



092. IFG Business Continuity Plan

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Applies to:	All IFG employees and anyone acting for, or on behalf of IFG. This includes governors, temporary workers, external consultants, contractors and other volunteer workers.
Related IFG policies and documents:	<ul style="list-style-type: none"> ● Significant Incident Management Protocols ● Risk Management Policy ● Risk Register ● Health & Safety Policy ● Health & Safety Risk Assessment ● Reportable Events Policy ● Prevent Policy ● Prevent Risk Assessment & Action Plan ● Student Terms and Conditions ● Refunds and Compensation Policy

This Business Continuity Plan is supported by tools set out in the following appendices:

Appendix A: Significant Incident Management Team Roles and Responsibilities Matrix

Appendix B: Significant Incident Management Plan

Appendix C: IFG Emergency Closure Protocols

Appendix D: IFG Dpt/Area-Specific Recovery Plan Template

Please see Annex 1 at the end of this Plan for a risk assessment of the range of risks to continuation of study for IFG students, the probability of the risk occurring, how these risks may differ based on individual student needs, characteristics and circumstances.

Introduction

This Business Continuity Plan is part of IFG’s overall system of risk management, our internal control and corporate governance arrangements. Our risk management control processes and mitigations involve the

identification, evaluation, and management of significant incidents/risks that IFG faces or that may arise, foreseen and unforeseen.

Under this Business Continuity Plan, a 'Significant Incident' is considered to be an incident that affects, or could potentially impact, IFG's business continuity and delivery of education and other services, whether short or long-term.

This Business Continuity Plan is supported by the IFG Significant Incident Management Plan which should be implemented to ensure and/or restore Business Continuity in as timely and organised a manner as possible. All staff and governors of IFG are asked to ensure that they read and understand the contents of this Plan and to ensure that they remain aware of its contents in order to act appropriately should an issue affect the College.

Key Purposes

This Plan sets out the arrangements and mechanisms in place to support IFG and its staff to mitigate, manage, and navigate such risks, incidents and events. The purposes of this Plan are to:

- To prevent or limit loss of life or injury, and limit or minimise damage to assets and/or buildings (emergency recovery);
- To maintain, or where necessary restore, IFG's full operations with minimal disruption to students and staff (business recovery);
- Create an awareness and embed an institutional understanding at all levels of management and governance, of the need for business continuity planning, development and risk management where this is compromised;
- Ensure protocols are in place for responding to significant incidents and events (see Appendix A to this Plan);
- Identify major areas of risk for business continuity and plan mitigations accordingly.

The key purposes set out above will be facilitated and managed by the following:

- A designated Significant Incident Management Team for leading and managing critical or other significant/major incidents affecting IFG
- Clear assigned staff/governor roles and responsibilities
- Proactively identifying priority areas and actions to ensure duty of care and to facilitate incident responses
- Coordinating the response of all departments and staff in the event of a significant incident to ensure that business-critical functions are restored as soon as possible and that all IFG services are reinstated as soon as is practicable.

Areas of Risk

The major areas of risk for IFG's business continuity with an according assessed risk level, have been identified as:

- Closure of IFG due to financial or business reasons, or due to Acts of God, including for example (but not limited to) fire, loss of services, flood, adverse weather conditions, bomb threat or other significant incident - **Low**
- Loss of life and/or major injury sustained on or off-site - **Low**
- Major infection/illness/epidemic/pandemic forcing closure or partial closure of the IFG London campus - **Low**
- Major loss of IT capacity due to theft, hacking, virus, equipment failure or damage - **Low**

- Failure to meet IFG’s education delivery and student obligations, including:
 - a. Closure of the IFG London Campus due to loss of rental premises - **Low**
 - b. Closure of one or more of our partner teaching centres - **Medium**
 - c. Closure of one or more programmes of study prior to completion by students - **Low**
 - d. Inability to deliver material components of one or more programmes of study - **Low to Moderate**

Please see Annex 1 at the end of this Plan for a risk assessment of the range of risks to continuation of study for IFG students, the probability of the risk occurring, how these risks may differ based on individual student needs, characteristics and circumstances.

