

Ormiston Academies Trust

Ormiston NEW Academy
 Business continuity policy

Policy version control

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Review	Policies will be reviewed in line with OAT's internal policy schedule and/or updated when new legislation comes into force
Description of changes	<ul style="list-style-type: none"> ▪ New policy to replace the crisis management policy

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1. Purpose

- 1.1. To provide a flexible framework to manage the response of Ormiston Academies Trust and its academies to any disruption, challenging situation, or emergency, maintain critical activities and recover from incidents quickly and efficiently where practicably reasonable.
- 1.2. The Trust will ensure robust plans are in place to minimise the risk of any disruption to educational activities, and effective emergency and contingency planning to minimise financial and reputational damage.

2. Policy statement

- 2.1. Ormiston Academies Trust (OAT) is committed to protecting the welfare of our entire academy community and, as such, understands that clear and effective procedures need to be in place to outline the Trust's and individual academy's responses in a variety of situations.
- 2.2. The reputation of the Trust and individual academies within it are also of utmost importance, therefore any decisions to close one or more academies, or other actions taken to protect students and staff, will always be made with the welfare and safety of everyone in mind.
- 2.3. Our intention is to mitigate the risk of closing an academy through the provision of robust planning to continue operations as best and as is feasibly possible.
- 2.4. This policy is to be read by all Head Office Managers and Senior Leadership Teams in each academy and communicated to all relevant parties. It is to be read in conjunction with the information within OATnet site [Business Continuity Plan](#), and the OAT policies setting out frameworks for Safeguarding, Data Protection, Finance management which can be found on [OATnet | Policies - Home \(sharepoint.com\)](#)

3. Scope

- 3.1. Ormiston Academies Trust (OAT) has the capacity, strategic and tactical capabilities to anticipate and manage incidents that could interrupt business continuity. The Trust is prepared with plans and measures to ensure that essential services can continue at a satisfactory level despite potential disruptions.
- 3.2. This policy is applicable to all to employees, volunteers, parents/carers, children, visitors, and everyone who is on the academy site. It covers the operational procedures and personnel responsible.
- 3.3. An incident is defined as an event that has the potential to cause an adverse impact on the operations and/or reputation of OAT. Incidents can range from administrative errors, health, and safety accidents, through to serious events with multiple business impacts that can stop one of more schools from operating.
- 3.4. **Section 7** contains a table to support incident assessment and decision making. The table outline's themes of incidents increasing in complexity and business impact.
- 3.5. The Trust understands the importance of being proactive and preparing for potential incidents. As it is not possible or desirable to write a response for every possible disruption, the effect can generally be summarised as an inability to carry out daily and or critical activities affecting business operations.

- 3.6. Please see [Appendix A - Incident Action Plan](#) within the [Business Continuity Plan](#) site for further detailed scenarios with actions.

4. Risk management

- 4.1. The OAT Executive and the Board of Trustees maintain a comprehensive risk register detailing key business operational risks to the Trust. These risks have been assessed by Head Office respective directorates in relation to business continuity management.
- 4.2. The risk assessment looks at the probability and impact of specific threats that could cause disruption to the delivery of services. Threats in this context refer to issues that have the capability of impacting on the ability of the trust to deliver its services and therefore place pupils and staff at risk.
- 4.3. The assessment of threats is not intended to be comprehensive but a pragmatic view of events that would either prevent services from operating as normal, or place pupils and staff at risk from services that would be interrupted.
- 4.4. The Trust's approach to assessing threats for the purpose of continuity management plans is to identify in advance key threats and key alternatives to service provision, including during the contracting process. However, actual events may not exactly match what has been anticipated.
- 4.5. Recognising the complex nature of the trust and the skills of its staff, the Trust will construct an incident management team comprising of the right managers and staff that will address the potential consequences of threats and put in place alternative arrangements, dynamically – according to the specific nature of the threat or incident that emerges at the time.

5. Responsibilities/actions

- 5.1. This policy is to be adopted and read by all academy governors, principals, senior leaders, and those who will form part of the Incident Management Team and read in conjunction with key information on the OATnet site [Business Continuity plan](#). In short Head Office and Academies will:
- Ensure that sufficient and competent staff are in place to deal with an incident.
 - Ensure that all emergency contacts and information are up to date and shared within the Incident Management Database stored within the OATnet site [Business Continuity Plan](#)
 - Ensure staff are aware of their individual responsibilities and that staff have received any relevant training.
 - Ensure that they record all incidents within iAM Compliant [Incident Reporting - iAM Compliant](#) as soon as reasonably practicable.
 - Ensure that compliance checks and testing is carried out as per the Estates Compliance agreement for each academy in particular to carry out a lockdown and fire evacuation drill on an annual basis (at minimum) and record outcome within task in iAM Compliant.

