

**Business Continuity Policy**

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# Introduction

The purpose of the policy is to enable the Trafford College Group’s Leadership Team to identify potential threats to its employees, students, operations, delivery capabilities and the associated impacts that these threats, if realised, might cause.

The Business Continuity Policy (BCP) provides a framework for building organisational resilience with the capability for an effective response that safeguards the interests of key stakeholders, reputation, brand and value-creating activities.

The BCP defines why and how business continuity is established, maintained and improved. The BCP defines the governance process ensuring top management commitment and involvement with business continuity.

## Application

## All Trafford College Group employees and those working under contract to the Trafford College Group must be aware of and are required to comply with this policy.

## Purpose

The Trafford College Group’s BCP ensures:

* An active and adequate BCP is established, resourced and maintained in alignment with stakeholder requirements.
* Business impact analysis and risk assessment processes will regularly be applied to identified processes and activities, supporting resources and interdependencies.
* Incident response, business continuity and IT disaster recovery plans will be developed to ensure continuity of key services at a minimum level and within specific timeframes following a disruption to operations, IT services or supply chain.
* Invocation of response plans and communications with our customers and clients can be managed by identified leadership using agreed protocols.
* Plans are subject to regular ongoing exercising and revision.
* The senior leadership team can be assured that the BCP remains up to date and relevant and that processes are identified and followed for testing and improvement.
* Suppliers provide assurance around business continuity arrangements as required.
* Employees and contractors are trained and communicated with to ensure the competence of all personnel with identified BCP responsibilities.

## BCP Responsibilities

* The BCP is approved by the Board of the Corporation and reviewed on annual basis.
* The Principal/Chief Executive is responsible to the Board of the Corporation for all matters relating to Business Continuity.
* The BCP is owned by the Principal/Chief Executive.

## 1.4 Trafford College Group BCP - Policy Statement

The Principal/Chief Executive is responsible to the Board of Corporation for ensuring the implementation, management and improvement of Business Continuity at the Trafford College Group.

Objectives in respect of Business Continuity for the Trafford College Group are to protect the safety of employees, contractors and students, identify and manage threats to the organisation that may disrupt operations, reduce the risk of occurrence of disruptive events and ensure adequate procedures are in place to facilitate recovery of identified key activities within required recovery timescales.

The Vice Principal Corporate Services and Planning takes on the role of Business Continuity Director (BCD).

The BCD together with representation from the Group’s leadership team form a Business Continuity Team (BCT). The BCT is responsible for the development and implementation of Incident Response and IT Disaster Recovery plans. The purpose of the plans is to ensure that the Trafford College Group is capable of maintaining a minimum acceptable standard of service delivery and that associated support services are maintained for identified critical activities.

A periodic review of business continuity requirements takes place to ensure adequate identification of critical activities, priorities and required mitigations for identified risks is in place and effectively managed.

Business continuity plans are reviewed and tested annually. Any required modifications are identified via a corrective actions and improvement process.

Guidance on all responsibilities and document specifications is contained within the BCP.

The BCD appoints a BC Coordinator who will both monitor and support the implementation, testing and management review process to ensure continual improvement and development in line with the BCMS.

All staff are made aware of the existence of the BC Policy and those with a direct role in the implementation or response to an incident are provided with required information and guidance.

Signature:

Graham Luccock Chair of Corporation Date:

Signature

James Scott

Principal/Chief Executive

Date:

# SCOPE & OBJECTIVES

## Context of the Organisation

The Trafford College Group is a leading provider of education and training services in Greater Manchester. Operating from three main campuses (Altrincham, Stockport and Talbot Road) and employing around 700 staff, the Trafford College Group provides services to a student population of around 8,000. The Group has recently made the commitment to make a significant investment of circa £24m in its infrastructure and has awards for achievement in respect to delivery of its services.

