Business Continuity Policy and Framework

July 2019

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Equality Impact Assessment: July 2019

Contents

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NHS Lothian (Chief Executive)	1
West Lothian Council, Emergency Planning Unit	1

In addition, this Plan will be available on iShare

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1   Policy Statement

West Lothian College recognises the possibility for incidents or emergencies to occur which would directly impact upon our activities. In these circumstances, the College has clearly defined priorities for handling any incident:-

- Protecting and ensuring the health and safety of College staff, learners and other users
- Minimising and recovering from damage to College facilities
- Returning to a 'business as usual' state as soon as practicably possible.

2   Introduction

Business Continuity Management (BCM) is a process that enables West Lothian College to proactively identify and plan to minimise the impact of risks that could affect its outcomes, operations and infrastructure. BCM provides the capability for the College to ensure continuity of learning, together with support for its learners, staff, centres and departments following any disruptive event.

When an emergency occurs, those responsible for managing the response will face an array of conflicting demands and pressures. These will vary according to the events causing the incident, the speed of the onset and many other factors. There will always be the added pressures in any incident involving a college due to the potential vulnerability of many of those involved; namely children and/or vulnerable adults.

The College will ensure that it creates, and maintains, a detailed Business Continuity Plan (BCP). The BCP, supported by Centre and Department Plans and Business Impact Analyses where needed, will provide the framework to manage the immediate effects of any incident or emergency and support a return to normal business as soon as possible in line with the priorities in the Policy Statement above.

3   Aim

This document provides a framework for the management of the response to a major incident or emergency in line with the guidelines set out in ISO22301.

4   Scope

The Business Continuity Plan covers all areas of the College. The Facilities Management Team will remain responsible for specific Disaster Recovery arrangements relating to the recovery of IT servers/applications that they operate.

Incidents and emergencies may occur in and out with College. It is impossible to define all types. However, the following are examples of the types of situations which may occur:-

In College

- Acts of violence, leading to injury or death, including hostage taking or serious threats of violence;
- Fire or explosion; or
- Serious damage to College property, how so ever caused.

Out with College

- Death of a student or staff member;
- Transport accident involving students or staff;
- A widespread or community related disaster that has the potential to impact on the College;
- Death or injuries on College journeys and excursions; or
- Civil disturbances and acts of terrorism.

5   Roles and Responsibilities

The Principal has overall responsibility for ensuring processes and procedures are in place to respond to an incident/emergency. If the Principal is not available, responsibility for managing an incident/emergency will pass to the Vice Principal, Finance & Curriculum Services (VP F&CS).

Supporting the Principal/VP F&CS will be the Strategic Directional Team (SDT).

The SDT, which provides strategic direction and co-ordinates action, is made up of the Senior Team. The Tactical Management Team (TMT) implements the action of the SDT and provides technical knowledge. The members of the TMT will depend on the incident/emergency.

The BCP shall contain a number of flowcharts/checklists for a variety of different incident types/emergencies as identified during the Business Impact Assessment (BIA) process. The VP F&CSwill update the BCP on an annual basis.

The BCP shall also contain copies of the latest BIA information for each area to provide the required level of detail to support the TMT. It is the responsibility of each Head of Centre/Head of Department to update their BIA on an annual basis (or following a period of significant change (i.e. accommodation, major curricular changes).

6   Testing

The BCP shall be tested annually, with scenarios presented to the College Team which match one of the available incident type flowcharts. Testing will be a desktop exercise in recognition of the volume of activity within the College and the need to prevent disruption.

7   Activating the BCP

- The Facilities Manager – Identification of facilities related issues which occur during working hours or are notified via the out of hours service.
- Deputy Facilities Manager – Identification of significant disruption to the College's Information infrastructure.
- College Team – Through liaison with the Executive Office staff, the College Team may identify issues which warrant activation of the BCP.

While each of these roles may identify activity which they feel warrants activation of the BCP, only the Principal or VP F&CS may activate the plan. Each of these roles is responsible for contacting the Principal (or VP F&CS) and presenting a case for BCP activation.

8   Communication

In the event of an incident/emergency, effective information management is vital. During any period in which the BCP is active, all official College communications must be approved by the SDT. No staff member out with the SDT should approve any communications or discuss the incident emergency directly with the media or via social media.

9   De-Activating the BCP

Given the potentially serious nature of an incident/emergency which warrants BCP activation, the plan will stay in effect until such time as the Principal (or VP F&CS) agrees that the need for the BCP has passed and that the remainder of the needed activity can be managed under existing College job profiles.

10   Links to Other Areas

Risk Management

Business Continuity Management and Risk Management work closely together, as both are concerned with good governance and raising awareness about risks. However the focus of the two areas is different; Business Continuity Management is only concerned with managing those risks that could cause a disruption to the College's operations, whereas Risk Management has a wider remit. Also for each risk there is a potential opportunity. BCM can be used as a mitigation of some risks identified in the College Risk Register and is referenced within the College Risk Register. Priority when developing business continuity arrangements should be given to treating situations identified as being most likely and having the greatest impact.

