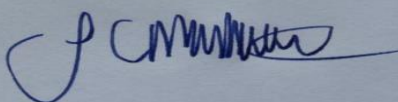




DH Associates Ltd

Apprenticeship Continuity Policy

Managing Director	Jueliya Mc Mahon	31 August 2021
		
Review Date	Senior Leadership Team	31 August 2022

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Policy Statement

DH Associates Ltd aim to ensure that it has prepared so far as is reasonably practicable, to continue to provide critical activities and an emergency response during any emergency or disruptive event.

The aim of the policy is to describe how DH Associates intends to mitigate the effect of any incident that causes a severe disruption the delivery of apprenticeships.

Assumptions used to support DH Associates planning process include the following elements.

- Emergencies or threatened emergencies can adversely impact DH Associates ability to continue to support critical activities and provide support to the operations of learners, apprentices, employers, partners and external agencies.
- When a continuity event is declared, DH Associates will implement a predetermined plan using trained and equipped personnel.
- Staff and freelance employees and resources located outside the area affected by the emergency or threat will be available as necessary to continue critical activities.
- Normally available staff members may be rendered unavailable by a disaster or its aftermath or may be otherwise unable to participate in the recovery.
- Procedures are sufficiently detailed so someone other than the person primarily responsible for the work can follow them.
- A disaster may require learners, apprentices, employers, partners and local agencies to function with limited automated support and some degradation of service, until full recovery is made.

DH Associates undertakes activities and services that must be performed, or rapidly and efficiently resumed, in an emergency. While the impact of an emergency cannot be predicted, planning for operations under such conditions can mitigate the impact of the emergency on our people, our office locations and our objectives.

Business Continuity Planning (BCP) is a good business practice and forms part of the fundamental objectives of our organisation and is part of its corporate governance regime. The threat of environment and recent emergencies has increased awareness of the need for BCP capabilities that enable services to continue their critical activities across a broad spectrum of emergencies.

DH Associates Apprenticeship Continuity Plan aims to:

- Prioritise people's safety
- Maintain essential services
- Protect buildings and their contents and sensitive information

DH Associates will develop, implement and maintain Continuity Plans to ensure that the following are achieved:

Procedures and information are maintained in readiness for use in an incident to enable DH Associates to continue to deliver its critical activities at an acceptable pre-defined level. A critical activity is defined as the actions needed to deliver key products and services in order to meet the most important and time sensitive objectives

We will prioritise and group critical activities against the following criteria;

- Priority 1 - Disruption to these activities might have an impact on our ability to deliver an emergency response on behalf of DH Associates and may result in serious damage to human welfare
- Priority 2 - Disruption to these activities might have an impact resulting in impact or breakdown of local community services, damage to the environment, loss of income to DH Associates or loss of reputation
- Priority 3 - Activities that do not fall into either of the first two categories

Regular review of the continuity requirements and plans to ensure that they reflect the needs of the business

Each service should assure itself that its key suppliers or partners which support a critical activity have effective BCM arrangements in place

DH Associates will review its continuity plan(s) at least annually or at more regular intervals dependent on the level of risk or if there has been significant change in the infrastructure of a service. Testing must take place either annually or biennially depending on the type of plan.

The MD has, overall, responsibility for ensuring that the management of business continuity is incorporated in DH Associates processes and structure. The Senior Leadership Team are responsible for ensuring that all services comply with this policy.

Communication with staff, employers, learners and suppliers will be critical. The SLT will be responsible for communication and will use appropriate methods. This will include existing information on preferred communication by staff, learners and employers. Where electronic communication is not possible communication may need to be face to face.

DH Associates will manage transportation as part of any incident. The company has access to internal fleet vehicles and can also use external contractors.

Apprenticeship Contract Specific Continuity Risks

Delivery

Contract Volume Changes

Risk: DH Associate has prepared to deliver the volumes set out in the initial contract. There is a risk that these volumes will suddenly increase, leading to the need for the rapid deployment of additional resource to cope with this increase.