The Group offers a wide range of education and training in the following curriculum categories:

* 16 – 18 full and part time
* Apprenticeships
* Adult Courses
* Higher Education
* Business Training

The executive leadership team encompasses the following roles:

* Principal/Chief Executive
* Deputy Principal Curriculum (vacant)
* Director of Finance and Strategy
* Vice Principal Corporate Services and Planning

In addition to providing learning and training services the Group also operates (on campus) at Altrincham and Stockport the following facilities:

* Bar & Restaurant\*
* Salon and Spa\*

\*Open to general public term times

##  Business Continuity Objectives

The Trafford College Group BCP supports the achievement of the following objectives;

* Protect the safety of employees (contractors), students and visitors.
* Manage the threats and impacts associated with an interruption to critical operations.
* Identify the maximum downtime tolerance for key services
* Reduce business continuity risk via:
	+ A proactive control environment (decrease the likelihood of a disruptive event);
	+ Strategies to respond to a disruptive incident;
	+ Plans to recover critical business activities within stakeholder expectations; and
	+ The ability to maintain communication with stakeholders as required.
* Provide assurance to interested stakeholders of the effectiveness of BC arrangements.

## BC Team

* The Vice Principal of Corporate Services and Planning is the lead focal point for Business Continuity within the Trafford College Group, the Vice Principal Corporate Services and Planning appoints a BC Coordinator.
* The BC Coordinator will develop the BCP in line with industry best practice and the needs of The Trafford College Group. They will both manage and monitor the implementation and adoption as well as ensure compliance with the BCP.
* The Vice Principal Corporate Services and Planning will carry the title of Business Continuity Director (BC Director) and appoint the following:
	+ A deputy to ensure fulfilment of his/her duties as BC Director at all times.
	+ A Business Continuity Team (BCT) to assist with implementation activities and disruptive incident response. Each member of the BCT will in turn appoint a deputy to ensure fulfilment of duties at all times.
* The BC Director or his/her designee is authorised to invoke Business Continuity / IT Disaster recovery in accordance with the protocols set out in the regional documentation.
* The Health and Building Safety Officer will carry the title of BC Coordinator.
* The Director of Premises will carry the title Deputy BC Director.

## Scope of the BCP

As it matures the BCP will ultimately be applicable to all the Trafford College Group operations identified as being key to meet business objectives.

Outsourced services, where identified as critical, are included in risk identification and mitigation processes as required.

# Implementation Planning

## Implementation Cycle

The implementation of business continuity is done in alignment to a continuous improvement cycle.

Key activities associated with each cycle are summarised as follows;

|  |  |
| --- | --- |
| Cycle | Key Activities |
| Plan | Annual review and revision of the BCP (including BC Policy Statement)Review and alignment of current BCMS requirements to organisation priorities |
| Do | Achievement of BCP objectives. |
| Check | Annual review of achievement of BCP objectives. |
| Act | Tracking and monitoring of identified non-conformities, corrective actions and improvement activities. |

## Achievement of Business Continuity Objectives

The objectives are mapped against the Business Continuity framework as follows:

| Business Continuity Objective | Achieved via |
| --- | --- |
| Protect Safety of employees (contractors), students and visitors | Incident Response Plan |
| Managing the threats and impacts arising as a result of an incident / disruption | Incident Response PlanIT Disaster Recovery Plan |
| Identifying the maximum downtime tolerance for key products and services | Business Impact Analysis |
| Appropriate and proactive control environment | Risk Management Process |
| Strategies to effectively respond to a crisis | Business Impact Analysis Review |
| Plans to recover critical business activities within stakeholder expectations | Business Continuity Plan(s) |
| Ability to maintain consistent communication with employees and students | Incident Response Plan |
| Ability to provide assurance to stakeholders of the effectiveness and improvement BC arrangements | Scorecard, Audit, Management Review |

## Key Implementation Risks

Consideration of key risks associated with the implementation of the BCMS is as follows;

