

Control Information	
Policy Title	Business Continuity Plan for Apprenticeship Training Policy
Group Directorate	Customer Operations
Directorate	One Academy
Policy Owner	Samantha Whenman, Head of One Academy
Approval Group	Customer Operations
Date first approved	25/4/22
Date last reviewed	27/4/22
Next review date	31/3/23

VERSION CONTROL

Version	Date	Author	Reason for New Version
1.1	27/4/22	Samantha Whenman	New policy required for ESFA compliance

1 PURPOSE OF THIS POLICY

This plan has been developed to reflect the principles detailed in our Disaster Recovery Plan and the requirements of the Education and Skills Funding Agency (ESFA) Apprenticeship Funding Rules.

The objective of this plan is to prepare the One Academy Apprenticeship Team and provide assurance that we have considered a wide range of risks following a major crisis, disaster or unexpected event which may have a significant impact on the operation and continuation of our training, and apprenticeship provision and learners' ability to successfully complete their programmes and we have contingency plans in place to eliminate, mitigate and manage the risks. The plan prioritises the needs of apprentices and seeks to ensure the continuation of teaching, learning and assessment, as well as minimising interruption to the delivery of a service to employers.

This policy will be reviewed annually by the Senior Management Team and approved by the Governance board.

One Academy Apprenticeships maintains a register of issue of organisation policies and procedures. Policies and procedure are shared with all staff and acknowledgement is a requirement. Staff are also informed of updates following review of procedures and policies and following changes identified and applied following a whole organisation review cycle. Organisation policies and procedures forms a key part of all new staff induction.

2 SCOPE

2.1 This policy applies to:

- All One Housing employees
- One Academy Governance Board
- Extends to partner organisations including employers of apprentices

3 This policy directly relates to the following policies but is not limited to:

- Safeguarding Adults Policy
- Health and Safety Policy
- Centre Withdrawal of Awarding Organisation Approval Policy (One Academy)
- Complaints Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy

4 REGULATION, STATUTORY GUIDANCE AND BEST PRACTICE

- Education and Skills Funding Agency Apprenticeship Main Provider Rules 2021-2022 Apprenticeships, Skills, Children and Learning Act 2009 (ASCLA 2009), in connection with the Secretary of State's power to fund English statutory apprenticeships under section 100(1A) (as inserted by the Enterprise Act 2016)
- Equality Act 2010
- The Health and Safety at Work Act 1974
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006

5 Key regulations that apply to this policy are:

- HSE requirements
- Companies House
- Financial Conduct Authority
- Charity Commission

6. Programme Structure

One Academy offers flexible apprenticeship training delivery options to respond to individual needs of each employer and their learners through blended learning approaches combining face to face group teaching, e-learning, guided independent study and 1-2-1 coaching delivered online, at employer's locations or at One Academy Arlington Centre training facilities. For this reason, these continuity plans consider a wide range of arrangements that may be drawn on to address the needs of individual employers and their learners, should contingency arrangements need to be implemented.

One Academy is committed to applying principles of equality, diversity and inclusion throughout every aspect of our provision. In this context One Academy acknowledges that individual learners will be affected in different ways if any of the risks detailed in this plan occur. For this reason, the Apprenticeships team will communicate directly with learners and their employers where additional support, advice or guidance is required and will work with any learners who have approved reasonable adjustments or identified additional needs not restricted to those with educational Health Care Plans, to ensure actions and options meet their individual requirements as far as possible to minimise impact, reduce, eliminate or mitigate disadvantages arising from a crisis situation.

7. Continuity of study

One Academy Apprenticeships will take all reasonable steps to minimise disruption to apprenticeship delivery by:

- Re-scheduling planned group training, tutorials and 1-2-1 coaching sessions in agreement with apprentices and their employers taking into account business needs and personal circumstances
- Adapting the delivery model and mode of learning to ensure access to the same learning content via a different method of learning delivery if required including distance learning. This may include loaning laptops to apprentices, if necessary, should they need to study from home and need secure device that is not used by others
- Providing assistance to affected learners to move to a new training location for sessions that would have been on a pre-arranged site or relocating sessions to employers' premises if appropriate
- Where training sessions were scheduled to be onsite at an employer's premises, we will arrange to move to alternate locations provided by the employer or other One Academy suitable premises in an accessible location
- Approaches and Resources to support continuity of learning
- Apprenticeship training is delivered through a blended approach, and this provides a level of flexible options to ensure the relevant learning and assessment and support can continue to be delivered to apprentices.