Solution: DH Associates has access to qualified and trained staff in the relevant area. We also have access to a number of subcontractors and potential subcontractors. In the event that we are notified of a likely increase in volume, we will:

- Draft in staff from other contracts where this is feasible; and/or
- Instigate our capacity identification communication process to identify the most appropriate subcontractor with available resource

Likelihood of occurrence: medium

Impact of occurrence: low/medium

Subcontractor Failure

Risk: DH Associates does not currently use subcontractors. If subcontractors were necessary permission would be gained from the employer and ESFA. For example, use subcontractor organisations to ensure that both the range and volume of customer needs can be met. The selection of subcontractors will be important to ensure that a stable, flexible and varied supply chain is established. Given the current economic climate there is however a risk that a subcontracting organisation could experience performance difficulties and even insolvency, thereby leaving them unable to deliver on this contract.

Solution: DH Associates would put in place a rigorous system of subcontractor selection which investigates the financial status as well as the performance history of the subcontractor.

Likelihood of occurrence: low

Impact of occurrence: low

Financial Failure Measure

- Where a supplier is deemed to be necessary to the contract due to a specialism but has an insufficiently robust track record (for example because they are a relatively new organisation), the volumes allocated to such an organisation will be reduced and only increased on proof of performance.
- Wherever possible two contractors offering similar provision will be identified. Where necessary a 'waiting list' of subcontracting organisations will be held to ensure rapid access to pre-validated subcontractors is available.

Likelihood of occurrence: medium

Impact of occurrence: low

Performance Failure Measures

- A rigorous performance management system would be put in place in order to ensure "early warning" of performance issues. This gives DH Associates the platform to put in place remedial actions to bring the subcontractor up to standard quickly. Where relatively new subcontracting organisations are recruited, our capacity building strategy, which includes more frequent interventions and support, will be put in place.
- Wherever volumes allow two subcontracting organisations with a similar specialism will be recruited. Where projected volumes mean this approach represents poor value for money, or is unviable, every effort will be made to have a second potential provider on our "standby" or waiting list. These providers will be pre-validated in terms of their financial robustness and track record wherever possible.

Likelihood of occurrence: low to medium

Impact of occurrence: low to medium

Loss of Delivery Centre

Risk: There is a risk that a disaster could render the centre from which DH Associates delivers unusable.

Solution: In such a situation, DH Associates would divert delivery of services to another office located at the site or another site where secure login can be confirmed. These would be used while suitable replacement facilities were constructed.

Likelihood of occurrence: low

Impact of occurrence: medium

Safeguarding

Risk: The programme could involve DH Associates working with or being in contact with children, vulnerable adults and or young people. Whilst there are stringent safeguarding systems in place, there is a risk that a learner or service user may be put at risk or harmed by a member DH Associates staff, learner, colleague, visitor or employer whilst on the programme.

Solution: DH Associates has robust and stringent safeguarding policy and procedures, all learners, employers and staff have access and training on these policies. DBS checks are performed on staff prior to recruitment and update 3 yearly. Any risk identified from these are dealt with appropriately. In order to ensure that our subcontractors have the same rigour we insist on the following:

- All staff to be DBS checked and to have received safeguarding training with appropriate records being kept demonstrating this.
- Incident logs to be kept and any incidents, however minor, to be reported to the DH Associates Designated Lead Safeguarding officer.

In the unlikely event that an incident does occur the following investigation procedure will be followed:

- The details of the incident and those alleged to have been involved will be ascertained by Lead DSO.
- The members of staff alleged to have been involved will be suspended on full pay until the incident has been fully investigated and an outcome reached.
- Where appropriate the relevant authorities (DWP/Social Services, ESFA) will be informed, and advice sought.
- Should the complaint involve allegations of criminal activity, the Police will be contacted for support or to investigate as they see appropriate.
- The outcome of the investigation will be fully evaluated, any necessary remedial action will be taken in accordance with the disciplinary procedures of DH Associates, or the subcontractor involved.
- Any and each incident of a safeguarding nature will result in a review of safeguarding policy and procedures in order to prevent future incidents. DWP/ESFA and where necessary the DBS will be kept informed of any action taken, in line with company policy.

Likelihood of an occurrence: low

Impact of an occurrence: high

Contract Risks

Contract Transition

Risk: When closing a contract or taking over a contract from the previous contract holder there is a risk that employers or learners currently on the programme will become lost in the handover process. Neither of these occurrences is acceptable as both will lead to customer/employer hardship and a drop, in contract performance.

