

BUSINESS CONTINUITY PLAN

Transparency Policy Statement

Document Control

Document Name	Business Continuity
Plan Current Version	1.0
Plan Owner	Michael Fletcher/Sean Edwards/Risk Committee
Plan Approver	Michael Fletcher
Date of Last Review	18 April 2024

Documented arrangements for:

- Incident Management
- Business Continuity
- Recovery and Resumption

1. PLAN PURPOSE

To provide a flexible response so that Glaisyers ETL can:

- Respond to a disruptive incident (incident management)
- Maintain delivery of critical activities/services during an incident (business continuity)
- Return to 'business as usual' (resumption and recovery)

The following sites are covered by this Plan:

Glaisyers ETL The Plaza

3 Hardman Street 100 Old Hall Street Manchester M3 3HF Liverpool L3 9QJ

Plan Owner

Michael Fletcher, Partner, is this Plan's Owner and responsible for ensuring that it is maintained, exercised, and updated in accordance with internal requirements for business continuity.

Plan Distribution

This Plan is distributed as follows:

- Risk Committee (Sean Edwards, Carolyn Smith, Nick Johnson, Janet Westwell, Michael Fletcher);
- Russell Brown, Managing Partner;
- Nick Johnson, Senior Partner;
- David Jones, Head of ETL UK Legal and Partner.

Plan Review Date

This Plan will be updated every 12 months, and formally reviewed in April of every calendar year.

2. PLAN ACTIVATION

Circumstances

This Plan will be activated in response to an incident causing significant disruption to normal service delivery/business, particularly the delivery of key/critical activities. Examples of circumstances triggering activation of this Plan include:

- Loss of key staff or skills e.g. above normal levels of absenteeism due to illness;
- Loss of critical systems e.g. IT failure;
- Denial of access, or damage to facilities e.g. loss of a building through fire;
- Loss of a key resource e.g. a major supplier vital to the delivery of a key service.

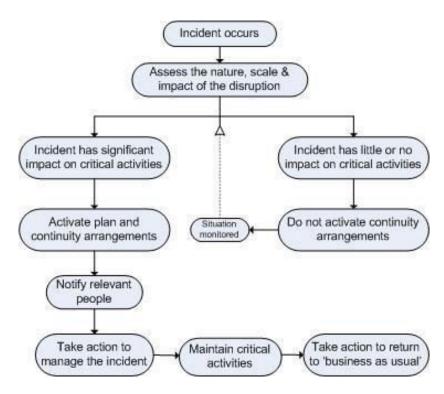
Responsibility for activation

A member of the nominated Business Continuity Team for Glaisyers ETL will normally activate this plan:

•	Sean Edwards	07921 158935
•	Carolyn Smith	07921 158935
•	Michael Fletcher	07929 155394
•	David Jones	07862 238765
•	Russell Brown	07799 404127
•	Nick Johnson	07931 527204

Process for activation

A member of the nominated **Business Continuity Team** for Glaisyers ETL will normally activate this plan:



3. INCIDENT MANAGEMENT

Purpose of the incident management phase

- Protect the safety of staff, visitors and the wider community;
- Protect vital assets, e.g. equipment, data, reputation etc;
- Ensure necessary communication takes place;
- Support the Business Continuity phase;
- Support the Recovery and Resumption phase.

Actions to protect the safety and welfare of staff, visitors and the public

The following actions will be taken to protect the immediate safety of staff, visitors and the public:

	ACTION	FURTHER INFO/DETAILS
1.	Evacuate the building(s)	Use normal evacuation procedures for the building.
2.	Ensure all staff report to the Assembly Point.	The Assembly point for the business is: outside The Ivy Restaurant, near the building front entrance.
		Janet Westwell/Carolyn Smith are responsible for completing this action.
3.	Call emergency services (as appropriate)	TEL: 999 Carolyn Smith/Janet Westwell are responsible for completing this action.
4.	Check that all staff, contractors, and any visitors have been evacuated from the building and are present. Consider safety of all staff, contractors and visitors as a priority.	Our business utilises an electronic Office 365 sign-in sheet which is accessible remotely. Carolyn Smith/Janet Westwell are responsible for completing this action.
5.	Ensure log of incident is started and maintained throughout the incident phase.	The log must be in writing and can be done after any incident
6.	Record names and details of any staff, contractors or visitors who may have been injured or distressed in the incident.	Carolyn Smith/Janet Westwell are responsible for completing this action.

7.	Forward details of any fatalities or injuries in the incident to HR (depending on scale of incident) and agree action that will be	The HR contact to forward this information to is Janet Westwell, HR Manager at Glaisyers ETL. Carolyn Smith/Janet Westwell are responsible for completing this action
8.	Assess impact of the incident to agree response / next steps.	David Jones, Russell Brown, Nick Johnson, Michael Fletcher, Carolyn Smith, Sean Edwards, and Janet Westwell are collectively responsible for completing this action.
9.	Log details of all items lost by staff, contractors or visitors as a result of the incident.	Carolyn Smith/Janet Westwell are responsible for completing this action.
10.	Consider whether the involvement of other teams, services or organisations are required to support the management of the incident.	Depending on the incident, the following may be approached to assist with incident management: Personnel Health and Safety Legal Occupational Health.

Circumstances

In the event of an incident and this plan being activated, the following people should be contacted. Nature of contact will depend on the incident type and time it has occurred.

David Jones, Russell Brown, Nick Johnson, Michael Fletcher, Carolyn Smith, Sean Edwards and Janet Westwell are collectively responsible for completing this action.