The methods of learning include face to face delivery, in person or online, directed and supervised independent learning activities, webinars, online-coaching, telephone coaching, guided research reading and feedback, work-based learning assignments, work-based assessments, employer led training.

The following list also includes a range of resource and methods for facilitating distance learning, accessible with minimal or no access to technology:

- Learning packages with suggested reading, learning tasks, theory illustrations, worksheets, guided reflection, schedule of assignments and instructions on apprenticeship standard KSB outcomes and the assessment plan to enable apprentices to continue with 20% off-the-job learning. Packs will also include instructions for gathering portfolio evidence and preparation for meeting gateway and end point assessment outcomes. In the event of a prolonged closure absence, lecturers and assessors can prepare hard packs that can be distributed for apprentices to use at home
- Lecturer and assessor check-ins and tutorials using a variety of technologies including telephone, email, web conferencing, Onefile which can be used to facilitate one-to-one or group learning delivery
- Zoom or Microsoft Teams. One Academy uses Microsoft Teams however, One Academy will purchase an education licence to access Zoom in cases of emergency, when distance learning methods are needed and can't be delivered through other methods

- Access to resources and portfolios. All apprentices have access to learning content via Onefile , teaching, learning and assessment plans and their portfolios which are accessible on any media platform with internet access
- Ensuring Accessibility. One Academy is aware some apprentices may not have continuous access to the Internet or phone depending on their location and personal circumstances during a prolonged closure or absence. One Academy will adapt to their needs and offer a variety of methods of distance learning and ensure full compliance with the Disability Act and ensure materials will be provided in alternative formats, when necessary.

7. Travel

Apprentices are required to make their own arrangements to attend their place of work and study. Where a change of location of study is required for contingency reasons, One Academy will seek to provide an alternate location that is as accessible as possible.

Where alternate arrangements have to be made that could not easily be accessed by the usual forms of transport or apprentices have mobility needs, we will work with the employer to consider the nature and impact on individual apprentices and agree an appropriate solution.

Where it is the fault of One Academy we will calculate the additional travel cost involved and arrange to reimburse apprentices on a case-by-case basis. Where it is due to factors beyond our control we will agree a resolution with Employers on behalf of their Apprentices. If One Academy agrees to reimburse travel costs these will not be taken out of apprenticeship levy funding in order to comply with ESFA funding rules.

All staff are issued with portable IT equipment to enable them to work remotely, negating the need to travel in the event of an emergency. Remote visits can be completed using mobile phone, email and Zoom or Microsoft Teams.

8. Risks to continuity of learning

In the event that One Academy Apprenticeships ceases to operate:

One Academy Apprenticeships will implement contingency plans which will allow existing apprentices to continue to complete their current apprenticeship programme. The measures One Academy has in place to manage this risk means the likelihood of an imminent cessation of Apprenticeship provision is low. As part of One Housing, a large established housing association and subsidiary of Riverside Housing, One Academy has a strong infrastructure and is well supported. One Academy manages this risk by having in place:

- Financial reserves that would allow us to continue to operate for a suitable duration

- Business growth plan that is monitored and reviewed by our governance board, Director of Customer Operations, Customer Operations Committee and Chief Executive
- Internal quarterly reviews and monthly monitoring of finances provides assurance of our business's performance and forecasts
- Business Operations Risk Register detailing risks to the business, impact, control measures and actions to mitigate risk which is monitored, reviewed and updated quarterly by Governance and Compliance department

Where viable, One Academy will maintain key academic and administrative staff to enable current apprentices to complete their apprenticeship. If One Academy is no longer able to deliver apprenticeship training, we will engage with the ESFA and undertake research using the finding an apprenticeship training provider tool and utilise partner networks to identify an alternative training provider. We will work with our ESFA account manager and employer to support apprentices to make a smooth transition to another apprenticeship training provider minimising disruption to learning, assessment and progress.

9. Failure to maintain Registered Training Provider status

In the event of termination of agreement with the ESFA as a result of One Academy being removed from the Register of Apprenticeship Training Providers (RoATP) and therefore becoming unable to continue the delivery of apprenticeship programme, we will engage with the ESFA to make arrangements for effective exit to minimise the disruption to both learners and employers.