Solution: DH Associates staff has experience of the transfer of customers across contracts and has a robust system in place to ensure that effective communications between providers takes place. This system will be implemented on notification of contract award.

- **Transition Task Force:** a task force will be set up to oversee any transfer
- **Dedicated Lead:** the named lead will be a member of the Senior Management Team
- **Communication Plan:** we will develop an effective plan to be used across key stakeholders.
- **Employer Engagement:** employers and learners understand the changes and the support they will receive.

The same process will be followed in the unlikely event of DH Associates being unable to carry on delivering to employers and learners. This will ensure the learners, employers and staff are kept informed and can input into activities taking place with the new contract holder. If the new contract holder has their own procedures that differ significantly from DH Associates, we will follow their specific procedures and communications with all involved. DH Associates will inform the ESFA immediately of any circumstance that may negatively impact on our ability to deliver to the contractual requirements and will work with the ESFA in transitioning learners, employers and all paperwork/data /e portfolios to the new provider/s.

Likelihood of an occurrence: low

Impact of an occurrence: low

Human Resources

Risk: Lack of capacity due to Managing Director (MD) being absent due to either long term sick or leaving the organisation.

Solution: DH Associates Senior Leadership Team would cover short term up to 2 weeks. For longer term absences, DH Associates would place the most suitable, qualified and competent member of the SLT into the role as an interim measure until the MD returns to work or a new member of staff is recruited and in post.

Likelihood of Occurrence: medium

Impact of Occurrence: high

Risk: Lack of capacity due to DH Associates Team members being absent due to either long term sick or leaving the organisation.

Solution: With regards to the Team, the Team are trained to cover each other, plus the MD could cover short term up to 2 weeks in which time a replacement (permanent or temporary) could be sourced.

Likelihood of Occurrence: low

Impact of Occurrence: medium

ICT Security

Risk: Unauthorised access to or printing from the PCs used to access the ESFA data.

Solution: The member of staff authorised to access the data will have an individual PC logon.

Complex passwords will be used and are as follows:

- Eight character minimum
- Alpha-numeric with at least one digit
- Not reused within five password changes
- They also cannot use any part of their username

Likelihood of occurrence: low

Impact of occurrence: medium

ICT Security Training

Risk: All employees of the organisation and where relevant subcontractors and third-party users will receive appropriate awareness training and awareness updates in organisational policies and procedures as relevant for their job function.

Solution: There is a comprehensive training programme which includes information security, data protection and freedom of information which includes all the requirements of the GDPR.

In addition, the DH Associates SLT meets fortnightly and reviews data protection and information security matters as part of MIS.

Risk: Employees of the organisation who handle personal information must be made aware of the impact of loss of such material and the actions to take in the event of any loss.

Solution: There is a security reporting process in place. This policy requires all employees to report any security incidents to the Data Controller within DH Associates.

Likelihood of Occurrence: low

Impact of Occurrence: medium

ICT Outage

Risk: Loss of ICT and network services have a high level of impact on learner, apprenticeship, employer, customer service and other areas of contract compliance.

Solution: Resumption of service at the earliest possible moment is crucial. Any ICT failure must be a priority (after person safety and data security). The process for ICT outage is as follows:

- Notify the Head Office IT department to determine cause and timeframe for its recovery.
- Notify external provider of loss of service in relation to e portfolios and ensure resolution and learners are able to access learning resources and portfolios
- If outage will be greater than four hours, route all calls via Senior Managers` mobiles.
- If data has become corrupt as part of the outage advise Head Office IT of this at the earliest possible opportunity.
- Head Office IT will retrieve a clean version of the data from the latest backup.
- If no network provider outage is discovered Head Office IT will investigate alternative reasons for the failure (e.g. cables being cut) and rectify accordingly.

Likelihood of an occurrence: low

Impact of an occurrence: medium

Data Security

Risk: Loss of data/data access. Access to data is a priority and the following procedures are to ensure that should any DH Associates location be inaccessible, access to key data can still be obtained, allowing as normal a service as possible.

Solution: Data backup.