6. Incident management team (IMT)

6.1. Incidents categorised as Extreme and possibly some Severe incidents will require setting up an official IMT with Head Office to lead and direct the work to resolve the incident.

6.2. **Roles and responsibilities** of the IMT are detailed below:

- Provide strategic direction and overview to ensure an effective response is being undertaken.
- Establish and maintain clear communication channels / provide briefings to media and public / school staff.
- Prioritise the safeguarding of pupils, staff, followed by business operations.
- Manage potential harm to the reputation of the Trust.
- Provide representation at multi-agency Business Continuity meetings / groups.
- Authorise expenditure.
- Liaise as necessary with regulatory bodies.
- Liaise with insurance companies.
- Keep partners / key stakeholders informed.
- Receive and consider situation reports.
- Consider requesting assistance from other local authorities/agencies/parties.
- Plan and co-ordinate the recovery phase of the incident.
- Maintain an accurate log of decisions made and actions taken during the incident to facilitate feedback, debrief and review. The log may also be called as evidence in an enquiry.

6.3. As a minimum, the IMT should include:

- Incident Director (OAT CEO or CEO nominated member of the Executive)
- Specialists from Head Office relating to the incident – I.e. ICT / Estates/ H&S/HR / Data Protection / Finance
- Media / PR Lead (to co-ordinate Trust media response and liaise with 3rd party leads – Local authority, Parents, local community etc.)
- Administrative Co-ordinator (to ensure adequate resource and deployment of administrative support, and establishment of an incident record filing system)
- Academy Principal
- Education Director
- Other specialists or staff from Head office that have knowledge or experience of the incident such as Designated Safeguarding Lead (DSL)

6.4. In the event of an incident requiring IMT, the IMT will assemble the team with the aim of:

- Ensuring the immediate safety of all students, staff, and visitors by implementing emergency procedures (fire evacuation, lockdown, first aid incident etc.)
- Confirming the situation.
- Analysing the facts.
- Defining or approving an appropriate response, factoring-in both immediate operational and broader strategic considerations.
- Managing the wider logistical and communications issues.
- Liaising with stakeholders.

- Overseeing the response through to resolution and recovery.
 - Recovering from the incident in an expedient manner and resuming normal educational activity.
 - Complete post incident Report
- 6.5. An incident can occur at any time of the year, day or night, and a fully staffed team is required if an incident is to be dealt with efficiently and effectively. It is necessary for deputies to be identified to provide additional resilience, especially during academy holidays.
- 6.6. To ensure a fully staffed IMT, staff should as far as possible be aware at all times of the whereabouts of IMT members and their deputies. The Incident Director shall co-ordinate availability of key staff to avoid gaps in support.

7. Incident assessment to support decision making

- 7.1. To aid decision making, incidents can be themed into one of the following incident impact ratings as detailed within table 7 below

Business Continuity Incident Rating	Description	Example incidents	Decision making accountability & Authority	Escalation / Information
Negligible	Disruption affects a single class, year group or other function and can be managed through normal operational activities. Disruption is not serious or widespread and is unlikely to affect school operations to a significant degree - No significant impact on staff or pupil safety.	<ul style="list-style-type: none"> • Roof leak, heating or lighting failure in single classroom/office resulting in spaces that cannot be used for up to half a day. • Shuffling teaching spaces to accommodate losing a space for a short period 	These are events or circumstances that the local academy Principal and the SLT can deal with using local management procedures	For information to Education Director and Regional Estates /IT Manager (if applicable)
Minor	These are events or circumstances that the local academy Principal and SLT can deal with using its procedures which do not affect the academy or the Trust adversely or prevent it from carrying out its day-to-day activities. Disruption affects more than one year group, class or other function and remains self-contained. The affected area has the capacity to manage the disruption – with or without support. Incident monitored locally with possible activation of the Academy Incident Management procedures.	<ul style="list-style-type: none"> • Roof leaking, heating, or power failure in 1 or 2 classrooms/offices resulting in spaces that cannot be used for several days. • Temp changes to room scheduling to take spaces out of action for several days • ½ day loss of Internet or telephony systems 	These are events or circumstances that the local academy Principal and the SLT can deal with using local management procedures	For information to Education Director and Regional Estates /IT Manager (if applicable)
Moderate	These are events or circumstances that cause or threaten disruption to the academy on such a scale that it prevents the academy from carrying out its day-to-day activities. These incidents typically would require Trust support. The local Academy Incident Management procedures are likely to	<ul style="list-style-type: none"> • Grid outage resulting in loss of utilities (gas/water/Elec), beyond control of school. • Heating failure in the middle of winter. • Threat of terrorist action or a bomb hoax 	Principal, Education Director and involving relevant HO Team (linked to incident theme) can make decisions about	Inform LGB Chair, Education Director and other relevant HO teams linked to the incident.