The detail of all apprentices, their apprenticeship programme, progress made, registration with awarding organisations and evidence that is required to contribute towards successful completion of their end point assessment would be made readily available.

10. Subcontracting

One Academy does not subcontract any provision to other providers.

11. Unable to recruit or retain suitably qualified delivery staff

The impact of an inability to recruit suitably qualified staff is low. One Academy has a permanently employed delivery team and associate delivery staff to draw upon if temporary cover is required and to increase capacity to deliver if required at short notice.

One Academy Apprenticeships manages this risk by having in place:

- A recruitment policy that covers succession planning and aligns to curriculum planning process

- A robust and flexible procedure for creating new roles with competitive remuneration based on business case and approval procedure that responds to business needs to meet the needs of learners and employers
- Robust performance management of delivery team, annual appraisals and career development opportunities
- One Academy has a pliable approach to address staff gaps in staffing quickly. This is supported initially by utilising suitably skilled and vocationally competent and experienced associate delivery staff to maintain consistency in delivery until permanent delivery staff can be appointed. We also have contracts with specialist recruitment services able to support recruitment of qualified apprenticeship delivery staff

12. Back Up of Systems and Data

One Academy is supported by a robust IT infrastructure which has in place processes and protocols for the ongoing monitoring and management of risks to IT systems such as malicious attacks or hacking. We use Sharepoint for organisational collaboration and storing of relevant programme data.

One Academy manages these risks to business-critical systems and the back-up and restoration of data by having in place the following processes:

- SharePoint using Commvault Metallic. Share point is backed up every 24 hrs.
- Data in Office 365 is protected using Multi-Factor Authentication, Conditional Access Policies and Data Loss Prevention (DLP) policies
- Endpoints (Windows 10 laptops) are encrypted and managed using Microsoft Endpoint Manager (formerly Intune)
- Endpoints are protected with Sophos Intercept X with XDR (antivirus, malware protection, web filtering)
- Endpoints are also protected using Cisco Umbrella (DNS and content filtering)
- Conditional Access - when someone is trying to access data in O365, the conditional access policy will evaluate the request and prompt for Two Factor Authentication if it is not coming from a trusted device or trusted location
- Firewall protection and a skilled and up-to-date team of IT specialists who monitor system risks and maintenance

One Academy Apprenticeships will implement its business continuity plans to reinstate IT services as soon as possible. Remote training and skills coaching that were scheduled during a system failure or interruption will be rescheduled and recordings and/or additional support material provided for learners who were unable to attend sessions due to a One Academy Apprenticeships' IT system issue.

One Academy uses Onefile as the e-learning portfolio and hosts e-learning packages to support learning delivery for apprentices, organisational collaboration and storing of relevant programme data. We also use the PICS Learner Management System which is a complete end-to-end solution for apprenticeships including capturing, storing of programme and learner data and ILR returns. Access is restricted to a Management

Information Systems and Compliance Manager and one Data and Compliance Officer. In the event that an interruption to IT and data systems occurs restoration of programme data and learner portfolio content the additional back-up options are available:

Onefile has the following policies in place:

- Onefile back-up Policy - <https://onefile.co.uk/customer-data-backup-policy/>
- Onefile Information Security Policy - <https://onefile.co.uk/information-security-policy/>

PICS data back-up process:

- PICS database backup is run every day, though if your copy of PICS is held on a server that backs up this may not be necessary. A backup may also be needed to send a copy of your data to Pellcomp when dealing with queries.

13. Communication

One Academy holds apprentices' personal contact details on secure information systems and. In addition, we hold contact details the apprentices' employer organisations including the Human Resource managers and Learning and Development leads responsible for overseeing apprenticeship programmes and the line managers of apprentices who can enact their internal emergency contact procedures as necessary.

Through our training systems and available channels of communication we have the following options to communicate with apprenticeship delivery staff and our apprentices : Onefile, email, telephone, Microsoft teams, our designated Twitter and 'Facebook' groups. We also have the employer contact details for each learner involved in our apprenticeship programmes. Senior Management Team and delivery staff can access communication tools remotely as well as on-site.

14. Roles and responsibilities

Key emergency contacts and functional responsibilities. The ESFA will be informed of any break in learning.