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Risk ID | Description | LikelihoodLowMedHigh | ImpactLowMedHigh | Mitigation |
| 001 | Conflicting / competing priorities | MED | MED | Centrally managed project with realistic timescales / objectives identified. |
| 002 | Resource availability  | HIGH | MED | Centrally managed project with realistic timescales / objectives identified. |
| 003 | Business Continuity / IT DR skills & experience (spread thinly, non-existing) | MED | MED | Centrally managed project with adequate external (specialised) resource. |
| 004 | Lack of consistency of implementation | MED | MED | Centrally managed project supported by BCMS. |
| 005 | Embedding of BCM within the organisation not achieved | MED | MED | Centrally managed project, communications plan for implementation. |
| 006 | IT DR planning not carried out in alignment with BC planning | MED | HIGH | IT identified as key stakeholder within the BIA process.  |

# Resources & Support

## Skills and Competences

A summary of competences required to establish, implement, maintain and operate the BCP is provided as follows:

|  |  |
| --- | --- |
|  Phase | Summary of Competences Required |
|  Plan | * Familiarity with standards requirements
* Initiation of and establishment of BCMS
 |
|  Do | * Business Impact Analysis / Risk Assessment
* Developing BCM response strategies
* Developing and implementing plans
* Incident Communication
* Media Training (Director of Marketing)
* Exercising plans
* Awareness / communications
 |
|  Check | * Performance Evaluation
* BC Monitoring
* BC Review
* BC Audit
 |
|  Act | * BC Review result implementation
* BC Audit Corrective action implementation
* Action planning
 |

## Awareness and Knowledge Management

In general, persons doing work under The Trafford College Groups control shall be aware of the existence of the Business Continuity Policy and trained via the implementation

### Communications

Communications and awareness activities are divided into pre-disruptive event and actions and activities to take place during a disruptive event.

#### **Pre-disruptive Activity Communications**

Business Continuity awareness will be achieved through a combination of the following measures:

* Article(s) covering introduction of key concepts of business continuity at the Trafford College Group including incident reporting and general employee self-help / awareness
* Specific advice, training and guidance on the BCMS to members of the BCT

#### **Disruptive Event Communications**

Communications to interested stakeholders (including employees).

The BCT have at their disposal a combination of the following means of communication;

* Email platform with distribution groups for all employees and other stakeholders
* SMS notification platform for employees.
* Access to Corporate Communications Team for Crisis Communications support

### Document Publication

BCMS documentation is maintained electronically and distributed as follows:

* Master Copy (BC Coordinator)
* Word to: Teams
* Hard copy maintained in all campus locations

Operation of BCMS

* The BC Co-ordinator is responsible for ensuring that the BCMS is implemented and operated in alignment with the BCP. The BC Coordinator will develop the BCP in line with industry best practice and the needs of The Trafford College Group. The BC Co-ordinator will manage and monitor the implementation and adoption as well as ensure compliance with the BCP.

Key activities for the BC Director are:

* Ensuring that the formation of Business Continuity Team
* Ensuring that there has been a Business Impact Analysis & Risk Assessment formulated
* Ensuring a Business Continuity Policy is formulated
* Ensuring that the Business Continuity Procedures are implemented
* Ensuring that a management review is carried out

## Business Continuity Team (BCT)

The Business Continuity Team will undertake the following functions:

* Communication – Director of Marketing and Customer Services
* Finance – Director of Finance and Strategy
* IT – ICT infrastructure Manager
* Pay – Payroll and Pensions Manager
* HR - Head of HR and Performance
* MIS - Director of MIS
* Student Services - Assistant Principal 16-19

## Risk Assessment

A Business Continuity risk assessment is completed by the relevant team for their areas and reviewed by the whole team after an event.

### Risk Assessment Focus

Business Continuity risks are considered in respect of;

* Staffing / Students / Visitors
* IT systems and services
* Premises related (utilities, loss of use (e.g. weather, denial of access))
* Loss of 3rd parties
* Other

### Reporting of Completed Risk Assessment

Completed BC risk assessments are reported to the Vice Principal Corporate Services and Planning. The Director of Finance and Strategy is responsible for reporting outcomes and changes on the Board Assurance/Risk management Framework.

## Business Impact Analysis

A Business Impact Analysis (BIA) review is undertaken and reviewed annually.