Internal Audit

As part of review and monitoring and, in addition to the reviews undertaken by the VP F&CS, Internal Audit has an important role in ensuring that the Business Continuity Management Plan achieves its objectives as set out in this document.
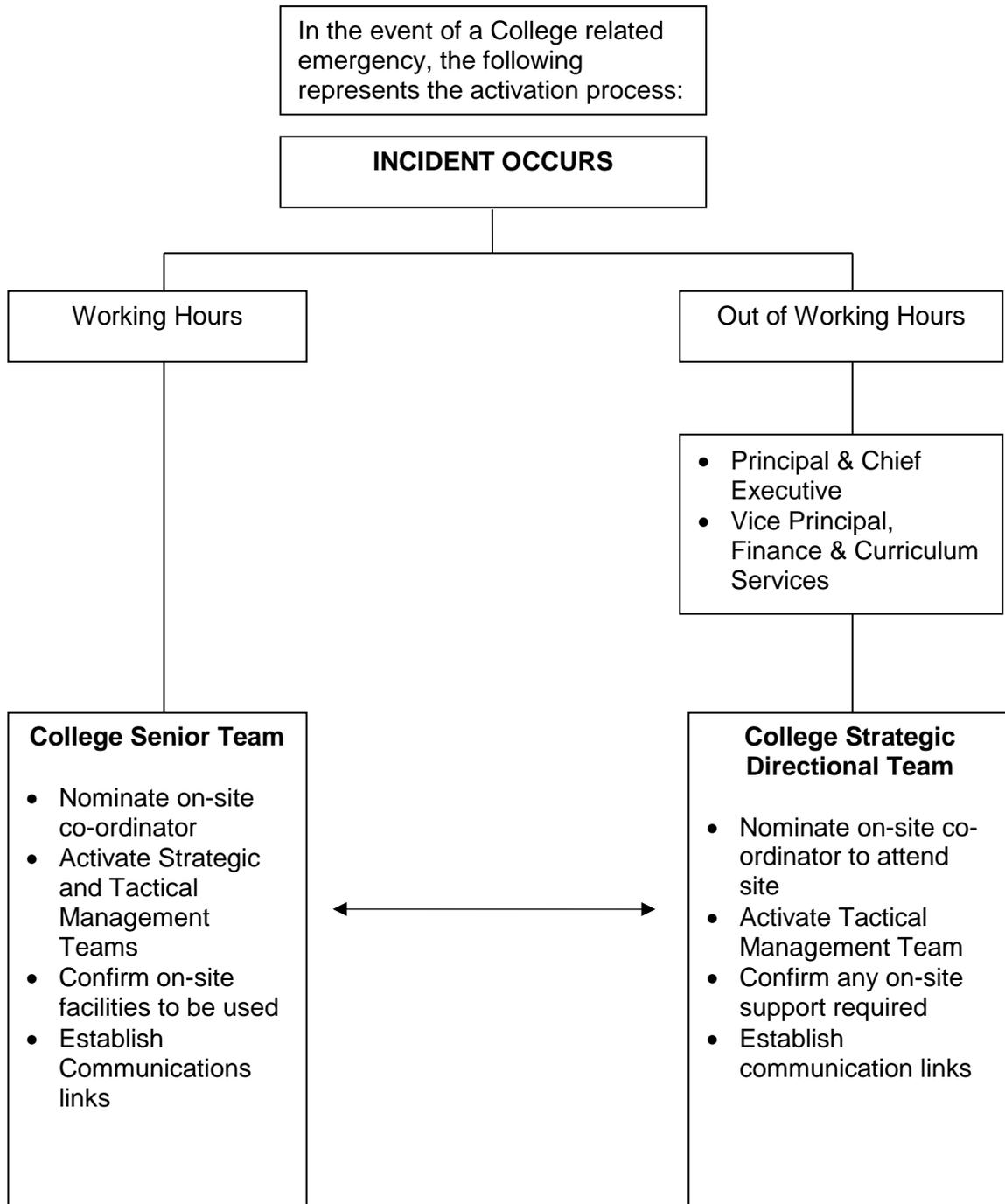
Information Security

Information security covers the protection of all forms of information and is concerned with ensuring its confidentiality, available and integrity. A key part of the Business Continuity process focuses on protecting against a potential loss of resources, including important information, thereby ensuring it is stored appropriately and remains available after a disruption. Information Security should be considered when developing alternative arrangements to store/access key information. The loss of College information – either by a loss of access to it or by someone else being able to access it – could have serious implications and dependent on the severity, would be classed as an incident at centre/department level and also potentially for the College.