- Full and incremental cloud-based backups preserve company information assets and is performed daily.
- Contract specific data and document retention (see Data and Information Security Policy) specify what records must be retained and for how long. All departments are accountable for carrying out the provisions of the instruction for records in their organisation.

Solution: Data backup and access.

- DH Associates data is backed up daily. The data held at the backup site can be accessed 24 hours per day, seven days per week, meaning swift retrieval in the event of a disaster occurring. The backup media storage facility is secure, isolated from environmental hazards and geographically separate from the location.

Likelihood of an occurrence: low

Impact of an occurrence: high

Natural Disasters

Risk: Natural disasters by their nature are unpredictable and can cause severe disruption to business delivery.

Solution: In the event of a major natural disaster affecting a DH Associates office where notice is given, an emergency response process will be put in place. The process will be as follows:

- The first person aware should contact a member of the SLT who will then notify the rest of the team (or allocate someone to do so).
- In the event of a natural disaster of which there is advance notice, the following actions will be taken:
 - ✦ Notify Managing Director, of impending event, if time permits.
- If impending natural disaster can be tracked, begin preparation of alternate location within 72 hours as follows:
 - ✦ Contact Managing Director, to relocate to the alternate location.
 - ✦ Engage support personnel.
 - ✦ Contact insurance company.
 - ✦ Review all potential impacts and initiate action plans accordingly.
- 24 hours prior to event:
 - ✦ Create an image of the system and files.
 - ✦ Back up critical system elements.
 - ✦ Verify backup office is available from the alternate location.
 - ✦ Create backups of e-mail, file servers, etc.
 - ✦ Notify senior management.
 - ✦ Set up staff, partner and customer communications systems and draft messages.

Solution: In the event of a natural disaster of which there is no advance notice, the following actions will then be taken:

- Evacuate the building if appropriate.
- Contact the emergency services.
- Contact the Senior Leadership Team.
- Respond to the advice of the Senior Leadership Team regarding further actions.

Likelihood of an occurrence: low

Impact of an occurrence: high

Risk: Fire breaks out in DH Associates office. The first consideration in the event of a fire is to ensure the safety of all persons in the building and to ensure a proper evacuation procedure is followed where this is necessary.

Solution: The precise solution will be dependant of the nature and severity of the fire. On discovery of a fire the person discovering it should make an assessment of the situation and take appropriate action as set out in DH Associates emergency fire procedures. The following key actions will be taken to ensure safety of persons within the building and neighbouring buildings:

- If fire or smoke is present in the facility, the staff member who discovers it should evaluate the situation, determine the severity and take the appropriate action as defined in this section. Call the emergency services as soon as possible if the situation warrants it. If in any doubt, always evacuate and call 999.
- In the event of any emergency situation such as fire, personnel/customer/ visitor safety, followed by system and site security, are the major concerns. If in any doubt, the building should be evacuated using agreed procedures. This includes liaison with any other occupants of the building and alerting those in neighbouring buildings.
- If possible, the manager responsible for the site should remain present at (but at a safe distance from) the facility until the fire brigade has arrived. A staff roll-call should be taken and if possible, a rollcall of everyone using and visiting the building.
- Do not attempt to re-enter the building but wait for the emergency services to arrive and alert them to possible people still inside.
- DH Associates has fire equipment for use in an emergency.
- In the event of a major catastrophe affecting the facility, immediately (after contacting the emergency services) notify a member of the SLT and the relevant director plus the manager if they are not already aware.

Likelihood of an occurrence: low

Impact of an occurrence: high

Pandemic or Infection Alert

- If DH Associates office is affected by a mass illness such as a flu pandemic or a suspected infection (including any suspicion of terrorist or criminal-initiated infection such as an anthrax scare), then learners, apprentices, staff, customers and any other person's health and safety is the primary concern. Flu or other pandemic is likely to build up with increasing loss of staff for work. Managers will consult with the SLT to see whether the office needs to be closed or to find additional support for the duration. If a flu or similar pandemic is confirmed managers will liaise with government medical advisers and instruct accordingly.
- If a possible contamination of any kind threatening to health is suspected, procedures as for fire evacuation should be followed, with people instructed to gather at a central point and to remain in place until expert medical advice can be obtained. The most senior person present should

obtain specialist government advice. The building should not be re-entered until it has been cleared by the emergency services, who will advise on/undertake any necessary decontamination procedures.

