

Business Continuity Policy

Keystone Training Ltd believe it is important to have a strategic approach to assessing and managing risk in order to ensure we achieve our corporate goals, deliver the results our clients want and to maximise opportunities for positive business growth.

Risk assessment has to be part of our ongoing activities, which means every employee has a responsibility to be alert for, identify, manage and review risks. Recognising that innovation is key to ongoing company growth, we want to be risk aware rather than risk averse. Identifying and tackling risks provides opportunities for continuous improvement as well as allowing us to minimise or eliminate problems.

Our process is simple:

1. Identify a risk
2. Assess (a) how likely the risk is to occur and (b) the probable impact of the risk
3. Manage the risk through (a) identifying options (b) creating a plan (c) reviewing the success of the plan

This process is underpinned by communication and consultation with other employees plus key stakeholders such as associates, suppliers, clients or external bodies/associations.

All employees are expected to do this on a continuous basis for their area of responsibility. Specific roles are as follows:

Managing Director Angela Loggie	Overall responsibility for embedding a risk management culture and raising awareness of the importance of this to the business.
Operations Manager Rendee Yule	<p>Reviewing risk management practices on an ongoing basis and reporting back to the Managing Director on issues and actions undertaken, typically through 6 monthly PDR conversations.</p> <p>Receive reports on key risk issues and internally verify a sample.</p> <p>Ensure risk is an item on team meeting agendas once a quarter.</p> <p>For key projects, to determine the company's approach to risk (aware/averse depending on the project) and to carry out a risk assessment.</p> <p>To arrange risk training where it is believed to be needed.</p>

	<p>Provide advice, support and guidance to the team and associates where needed.</p> <p>Cascade the results of the annual review of the business continuity plan to all associates.</p>
All other employees	<p>Identify and analyse risks in own area of responsibility.</p> <p>Create risk reports and issue to Operations Manager for review.</p> <p>Ensure that risk management is incorporated into all plans and programmes.</p> <p>Contribute to maintaining a culture of risk awareness through setting a personal example.</p> <p>Maintain awareness of risks and contribute to the control process where appropriate.</p>
Keystone associates	<p>Maintain awareness of risks and contribute to the control process where appropriate.</p>

We have assessed our risk of operational disruption as low, as many of our systems are de-centralised (for example, employees and associates are home-based so any loss of working space would have a localised and small-scale impact which is more easily and quickly dealt with than the loss of an entire office for the whole team).

The key risk areas we have identified are detailed below along with the measures we have in place to minimise or avert the risk:

Loss of key supplier (printer) – risk low – impact high – solution: we now have two printers, both able to deal with marketing and promotional items as well as training materials. Both are in a position to take over from the other immediately should the need arise.

Team attrition – risk low to medium – impact high – solution: active succession planning policy with training and coaching to allow all employees to operate up one level. Forward recruitment undertaken so a bank of potential candidates always available during a rolling 6 month period.

Actor/facilitator sickness absence – risk medium – impact high – solution: reserve actors/facilitators always held and briefed for every development intervention. The Programme Manager for any contract is available by telephone and email on evenings and early mornings to manage any unexpected sicknesses or absences.

Information loss (paper and online) – risk low – impact high – solution: this was initially assessed in 2010 as a high risk and so all documents/data are now stored electronically using a remote hosting service with backup servers. Nothing is saved locally, ensuring absolute

safety and recoverability of all data/documents. All hard copy records are scanned and saved electronically on the remote hosting service by our Learning Programmes Team. We have effectively eliminated data loss and all data are fully recoverable in the unlikely event of problems. In this way we have increased business efficiency by reducing storage space requirements, reducing data handling requirements and also preserved the safety of our records.

Inaccessibility of work space – risk low – impact medium – solution: our company is a home-based business with all employees and associates working from their own homes. In the event of anyone's home being unavailable for them to carry out their normal day's work, we have a range of venues available to us across the UK from which they can continue working with only a short delay such as our partner hotel and conference venues across the UK.

Loss of ICT – risk low – impact low – solution: As our employees and associates all work from home across the UK, any loss of ICT would be localised rather than whole office. Each employee and associate is aware of the location of their nearest partner venue with internet, as well as the location of internet cafés in their local area. All employees, and the vast majority of associates, carry a personal, as well as a business, mobile, thus having a spare in case of loss, theft or damage. In the event of loss or damage to a computer, immediate action to get a repair or replacement locally as needed is pre-authorised by the Managing Director. Many of our partner venues have internet computer stations for guest use should a repair require longer than workload/resource permits.

Cash flow management – risk low – impact high – solution: we have maintained excellent standing with our bank for our account management and have never required the use of a loan or overdraft facility. Our Finance Assistant, Emma Lucas, has functional responsibility for cash flow management, with a weekly finance meeting to review this with the Managing Director and Operations Manager. Careful attention to detail, scheduled and regular invoicing for work, a forecasting spreadsheet for the rolling year ahead and maintaining good working relationships with the finance teams in our (generally blue chip/long established) clients minimise the risk of the unexpected. We also have a wide range of clients in different sectors, thus avoiding 'having all our eggs in one basket'. In the event of a crisis such as a client becoming insolvent, the Managing Director has responsibility for an emergency meeting with the Operations Manager and Finance Assistant to review the situation, its impact and agree the way forward in conjunction with our bank account manager.

'Out of hours' crises – risk low – impact medium – solution: we believe it is essential to keep our clients informed. Each account manager takes responsibility for communicating with their clients should there be a disruptive event or issue which requires notification.

Approval to deliver apprenticeship training – risk low – impact high – solution: Operations Manager to maintain documentation and audit trail to meet ESFA requirements; monthly team meetings have time set aside for review of risks and opportunities around apprenticeships; yearly strategy meetings of senior team to review apprenticeship approval from a strategic perspective to identify risks and any actions needed.

Apprenticeship team capacity to provide continuity of service to clients – risk medium – impact high – solution: Operations Manager and Managing Director review apprenticeships team capacity and pipeline programmes on an annual basis as part of our strategy review to determine any potential gaps in capacity. New programmes arising and reviewed at monthly Sales Team meetings to sense check capacity and ability to meet client

requirements. Any gaps to be addressed through recruitment or internal succession planning, typically within 3 months.

Emergency contacts in the event of a significant incident

Angela Loggie – Managing Director

angela.loggie@keystonetrainingltd.co.uk / 07776 190304

Rendee Yule – Operations Manager

rendee.yule@keystonetrainingltd.co.uk / 07506 968884

Education and Skills Funding Agency

0370 000 2288

This plan is reviewed annually with all Keystone employees at the final team meeting of the year.

Signed



Position: Joint Managing Director

Date: 14/12/06

Date of last review: 27/09/19