Significant Incidents that may need to be externally reported

Below is a list of examples of significant incidents impacting IFG’s Business Continuity at the institutional level that according to their circumstances and context may require to be externally reported to one or more authorities (eg the Police, accrediting bodies or any funders of IFG):

- a) Matters relating to IFG’s ownership, legal form or corporate structure;
- b) Matters relating to management and governance;
- c) Matters related to compromise to IFG education, or inability to deliver IFG education
- d) Matters relating to our educational quality and standards;
- e) Matters relating to student concerns;
- f) Matters relating to IFG’s financial viability or sustainability;
- g) Matters relating to information provision.

Examples that may be more relevant to the day-to-day activities of IFG include (for example):

- Notification of an investigation by a professional, regulatory or statutory body which would include organisations that accredit our degrees
- Closure of a subject area or department
- Fraud and legal cases under certain circumstances
- Prevent Duty-related incidents

Communication with students

In the spirit of our institutional goals and values and our commitment to ensuring a positive experience for our students that maintains an open dialogue with them, IFG commits to:

- ❖ being open and transparent with our students should any risk to the continuity of their programme of study arise;
- ❖ communicate and inform our students of any risks to the continuity of their studies in a timely, accessible and supportive way;
- ❖ communicate and inform our students promptly via email and text of any material changes (whether short/longer-term) to their programme arrangements resulting from a Significant Incident, along with information also clearly published on our website;
- ❖ ensuring that any significant changes, issues and resolutions necessitated or brought about by a Significant Incident are communicated promptly and in person (where possible) to all relevant students, with follow-up information confirming information shared plus any salient additional information issued in writing via email;

- ❖ engage and consult with students and consider their views in a timely manner before deciding to implement any substantial changes to their programme of study or discontinuing it, or the closure of either IFG, one or more of its teaching centres or one or more of its partner centres;
- ❖ take all reasonable steps to protect students' studies should a decision be taken to discontinue a programme, or in the event of the closure of one or more teaching centres or partner centres;
- ❖ consider the individual needs of all students and the impact on them of any proposed changes and any steps taken to protect their interests, making reasonable adjustments as appropriate;
- ❖ ensuring that applicants to IFG programmes are promptly notified in writing via email/letter delivered via email, in the event of a Significant Incident that has or will have a bearing on the applicable programme of study and/or wider IFG services and facilities (eg closure of an IFG building relevant to the delivery of the advertised programme). Where relevant, cooling periods will be reset from the date of such email notification for applicants holding an accepted confirmed offer';
- ❖ compensating applicants appropriately where applicants can demonstrate that they have incurred costs as a result of having formally accepted a place with IFG and the offer is materially different to the offer accepted by the applicant.

Equality Impact Assessments (EIAs)

As part of IFG's commitment to embedding inclusive practices and removing barriers for all students, not only those from underrepresented groups, IFG carries out Equality Impact Assessments (EIAs) where appropriate. EIAs enable the College to identify potential or existing barriers and to proactively consider and implement reasonable adjustments. This supports the College in meeting its anticipatory duty under the Equality Act 2010.

EIAs may be conducted in relation to both student and staff matters for key policies and student experience matters.

See Appendix A within IFG's Equality Impact Assessment Template and Guidance.

Refunds and Compensation for students arising from Significant Incidents

In the event that a Significant Incident disrupts IFG's Business Continuity leading to potential or actual claims by students for refunds and/or compensation, such claims will be dealt with in accordance with the IFG Refund and Compensation Policy and its procedures.

Significant Incidents leading to IFG being unable to preserve continuation of study

In Annex 1 to this Business Continuity Plan, we have set out possible situations where we would no longer be able to preserve the continuation of study for one or more students, or where there has been significant material disruption to a programme of study. Whilst overall our assessment of the likelihood of these events is low, we acknowledge that in the event that we are unable to preserve the continuation of study or where there has been significant material disruption to an IFG programme of higher education, we will give holistic consideration to each individual student's circumstances in determining where a refund and/or compensation (financial or otherwise) is warranted.