- The SLT will undertake communications with learners, apprentices, staff, families and local/national media as necessary. Everyone else should be reminded not to speak with the media unless authorised to do so.

Likelihood of an occurrence: high

Impact of an occurrence: high

Suspect Mail

Risk: Mail with a suspicious appearance may contain such threats to life or health as explosive devices or chemical agents such as anthrax.

Solution: Vigilance is required at all times, and in particular at times of a known terrorist threat. The following procedures should be applied to ensure proper attention is given to this threat at all times:

- Look out for suspicious envelopes or packages (such as discolouration, crystals, strange odours or oily stains, powder, excessive tape or string, unusual size or weight, lopsided or oddly shaped envelope, postmark that does not match return address, excessive postage, handwritten, block-printed or poorly typed addresses/title but no name, addressed to individual no longer with organisation).
- Do not blow into envelopes.
- Do not shake or pour out contents.
- Keep hands away from nose and mouth while opening mail.
- Wash hands after handling mail.
- If you are in any doubt about a package, do not touch it, move it or open it and call the police on 999.
- If you believe you have handled a contaminated package
 - ✦ do not touch the package further or move it to another location
 - ✦ shut windows and doors in the room and leave the room, but keep yourself separate from others and available for medical examination
 - ✦ switch off any room air conditioning system
 - ✦ notify the building manager, call 999 and close all fire doors and windows in the building
- If there has been a suspected biological contamination, ensure that personnel outside the room are evacuated as soon as possible and ensure individuals in the contaminated room are evacuated to an adjacent unoccupied room away from the hazard.
- If you find a suspect package outside a building do not touch it or move it, instead inform the building manager clearly stating why you believe a biological/chemical material is involved

- If anyone believes they have been exposed to biological/chemical material, remain calm, do not touch eyes, nose or any other part of the body and wash your hands in ordinary soap where facilities are provided, but staff movement outside contained locations should be avoided as much as possible

Likelihood of an occurrence: low

Impact of an occurrence: medium

Flood or Water Damage

In the event of a flood or broken water pipe within any facilities, the guidelines and procedures in this section are to be followed.

Major Flood

- Assess the situation and determine if outside assistance is needed; if this is the case, dial 999 immediately and evacuate the facility.
- If water is originating from above electrical equipment, power down said equipment, provided it is safe to do so.
- Water detected may have different causes:
- If water is slowly dripping from an air-conditioning unit and not endangering equipment, contact repair personnel immediately.
- If water is of a major quantity and flooding beneath the floor (water mains break), immediately implement power-down procedures. While power-down procedures are in progress, evacuate the area and alert one of the emergency personnel.
- Provide them with your name, phone number where you can be reached, site and the nature of the emergency. Follow all instructions given.

Likelihood of an occurrence: low

Impact of an occurrence: medium

Auditing and Testing of the Business Continuity Plan

A regular auditing schedule has been put in place to ensure that the procedures outlined in this plan remain appropriate.

Desktop testing exercises will be carried out regularly.

Lead Responsibility

The MD and/or SLT are responsible for declaring a disaster and invoking the use of the business continuity plan. They are also responsible for communications during the disaster (to customers, learners, apprentices, employers, staff, ESFA – as applicable, subcontractors) and for declaring the disaster to be over. In circumstances where phone calls made to key contact personal are not

answered, a text will also be sent saying “Emergency DH Associates please respond”. The SLT will support the dissemination of all communications.

Appendix A: Business Continuity Contacts List

Senior Leadership Team (SLT):

Name	Role	Mobile Phone
Jueliya Mc Mahon	Managing Director	07580 864583
Caroline Murphy	Director Quality & Compliance Lead Safeguarding Officer	07702 726912
Kate Day	Head of Operational Lead Safeguarding Officer	07580 864473
Kellie Collister	Financial Controller	07889 252444

ESFA Escalation

Apprenticeship Service Support on 08000 150 600 or helpdesk@manage-apprenticeships.service.gov.uk

Awarding Body

City & Guilds Learner Support number is 01924 930801.