Business Continuity Incident Rating	Description	Example incidents	Decision making accountability & Authority	Escalation / Information
	be activated partially, or in full, and notification must be made to a member of the Executive Board. The LGB Chair should be notified if there is a risk of adverse publicity or reputational damage e.g. school to close for 1 or 2 days.	<ul style="list-style-type: none"> 1 day + loss of Internet or telephony systems loss or shortage of staff - e.g. prolonged or above normal levels of absenteeism due to illness, or other scenarios such as severe weather, transport disruption loss of academy IT system 	school closures (up to 2 days).	
Severe	These are events or circumstances that disrupt the whole academy and possibly the local community. An initial assessment by the academy Principal / Executive Principal/ Education Director will establish if the incident is a severe and activation of the local Incident Management Procedure, where necessary and / or activation of the HO Business Continuity plan	<ul style="list-style-type: none"> serious damage to, or loss of, a part of / full building or access to a building (Fire, flood, collapse) Loss of life or serious injury to staff, pupils, or members of the academy community / public on school site A deliberate act of violence or threat of violence such as the use of a knife or firearm, civil disturbances, and terrorism financial loss resulting in inability to pay staff/supplier loss or shortage of staff - e.g. prolonged or above normal levels of absenteeism due to illness, or other scenarios such as severe weather, transport disruption 2 days + Academy Level cyber incident stopping systems from working 	Principal / Executive Principal/ Education Director will report to a HO Executive on decision making	The LGB Chair and HO Executive / CEO must be notified. The CEO will inform Trustees if there is a risk of adverse publicity or reputational damage.
Extreme	A Incident would typically be an event that impacts multiple academies within the Trust or has the potential to threaten the future operation of the Trust. A Incident Management Team (IMT) will be established at the declaration of an Extreme incident in managing the response. The membership of the IMT may vary as different skills will be required depending on the nature of the incident but will always be established and chaired by the CEO or member of the Executive team.	<ul style="list-style-type: none"> financial loss resulting in inability to pay staff/supplier at Trust level loss or shortage of staff - e.g. prolonged or above normal levels of absenteeism due to illness, or other scenarios such as severe weather, transport disruption loss of critical supplier or services at Trust level. e.g. MIS, Phone, Internet, Utilities, Insurance loss or breach of IT systems and / or data / cyber incident including child/staff data being published on the dark web at Trust level Regional or National event that causes widespread disruption to the country. E.g. virus/pandemic/invasion or terrorist bombing / attacks 	Principal / Executive Principal/ Education Director will report to the Incident Director on decision making	Inform LGB Chair, Education Director and other relevant HO teams linked to the incident. The CEO will inform Trustees if there is a risk of adverse publicity or reputational damage.

8. OAT emergency support hotline

- 8.1. There is an OAT 24-hour emergency number operated by PLMR is in operation.
- 8.2. Calling 0800 368 8804 or +44 121 260 888 (if abroad) will put you in touch with a member of the PLMR Team who will then alert a member of the Executive and other key staff identified in [Appendix C - contacts](#) found within the [Business Continuity Plan OATnet Site](#)
- 8.3. Appendix C details key emergency contacts that can also be contacted directly to support with incident management.

9. Audit and review

- 9.1. This document should be reviewed and changed as required on an annual basis by head office and after any significant incident.
- 9.2. The OAT Executive and IMT will conduct reviews post incident to gain lessons learnt on how to improve policy and processes. These reviews will be completed and recorded within iAM Compliant
- 9.3. This document is stored within OATnet to provide both academy head office staff with the relevant information required to prepare for and deal with incident

10. Appendices

- 1.1. Appendix A can be found [Appendix A - Incident Action Plan](#) within the [Business Continuity Plan OATnet site](#)
- 10.1. Please use table in section 7 and appendix A to help guide assessment of incident, who to contact and initial response as outlined within appendix B on page 9.
- 10.2. [Appendix C - contacts](#) found within the [Business Continuity Plan OATnet site](#)

Appendix B - flowchart