Director of Customer Operations, Sandra Fawcett

- Overall responsibility for ensuring the continuity of apprenticeship training
- Oversee incident response
- Chair Crisis Team meetings
- Be prepared to answer questions from the media

Head of Corp Compliance Risk & Assurance, Governance and Compliance, Edward Carpenter

- Responsibility for managing disruption in the provision of administrative services, assessment arrangements and physical premises
- Meet and greet emergency services as they arrive, with a floor plan of the building if necessary
- Ensure all significant occurrences and decisions are recorded, together with reasons for decisions made.
- Follow up communication

Head of One Academy, Samantha Whenman

- Coordinate and Manage the response to the major incident
- Communicate the significant incident to the delivery team, Directors, Chief Executive
- Escalate to the Director if the incident escalates
- Co-ordination of the response
- Liaise with Prime Funding organisations
- Liaise with employers, partner providers, Awarding Bodies
- Allocate resources
- Responsible for external liaison
- Responsibility for dealing with issues relating to apprentices' workplace and the ongoing checks of insurance and health and safety
- Responsibility for implement actions to minimise impact on apprentices' apprenticeship training and timely progression
- Responsibility leading the response to reduce the impact of the incident on apprentices' well-being and pastoral support
- Agree key information to be given to apprentices by delivery team

Head of Safeguarding and Community Safety, Charlotte Smith

- Raising safeguarding critical incidents to exec and internal safeguarding panel
- Liaison and offering advice to One Academy designated safeguarding leads
- Liaison with police if necessary
- Liaison with local authority and assistance with safeguarding and referrals

In case of a significant incident emergency, various contact details are available in the learner and employee handbooks. These include:

One Housing Head Office: 0300 123 9966

Director of Customer Operations: Sandra Fawcett 07788 320191, sfawcett@onehousing.co.uk

Head of Corp Compliance Risk & Assurance, Governance and Compliance, Edward Carpenter, 07876816182, ecarpenter@onehousing.co.uk

Designated Safeguarding Officer: Charlotte Smith, 07717692933, charlottesmith@onehousing.co.uk

ESFA Service desk contact information Telephone: 0800 015 0400 or [ESFA Contact Form](#)
ESFA Service desk contact information Telephone: 0370 000 2288 or

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Authorised by:	S. Fawcett	Date Authorised	April 2022
Created by	S. Whenman	Date Produced	April 2022
Annual check date	March 2023	Next full review	March 2023

- 6 Set out the overall approach to delivering the policy – please cover: overall team structure; whether provision is inhouse/outsourced, key contractual details (names of contractors; length of contract etc) and an outline of how the particular service is to be provided. For example, you might say: ‘This service is outsourced to a third-party company on a five-year contract. It is supported by an OHG team of x people in the y directorate’.
- 7 Identify any external stakeholders with a direct interest or role in the policy. Set out what their interest/role is and any particular obligations they have to OHG (or vice versa) under the policy. (Any ‘internal’ stakeholders and their requirements should be embedded in the Operation section of the policy – Section 6 below.)
- 8 Set out any specific reporting/monitoring requirements of those stakeholders.
- 9 If there are particular terms or definitions that should be explained at the start of the policy, then do so here. This is not intended as a full glossary but to ensure readers know what the main terms mean as they read the policy.

10 LEADERSHIP, ROLES AND RESPONSIBILITY

10.1 Leadership and commitment

- 11 Set out how the organisations’ leadership (Board and Executive Level) will support the delivery of the policy – for example: through systems integration, wider business change, allocation of resources, communications.

11.1 Organisational Roles and Responsibilities

- 12 Set out the roles and responsibilities of the key personnel involved in the policy and any particular delegated authorities. Where particular roles at OHG have specific responsibilities under the policy these should be listed here. This section should cover the following:

13 Directors and Heads of Service

14 Managers

15 Staff**16 Any particular responsibilities for all employees****17 Third Parties (e.g. contractors, suppliers, residents)****18 Executive Staff****19 Board/Committee (likely limited to a monitoring/approval role)**

Please use the following format for setting out roles and responsibilities:

ROLE TITLE
• Bullet points for responsibilities

20 OPERATION**21 Set out the detail of the policy and how it is intended to be applied.****22 You can use sub-headings and sub-sections as necessary to cover all the key aspects of delivery. The level of detail here should be sufficient to explain all aspects of the policy and to allow a reader to determine what OHG is doing in respect of it – through reference to procedures as necessary.****23 This section's starting point is the duties and responsibilities incumbent on OHG as set out in sections 3-5. It should then break each one down to demonstrate how OHG delivers on them.****24 The section should include in-house and outsourced processes and the criteria to control those processes.****25 In this section a “you say, we do” approach works well – i.e. a broad but succinct description of how the corporate duty is met and then a direct reference to where the detail can be found.****26 Detailed explanations on delivery should be contained within written procedures which should be included as appendices to the policy.****27 The section should include how to manage planned and unintended changes.****28 RISK MANAGEMENT****28.1 Actions to address risks and opportunities**

29 Set out the key risks to achieving the policy outcomes. Risks should link to a specific objective or sub-objective and be pitched at a suitably operational level so that a tangible operational response can be clearly established. Existing controls in place to mitigate each risk are to be set out.

30 Set out any particular opportunities for OHG that may arise from the operation of the policy and how those will be taken forward.

31 SUPPORT

31.1 Resources

32 What resources are required to deliver the policy – personnel, systems, materials, budget. Are these in place? If not, how will they be obtained?

32.1 Competence and Training

33 Set out any specific levels of competence required by people operating the policy (e.g. any required statutory or specialist training or qualifications).

34 Set out the training that will be provided to personnel operating the policy – whether this is e-learning, basic awareness or specialised training.

34.1 Awareness and Communication

35 Set out how the policy will be communicated to the wider business and other stakeholders including whether it will be published on the OHG website.

35.1 Data Protection

36 Set out whether personal data (including special category/sensitive personal data) will be processed under this policy.

37 Set out any specific legal requirements which apply to personal data processed under this policy (check the legislation set out in section 3, the Personal Data Processing Register and consult with the Data Protection Team).

38 State whether a Data Protection Impact Assessment (DPIA) has been carried out and whether identified controls have been incorporated into this policy. State that any changes to the policy or processing of personal data under the policy may require a review of the DPIA.

39 Set out any additional/specific data security measures required.

40 State how individuals are/will be notified about how One Housing processes their personal data under this policy.

41 If business processes under the policy process sensitive or significant amounts of personal data, set out any additional training requirements needed.

41.1 Documented Information, Records Management

- 42 Set out any documentation needed to support the delivery of the policy.**
- 43 Set out any codes of practice, industry standards, accepted best practice which will be followed for managing records under the policy.**
- 44 Set out where the records relating to the delivery of the policy will be managed (such as a computer system / file locations) and any specific required controls.**
- 45 Set out applicable retention periods for records and data processed under this policy (check the Personal Data Processing Register and the One Housing Data Retention Schedule).**

46 MONITORING

- 47 Set out what arrangements and measures are in place to monitor the operation of the policy and the achievement of its outcomes. This should include any key management checks.**
- 48 This section should set out checks which give the policy owner (and the Board) confidence that the policy is actually being followed and particular responsibilities of individuals are being delivered.**
- 49 Monitoring arrangements should cover the range of internal and external stakeholders who may need assurance, for example in relation to risk, compliance or performance management.**
- 50 Arrangements should be as streamlined as possible - seek to satisfy as many requirements with one control without undermining the quality of assurance.**
- 51 Monitoring would be expected to take place at several levels – monitoring of front-line controls, monitoring by middle and senior management and then reporting to/oversight by ET, Committees, Boards, regulatory bodies, auditors and authorities (considering the ‘three lines of defence’ concept here can be useful). A suitable balance should be achieved to maximise assurance.**
- 52 List any KPIs and where/when these will be reported**
- 53 List any other routine reporting requirements**

54 BREACHES OF THIS POLICY

- 55 Set out whether there are any circumstances in which an action in breach of this policy would be permitted and who would need to authorise such an action.**
- 56 Set out how any identified breaches of the policy (that are not covered by the statement above) should be managed and what, or how, corrective measures should be applied.**

57 CONTINUOUS IMPROVEMENT

58 Set out what arrangements there are to identify and learn lessons from the operation of this policy.

59 Set out how those lessons will be applied in practice – amendments to policy/procedure etc.

60 REVIEW

61 Set out how the managerial team in charge of the policy will assess whether the policy is suitable, adequate and effective

62 Set out the review schedule for the policy

63 Set out the review methodology – who will do it, who needs to be consulted about it.