* Impacts should a disruption occur
* The priority for resumption of identified activities
* Resource requirements (personnel, equipment, services, IT etc.) to enable recovery
* The high-level strategy for the resumption of identified activities
* Present level of preparedness

The Business Impact Analysis is completed as follows:

* Confirm areas within scope
* Identify summary data relating to revenues/costs, headcount etc.
* Examine for each identified area the impacts of cessation of activity
* Conduct meetings with stakeholders and update the BIA resource requirement sections
* Conduct analysis of the BIA and finalise all sections including recovery strategies
* Update the Risk Register (if required)
* Review outputs with BC Coordinator on completion
* Update the ICT Infrastructure Manager with the outcomes (IT Service Recovery Requirements)

### Business Recovery Strategies

The following incident scenarios are considered:

* Site or premises disruption (denial of access, service failure, fire, flood, wind etc.)
* IT systems / services disruption
* Staff / contractor shortages owing to disruption (pandemic, travel, weather event)
* 3rd party contractor or service provider failure

The following response options are considered:

* Ensure full availability of the service i.e. no downtime tolerated
* Plan for partial recovery within an agreed recovery time objective
* Plan to transfer work to other region or external service provider
* Cease service / activity
* Do nothing
* Insure the service

## Incident Response Plan

On completion of the Risk Assessment and BIA process an Incident Response Plan is prepared.

The IRP contains the processes for:

* Identifying that an incident has occurred, see below
* Initial assessment of an incident, notifications to BCT and escalations
* Authorities, roles and responsibilities associated with the response and management of an incident
* Resources required for the support of the Incident Response
* Communication processes (internal and external stakeholders)
* The means to coordinate the business continuity responses

### Warning and Communication

The process of detecting an incident is achieved via both automated and human processes as follows:

* Environment (Weather, Flooding, Hurricane etc.). The BCT email distribution group is signed up to receive government alerts as available within the region.
* Fire / intrusion detection (automated alerts to security / fire service / management team).
* IT Server Room (flood, power, temperature), triggers an alert to ICT Infrastructure Manager (who evaluate and then escalate to BC Director as required).
* Physical incident (or potential threat including terrorist threat) identified via on-site security or employees triggers an escalation call to either facilities or BC Director as required.
* Incident impacting employees or threat notification received and escalated either via line management or direct to BC Director.

All alerts are acted upon in the same way.

The person or process identifying the issue raises the alert to the Business Continuity Director (or designee), who will evaluate and assess the potential for the incident to develop into a Business Continuity issue.

The BC Director will then act according to the guidance within the Escalation Criteria within the Incident Response Plan.

**4.6.2 Responding to an Incident**

The BC Director, will either request the BCT to meet or will issue a communication update to the BCT as required, based on the severity of the incident.

Depending on the level of the incident severity, the BC Director will alert other Group leadership as follows:

* **Level 1** Incident – no involvement unless resources or media communications required
* **Level 2** Incident – notification within 24hrs of incident or as required for resources and media
* **Level 3** Incident – notification within 1hr of incident or as required for resources and media

Once the BCT is established at the pre-agreed meeting location, each member of the BCT reporting for duty is assigned a role within the BCT team by whoever is acting as BC Director.

### Authorities, Roles and Responsibilities

The decision to convene the BCT will be taken by the BC Director (or designee) following evaluation of the potential incident. The BCT can call on various additional support functions, in the following areas:

* Legal
* Insurance
* Communications (**to be used for all Media communications*)***

All individual responsibilities and contact points are identified within the Incident Response Plan.

### Resources Required for Response

Resources required to support the BCT in coordination of their response to an incident, include:

* Meeting room
* Telephone contact details for BCT and other stakeholders (including employees)
* Incident & communications logging support (via nominated member of the BCT)
* Battle Box with hard copy documentation and other essential emergency items (see IRP)

### Communications

Managing communications is critical to demonstrating that The Trafford College Group is handling an incident effectively.

The Director of Marketing and Customer Services with support from HR will lead on all aspects of local communications.

The Director of Marketing and Customer Services and their designee must have received media skills and communications training.

The BCT will use a combination of the following media to communicate:

* Internet / Intranet (use of silent web pages)
* Email
* Telephone
* SMS (text)

Employee emergency contact details are maintained via HR.

