A planned exercise allows teams to walk through the steps, identify gaps, and make improvements before a real incident occurs.

This Policy will be reviewed annually and taken through the Senior Leadership for consideration before moving through Board and Committee governance. The College will commission additional work or change the monitoring arrangements to meet the organisational needs.

Appendix A – Definitions

Business Continuity Management System (BCMS)

An ongoing Management and Governance process supported by the College Senior Leadership Team (SLT) and appropriately resourced to implement and maintain Business Continuity Management.

Business Continuity Management (BCM)

The holistic management process that identifies potential threats to the College and provides a framework for building resilience and the capability for an effective response that safeguards the interests of its Colleges and services, reputation and value creating activities.

Business Continuity (BC)

The capability for the College to plan for and respond to incidents and business disruptions in order to continue business operations at an acceptable predefined level.

Business Continuity Incident (BCI)

An event or occurrence that disrupts an organisation's ability to deliver normal service and where contingency arrangements are required to return them to an acceptable level.

Business Continuity Plan (BCP)

A clearly defined, documents and predetermined plan for use when business operations are disrupted by an event. Typically, the plan covers loss of premises, information, people, stock or other technologies.

Business Impact Analysis (BIA)

The process of analysing business activities which support wider organisational products and services, determining threats and risks and the effect business disruption may have on organisational viability.

Risk

Identification of potential vulnerability-based likelihood and impact.

Risk Assessment (RA)

The overall process of risk identification, analysis and evaluation.

Maximum Tolerable Period of Disruption (MTPD)

The point at which an organisations viability will be irrevocably threatened if the critical activities cannot be resumed.

Recovery Time Objective (RTO)

The target time for the resumption of a critical activity after an event.