11   Review

This Policy and Framework should be reviewed whenever changes affect it or after three years, whichever is the earlier by the H&S Officer.

12 Emergency Response Flowchart

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                    ┌─────────────────────────────────┐
                    │ In the event of a College related│
                    │ emergency, the following          │
                    │ represents the activation process:│
                    └─────────────────────────────────┘

                    ┌─────────────────────────────────┐
                    │         INCIDENT OCCURS          │
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Working Hours	Out of Working Hours
	• Principal & Chief Executive • Vice Principal, Finance & Curriculum Services
College Senior Team • Nominate on-site co-ordinator • Activate Strategic and Tactical Management Teams • Confirm on-site facilities to be used • Establish Communications links	**College Strategic Directional Team** • Nominate on-site co-ordinator to attend site • Activate Tactical Management Team • Confirm any on-site support required • Establish communication links

Section 2: The Equality Impact Assessment Process

Phase 1: Screening and Prioritisation

The first phase of the Equality Impact Assessment (EIA) is to screen the policy, practice, strategy etc. to establish if it has an impact upon anyone because of a protected characteristic (age, disability, ethnicity, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation).

A single EIA should be conducted and recorded for each individual policy, practice, strategy etc.

Please compete the following:

Name of policy/ practice/strategy/ decision	Named individual responsible for policy/practice/strategy/ decision	Name of person conducting initial EIA
Business Continuity Policy and Framework	Emily Purdie	Emily Purdie

Supporting notes to help in the completion of Phase 1

- Consider impact in terms of the protected characteristics and other groups who may experience disparities in opportunity.

- Make use of existing knowledge, experience, research and consultation.

- Caution is needed not to consider a policy or practice 'equality neutral' just because no evidence of adverse impact exists (e.g. you might find little research exists with regard to equality areas such as sexual orientation).

- When thinking about positive impact consider ways to tackle discrimination, promote equality of opportunity and promote good community relations.

Q1. Given the aims of the proposed policy, practice, strategy decision is it likely that there will be a negative impact on one or more of the groups named above. Or is it clear at this stage that it will be equality neutral?

Protected Characteristic	Impact (explain)
Age	None
Disability	None
Gender reassignment	None
Pregnancy and maternity	None
Race	None
Religion or belief	None
Sex	None
Sexual orientation	None

Comments:

There is no negative impact on the groups named above, it will be equality neutral. The Policy & Framework provides a framework for the management of a response to a major incident or emergency which will protect and ensure the health & safety of College staff and learners.

Q2. For which groups are there likely to be a negative impact? What is this impact likely to be, and what plans could be built in to address negative impacts and to add measures which promote a positive impact at this stage?

Protected Characteristic	Impact (explain)
Age	N/A
Disability	N/A
Gender reassignment	N/A
Pregnancy and maternity	N/A
Race	N/A
Religion or belief	N/A
Sex	N/A
Sexual orientation	N/A

Comments:

As no negative impacts have been identified at this point no further action is necessary at present.

Q3. At this stage, how could the policy, project or strategy promote positive impacts for any of the groups named above?

> **The Policy & Framework provides a framework designed to protect staff and learners in the event of a major incident or emergency.**

Q4. Is a full impact assessment required?   NO (use box to explain rationale behind decision)

> **No issues have been identified at this point.**

Signature of named individual responsible for policy	Signature of individual responsible for carrying out initial impact assessment (if different from previous)	Date of completion of initial impact assessment
Emily Purdie	**N/A**	**26/7/2019**

In the event of a full impact assessment being required this document must be attached and used as part of that process

Phase 2: Full Equality Impact Assessment

Once Phase 1 has been completed and it has been deemed necessary to conduct a full EIA for a given policy, procedure or project the following questions should also be worked through.

Q5. Summarise the evidence that describes the current situation for those groups where an impact has been initially assessed, and the sector or geographical area in which this policy/practice / strategy decision will operate.

Comments:

Q5. Supporting Notes

- Consider impact in terms of age, disability, ethnicity, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and other groups who may experience disparities in opportunity.
- Look at existing evidence, research & data or statistics (both quantitative & qualitative).
- Are any of these groups under or over represented, do they have access to the same resources and is the reality of their experience the same?
- Is it useful to consider the underlying causes of any inequalities?

Q6. Where the initial impact assessment indicated that there is potential for this policy, practice, strategy etc to have a negative impact on one or more group, provide further information.

Protected Characteristic	Impact (explain)
Age	
Disability	
Gender reassignment	
Pregnancy and maternity	
Race	
Religion or belief	
Sex	
Sexual orientation	

Comments:

Q6. Supporting Notes

- Is this impact likely to be different for different groups?
- Are some equality groups excluded from the benefits?
- Are there barriers to certain communities enjoying the benefits?
- Are certain sub-groups disadvantaged e.g. Gypsies and Travellers or Somali community?
- Does it challenge or reinforce stereotypes?
- Does it give different groups real choice?