Trafford College Group makes use of an SMS broadcast service.

Administration of the platform is managed on two levels as follows;

* Availability of the service and credits to use the service by the BC Coordinator.
* Availability of employee contact information by HR.

All employees are made aware of the following statement:

**Business Continuity Communications – Handling Media (Radio, Newspaper, TV journalists)**

With the exception of the nominated spokespersons, no other employees are to communicate with media. Unauthorised employees who speak with the media or post content to personal social media sites (e.g. Twitter, Facebook, LinkedIn, YouTube, Google+, etc.) may be subject to disciplinary action.

Key inbound and outbound communications are logged via the Communications Log.

### Coordinate Business Continuity Response

The BCT will initiate the invocation of Business Continuity plans as required, following evaluation and consideration of the incident.

Within each Incident Response Plan all Business Continuity plans are identified along with the associated Recovery Time Priority and identified contacts.

The BCT will on instruction from the BC Director contact the identified Business Continuity Lead for each recovery plan and instruct them accordingly with regards to their Business Continuity recovery arrangements i.e. provide a briefing as to the nature of the incident and response strategies.

The next section provides an overview of the Business Continuity Plans.

## Business Continuity Plans

On completion of the Business Impact Analysis, the BC Director ensures that Business Continuity Plans are developed as required in alignment to the scope of the completed Business Impact Analysis.

### Department Recovery Team

The department leader will identify named person(s) to assist with recovery as required.

The identified person(s) is identified before an incident and advised on the department recovery objectives and approach by the department manager.

###  Department Recovery Priorities

On completion of the business impact analysis identified essential services and timescales for their resumption in the event of an incident are identified. The department leader will set out priorities for recovery and the approach taken to ensure recovery.

###  Department Recovery Requirements

This section identifies recovery requirements for the department i.e. what is required to support the department in delivering its essential services; these requirements are identified before an incident takes place and provisioned on a planning basis to ensure department activities identified within the BIA are able to continue to the required level.

Requirements are identified for workplace i.e. office, work from home, work from alternate locations, Information Technology, software/business applications and other essential requirements.

###  Stakeholder Communications

Employee, student and other key stakeholder contact details are captured within this section of the business continuity plan.

The process of communication is coordinated with the BCT.

## IT Disaster Recovery Plan

On completion of the Business Impact Analysis, the BC Director ensures that the priorities for IT Systems and Services are updated and notified to the ICT Services.

The ICT Infrastructure Manager is responsible to ensure IT Disaster Recovery (DR) Plans are prepared.

Each IT DR Plan is covering the following:

* IT DR Strategy i.e. the approach, priorities and timescales for business systems recovery and their alignment to business continuity requirements (as per the BIA).
* IT DR invocation procedure detailing how local IT team are notified of an incident, their required evaluation procedures and approach for invocation if required i.e. monitoring, alerts and notifications/escalations including out of normal hours,
* Procedures detailing the actual approach for business system recovery i.e. instructions providing support for a competent technician to recover individual IT systems or services.
* Confirmation of all relevant IT system specifications (dependencies, configurations).
* Authorisations and rights of access (who is authorised to invoke IT DR and relevant business system access authorisations/account details etc.).
* Confirmation and evidence of testing (what is tested, how is tested, evidence of testing)
* Coordination and alignment of all stakeholders and 3rd parties.

## Business Continuity Testing

The BC Director is responsible for ensuring that business continuity plans remain current, are proven to be fit for purpose and relevant to the Trafford College Group business continuity objectives. Testing and review of the business continuity documentation is carried out at regular intervals as outlined within this section and the BC Policy. Testing is not about pass or fail, but ensuring that the plans work as intended and where required changes are identified ensuring that they are both noted and implemented.

### Types of testing and frequency

Business continuity tests are identified as follows:

* **Review:** a review of factual and reference information is undertaken for the identified plan or procedure i.e. employee contact details, supplier contact details are checked for accuracy.
* **Partial:** a desktop walkthrough (walkthrough vs. live rehearsal) of the identified plan or procedure is carried out with minimal disruption to operational activities.
* **Full:** a full test of the identified plan or procedure is carried out with some involvement of end users or operational activities.