Actions to support business continuity

	ACTION	FURTHER INFO/DETAILS
1.	Recover vital assets/equipment to enable delivery of critical activities.	The essential equipment/resources/information that need to be recovered where possible are:
		Carolyn Smith and/or Sean Edwards are responsible for completing this action.
2.	Assess the key priorities for the remainder of the working day and take relevant action.	Consider sending staff home, to recovery site etc. Consider WFH.
3.	Inform staff what is required of them	Janet Westwell, Carolyn Smith and Sean Edwards are responsible for completing this action.
4.	Publicise the interim arrangements for delivery of critical activities.	Ensure all stakeholders are kept informed of contingency arrangements as appropriate.

Actions to support recovery and resumption

	ACTION	FURTHER INFO/DETAILS
1.	Take any salvage/asset recovery actions that are appropriate.	Remove any equipment, furniture, records etc that are at risk of damage.
		Carolyn Smith/Sean Edwards are responsible for completing this action
2.	Continue to log all expenditure incurred because of the incident.	Use a financial expenditure log to record costs incurred as a result of responding to the incident. Carolyn Smith and/or Sean Edwards are responsible for completing this action.
3.	Seek specific advice/inform our Insurance Brokers Company.	Nick Johnson, Michael Fletcher, Carolyn Smith and/ or Sean Edwards are responsible for completing this action.

Communicating with staff

It is highly likely that staff will need to be informed about a business disruption and actions being taken to ensure the continuity of our services. Utilising our online HR solution, staff details can be accessed to provide suitable communication. Communication should be by email and telephone as necessary.

4. BUSINESS CONTINUITY

Purpose of the business continuity phase

The purpose of the business continuity phase of response is to ensure that critical activities are resumed as quickly as possible and/or continue to be delivered during the disruption. The Business Impact Analysis (BIA) for Glaisyers ETL sets out details of critical activities and the resources required to deliver them both in 'business as usual' and in crisis situations. The Business Continuity Team will refer to the BIA to help inform the business continuity response that is required.

Critical Activities

The outcome of the Business Analysis process has been to identify the following activities as critical:

	Brief Description of Critical Activities
1.	Legislative risk and regulatory changes
2.	Large loss of significant staff in a short period of time/high-turnover
3.	Quality of work and reputational damage/online review system monitoring
4.	Terrorist attack
5.	Significant loss of business data and/or backups
6.	Business and commerciality risk
7.	Any large financial reliance on a single department/work-type
8.	Severe level of internal absenteeism
9.	Poor growth/acquisition decisions
10.	Significant cyber attack

Non-Critical Activities

A number of activities are non-critical and consideration will be given to:

- Not recovering these activities until critical activities have been resumed;
- Suspending these activities and diverting their resources to support the critical ones.

The non-critical activities for this team/service/organisation are:

	Brief Description of Non-Critical Activities
1.	Extreme weather
2.	IT equipment failure including Wi-Fi and Ethernet connections within the main office premises
3.	Power and internet line outages
4.	Lack of ongoing and supportive management to staff
5.	Staff turnover
6.	Legislative changes to a single work-type/department

Business Continuity Actions

The Business Continuity Team for the incident is responsible for ensuring the following actions are completed:

	ACTION	FURTHER INFO/DETAILS
1.	Identify any other staff required to be involved in the BC response	Depending on the incident, the Business Continuity Team may need additional/specific input in order to drive the recovery of critical activities.
2.	Evaluate the impact of the incident	Use an incident impact assessment form to understand the impact of the incident to ensure "business as usual".
3.	Plan how critical activities will be maintained.	Consider: Immediate priorities (WFH when necessary). Communication Strategies. Deployment of resources. Finance.
4.	Log all decisions and actions, including what you decide not to do and include rationale.	Use a decision and action log to do this.
5.	Log all financial expenditure incurred.	Use a financial expenditure log to do this.

6.	Allocate specific roles as necessary.	Roles allocated will depend on the incident and availability of staff.
7.	Secure resources to enable critical activities to continue/be recovered.	Consider requirements such as the staffing, premises, equipment. Refer to BIA for more detailed.
8.	Deliver appropriate communication actions as required	Ensure methods of communication and key messages are developed as appropriate to the needs of your key stakeholders e.g. customers, suppliers, staff, Executive Boards.

5. RECOVERY AND RESUMPTION

Purpose of the recovery and resumption phase

The purpose of the recovery and resumption phase is to resume normal working practises for Glaisyers ETL. Where the impact of the incident is prolonged, normal operations may need to be delivered under new circumstances e.g. from a different building.

Recovery and Resumption Actions

The following actions will be taken to protect the immediate safety of staff, visitors and the public:

	ACTION	FURTHER INFO/DETAILS
1.	Agree and plan the actions required to enable recovery and resumption of normal working practises.	Agreed actions will be detailed in an action plan and set against timescales with responsibility for completion clearly indicated.
2.	Continue to log all expenditure incurred as a result of the incident.	Use a financial expenditure log to do this.
3.	Respond to any long term support needs of staff.	Depending on the nature of the incident, the Business Continuity Team may need to consider the use of Counselling Services e.g. internal Occupational Health, or involvement of appropriate External Agencies.

4.	Carry out a 'debrief' of the incident and complete an Incident Report to document opportunities for improvement and any lessons identified.	Use an Incident Report Form to do this. This should be reviewed by all members of the Business Continuity Team to ensure key actions resulting from the incident are implemented within designated timescales.
5.	Review this Continuity Plan, considering lessons learned from incident and the response to it.	Implement recommendations for improvement and update this Plan. Ensure a revised version of the Plan is read by all members of the Business Continuity Team.
6.	Publicise that there is 'business as usual'.	This would be done through our online social media channels as well as through directly emailing and/or speaking over the telephone with our client listings. We'd also be considering who needs to know that normal working practises have been resumed regarding suppliers and further supporting functions.