Q7. **Where the initial impact assessment showed that there is potential for this policy, practice, strategy, etc to have a positive impact, such as tackling discrimination, promoting equality of opportunity for one or more groups, provide information.**

Protected Characteristic	Impact (explain)
Age	
Disability	
Gender reassignment	
Pregnancy and maternity	
Race	
Religion or belief	
Sex	
Sexual orientation	

Comments:

Q7. **Supporting Notes**

- Is this impact likely to be different for different groups?
- Will this project help communication between groups?
- Does it support education for Black, Asian and Minority Ethnic (BAME) groups where needed?
- Is there a focus on reducing barriers for a specific group e.g. disabled people?
- Are jobs created accessible to all?
- Does this strategy extend the provision of affordable childcare?
- Does it harness the potential of refugees and asylum seekers to contribute to Scotland's economy?

Q8.   Given your answers to the previous questions, how will your delivery plans be revised to reduce or eliminate negative and to enhance positive impacts?

Comments:

Q8.   Supporting Notes

- If the assessment shows adverse impact consider if the project is legal and how this adverse impact can be reduced. This might include finding another way to meet the objectives, introducing new steps to meet specific needs for specific groups. Can the adverse impact be justified by overall aims or by other legislation? If the strategy, policy, project, etc are unlawful it must be changed. Ensure any changes don't disadvantage another group.
- If the assessment shows that no adverse or positive impact is likely (equalities neutral) this might be acceptable but consider if measures could be added to promote WLCs equality aims.
- If the assessment shows your policy, project, strategy, etc is not likely to result in adverse impact and does promote equality then there may be little revision required. Some policy, project, strategy, etc have a differential impact because they are designed to promote equality for a specific group. This can be justified as part of a wider strategy but a clear rationale should be given.

Q9. Where the initial EIA indicates that this policy, practice, strategy, etc may impact adversely upon community relations and cohesion, the gender pay gap, attitudes toward disabled people, the involvement of disabled people in public life, or require special steps to be taken for disabled people, provide further information.

Additional Considerations	Impact (explain)
Community relations and cohesion	
The gender pay gap	
Attitudes toward disabled people	
Involvement of people in public life	
Special steps for disabled people	

Q10. Where the initial impact assessment indicated that this policy, project, strategy, decision etc provides an opportunity to promote equality in terms of community relations and cohesion, the gender pay gap, attitudes toward disabled people, the involvement of disabled people in public life, or require special steps to be taken for disabled people, provide further information

Additional Considerations	Positive Impact (explain)
Community relations and cohesion	
The gender pay gap	
Attitudes toward disabled people	
Involvement of people in public life	
Special steps for disabled people	

Q11. Given your answers to the above questions how will your delivery plans be revised to reduce or eliminate negative impacts and to enhance positive impacts?

Comments:

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Q12. How have the different stakeholders / beneficiaries / staff who are affected by this policy / practice / strategy etc been consulted? Please note any important issues

Comments:

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Q12. Supporting Notes

- Has relevant consultation already taken place?
- If not how and when will consultation take place?
- Will this be direct consultation with groups that share a protected characteristic and / or organisations that represent them?
- What steps will be put in place to ensure full participation is possible e.g. using sign language interpreters for events, provision of crèche facilities arranging meetings in local community venues at different times of day, questionnaires available online etc.
- How will those consulted be informed of the outcome of the process?
- Is it possible to carry out a joint consultation with a similar project or a project in the same geographical area?

Q13. How will the real impact of this policy, project, strategy, decision etc on groups be monitored to ensure all targets set are met?

Comments:

After the Assessment

Once an EIA has been conducted it is important to make certain that correct monitoring and review mechanisms are in place to ensure that predicted outcomes and outputs are delivered. These should be factored into the initial EIA process and timelines for the review and development of the item agreed and published along with the policy, project, strategy, decision etc.

If circumstances change or unexpected situations develop that could impact upon a policy, project, strategy, etc the relevant items should have another EIA conducted upon them as necessary in light of the changed circumstances.

EIA should be published on the College website.

Annex A: Supporting information, guidance

Information and advice is available on the internet to help you to understand the issues which are addressed through the EIA process and more generally as part of the Equalities agenda. The following are useful resources to consider for some of the questions posed by the EIA process. Further web based searching is encouraged to help expand and develop issues and ideas more fully.

Useful links

http://www.equalityhumanrights.com/scotland/ - Equality and Human Rights Commission Scotland

http://www.scotland.gov.uk/Topics/Statistics - Scottish Government Statistics

http://www.scotland.gov.uk/library5/social/gpgc-00.asp - Guidance on how to ensure that equalities groups are included in consultation exercises.