IT DR tests are as defined and run in the IT Disaster Recovery plan but may from time to time be combined with Business Continuity testing.

### Testing schedule and scope

|  |  |  |  |
| --- | --- | --- | --- |
| TYPE/SCOPE | REVIEW | PARTIAL | FULL |
| Incident Response Plan | Quarterly | Annual | Annual |
| Business Continuity Plan | Quarterly | Annual | Annual |
| IT DR Plan | Quarterly | - | Annual |
| Communications Processes | Quarterly | - | Annual |

# Performance Evaluation

## Audit

An annual programme of review of the implemented BCMS is undertaken by the BC Coordinator.

Nonconformities are recorded and any required corrective actions are implemented per the Management Review and Improvement section of this document.

## Management Review

The BC Director is required to review implementation of business continuity annually or when significant changes occur to the scope of the Trafford College Group’s activities to ensure continuing suitability, adequacy and effectiveness.

**Management Review Meeting Agenda:**

* Results of audits and reviews;
* Feedback from interested parties, including independent observations;
* Techniques, products or procedures, which could be used in the organisation to improve performance and effectiveness;
* Status of corrective actions;
* Level of residual risk and acceptable risk;
* Vulnerabilities or threats not adequately addressed in the previous risk assessment;
* Follow-up actions from previous management reviews;
* Any internal or external changes that could affect business continuity;
* Recommendations for improvement;
* Testing results; and
* Lessons from incidents; and results from education and awareness programme.

**Review output:**

* A formal review of the business continuity implementation;
* Actions to improve the effectiveness of the business continuity implementation;
* Changes to: business requirements, resilience requirements, business processes, statutory, regulatory and contractual requirements;  levels of risk and/or levels of risk acceptance; and
* Resource needs; and funding and budget requirements.

Actions arising are managed via the improvement process.

## Nonconformities

Nonconformities arising as a result of either annual review or implementation activities are notified to the BC Coordinator who shall log, confirm and monitor to eliminate their cause and avoid their occurrence.

## Corrective Action

If problems (nonconformities) are encountered and corrective actions are required then these are managed by the BC Coordinator.

The BC Coordinator will ascertain the appropriate action to address the cause of this problem, with the aim of preventing its recurrence and sharing lessons learned across the wider context where relevant.

# THE Trafford College GROUP Stakeholders

| **Stakeholder** | **Expectations (Normal)** | **Expectations(Disruption)** | **Ranking(high/med/low)** |
| --- | --- | --- | --- |
| Students  | Delivery of learning services and availability of / access to support services | Minimal disruption, alternative arrangements, adequate communications. (Minimal disruption defined via interview process) | High |
| Parents/Carers | Updates on student performance & behaviour, safeguarding support | Communication & updates on H&S / Welfare as relevant | High |
| Staff (including temp) | Safe working environment, payment, leadership and communications | Safety, payment, leadership and communications | High |
| Insurer | Assets, values, H&S compliance, Fire Safety | Support to Insurer ‘loss adjuster’  | High |
| Board / Leadership Team | Regular updates on performance, governance | Regular updates on incident management  | High |
| Emergency Services | No communication necessary | Communication updates (nature and duration of the incident) | High |
| Media/Press | Regular updates on performance | Communication as per escalation criteria, all media updates handled by Director of Marketing and Customer Services  | High |
| Sub-contractors (3rd parties) | Leadership and communication, payment | Leadership and communication, payment | Med |
| Governors | Regular updates on performance, governance | Regular updates on incident management  | Med |
| Wider Community e.g. employers, colleges, universities etc. | Regular updates on performance, governance, issue management | Updates dependent on the nature and duration of the incident  | Med |
| Regulatory Community e.g. DFE, FE Guild, MP etc. | Regular updates on performance, governance, issue management | Updates dependent on the nature and duration of the incident  | Med |
| Trade Unions | Communication as usual | Communication (as required) post disruption | Med |