As per our Refund and Compensation Policy, where a student is seeking compensation, this may not necessarily mean financial compensation in all instances. There are various ways in which we might resolve problems, and where it is appropriate and reasonable to offer alternatives to financial compensation, these will be considered. These include:

- Teaching out (where future recruitment to a programme of study is either temporarily or permanently stopped, but IFG ensures that the delivery of the programme continues as advertised to students already enrolled on it, potentially with reduced/different staff)
- Transfer to another programme of study delivered by IFG
- Transfer to another programme of study delivered by an IFG partner
- Facilitated transfer to another programme of study delivered by an alternative provider
- Full or partial financial refund of fees
- Financial compensation of associated costs

Refund and compensation claims by students in these circumstances will be managed in accordance with our Refund & Compensation Policy, and by:

- Using our cash Reserves, where necessary
- Ensuring that we have appropriate insurance in place
- Having a 'fast-track' process where continuation of education cannot be preserved which means that students do not have to claim refunds and compensation from us but where we proactively identify affected students and ensure that they are informed, refunded and compensated appropriately

In the event that a student or group of students are dissatisfied with their refund/compensation proactively put in place by IFG, they have the right to bring an individual or group complaint under the Student Complaints Procedure. The provision of any refunds and/or compensation (whether financial or otherwise) by IFG do not affect students' rights of complaint under the IFG Student Complaints Procedure.

Overview of Business Continuity Procedures

Management of Significant Incidents

IFG has in place a risk-based approach for evaluating and managing incidents that may impact, compromise or prevent business continuity. This comprises:

- **Appendix A: Significant Incident Management Team Roles and Responsibilities Matrix**
A designated Significant Incident Management Team (SIMT) for leading and managing critical or other significant/major incidents affecting IFG, and ensuring an appropriately coordinated response and communications (details, including membership and key roles and responsibilities are set out in Appendix A)
- **Appendix B: Significant Incident Management Plan**
A Significant Incident Management Plan (set out in Appendix B), that provides a set of risk-based protocols for IFG to follow, including triggers for and levels of involvement of the SIMT. The Significant Incident Management Plan will be activated as set out below and carried through by the SIMT:
 - **STAGE 1:** Incident Assessment and Escalation Procedure
 - **STAGE 2:** Significant Incident Management Team Procedure and Protocols, including instigation of Emergency Closure Protocols if necessary. This is a 4-step procedure:
 - Step 1 - SIMT ESTABLISHMENT
 - Step 2 - SIMT EVALUATION
 - Step 3 - SIMT RECOVERY AND RESTORATION
 - Step 4 - SIMT WRAP-UP
 - **STAGE 3:** Post-Incident Review
- **Appendix C: IFG Emergency Closure Protocols**

Emergency Closure Protocols (set out in Appendix C), to be followed in the event of physical campus closure;

- **Appendix D: IFG Dpt/Area-Specific Recovery Plan Template**

Department/Area-specific Recovery Plans, to ensure that critical business functions particular to academic and non-academic departments, services/service areas, and programmes, are proactively identified and ready if needed to support the full activation of the Significant Incident Management Plan.

Responsibilities

Key roles and responsibilities of the Significant Incident Management Team regarding ensuring/restoring business continuity through implementing the Significant Incident Management Plan and Emergency Closure Plan are set out in Appendix A to this Business Continuity Plan . The responsibilities set out below concern this Business Continuity Plan:

Body	Responsibilities
Board of Governors	<ul style="list-style-type: none"> ● Safeguarding the assets of IFG and overseeing the procedures in place for managing business risks (eg Institutional Risk Management Policy, Institutional Risk Register) ● Deciding the overall risk appetite of IFG and influencing the culture of risk management within IFG, including the level of acceptable risk on a case-by-case basis ● Periodically approving this Business Continuity Plan following review, advice and guidance by Risk, Audit & Compliance Committee ● Making Reportable Events to the OfS where applicable in the context of this Business Continuity Plan
Risk, Audit & Compliance Committee	<ul style="list-style-type: none"> ● Advising the Board of Governors on risk management and governance, and the system of internal controls ● Periodic reviews, updates, amendments and recommended approval of this Business Continuity Plan to the Board of Governors ● Providing advice to the Board of Governors on the effectiveness of the internal control systems and mitigations, whether in response to a significant incident or as part of ordinary business ● Receiving and considering detailed reports and/or updates relating to any business continuity issues
Leadership Team	<ul style="list-style-type: none"> ● Instigating the Business Continuity Plan and any of its mechanisms in the event of a significant incident, perceived or actual risk ● Any decision on the closure, or part closure of the IFG London campus ● Oversight of student and staff communications in the event of the Significant Incident Management Plan being implemented ● Taking action to ensure the institutional duty of care to students is met ● Identification and prioritisation of critical business processes within IFG and the business impact assessment of the loss or impairment of these processes ● Overseeing the IFG business continuity arrangements, flagging/reporting any concerns/Reportable Events to the Board of Governors as soon as they are identified
CEO & Academic Director	<ul style="list-style-type: none"> ● The development and maintenance of the Business Continuity Plan on behalf of Risk, Audit & Compliance Committee ● The upkeep and communication of an Emergency Closure Plan, which deals with the communication process for closing the IFG London campus ● The testing and rehearsal with the Significant Incident Management Team (SIMT) of the Significant Incident Management Plan, Emergency Closure Plan and any other associated mechanisms of this Business Continuity Plan

Significant Incident Management Team Chair	<ul style="list-style-type: none"> Formally declaring an incident in accordance with the protocols of the Significant Incident Management Plan Convening and managing the SIMG during an incident Involving other relevant personnel not named in the SIMG as relevant (eg administrative staff, security staff) Gathering all area-specific recovery plans and disseminating these to the Significant Incident Management Team Formally declaring an incident over, deactivating the active SIMG and allowing the plan to be closed down, in accordance with the protocols of the Significant Incident Management Plan Instigating, arranging and leading a post-incident review at a time agreed by the Board of Governors and normally not more than 2 months after the formal declaration of the incident being over
Significant Incident Management Team	<ul style="list-style-type: none"> The implementation of the Significant Incident Management Plan - and where necessary the Emergency Closure Plan - during an incident. All Team members should have confirmed easy access to these documents (or a copy thereof) both at work and at home Engaging as necessary with the Post-Incident review Feeding back to the Risk, Audit & Compliance Committee any issues or recommendations arising from the implementation of the Significant Incident Management Plan, Emergency Closure Plan and/or the Post-Incident Review
Heads of Departments / Senior Managers	<ul style="list-style-type: none"> Raising awareness of business continuity in their teams and departments and distributing relevant information and materials to their teams Having their own area-specific recovery plan and/or considerations to facilitate IFG emergency responses and business recovery (see Appendix D: IFG Dpt/Area-Specific Recovery Plan Template) Ensuring that their staff are aware of what training is needed and that this has been completed with the timeframes required by IFG
All IFG staff members	<ul style="list-style-type: none"> Ensure that they operate at IFG in such a way as to minimise the risk of a business disruption or continuity incident occurring Alert their line manager to any real or perceived risk which may impact on the business continuity of IFG, even if they are not certain about it Complete all training required by IFG within the specified timeframes, including but not limited to training specific to this Business Continuity Plan (eg Health & Safety training)
IFG Franchise Partners	<ul style="list-style-type: none"> Having a local Business Continuity Plan that is reviewed and approved by IFG Board of Governors Having clear emergency protocols in place that trigger IFG being immediately contacted in the event of actual or perceived significant Business Continuity risk(s) and/or Significant Incident occurring Ensuring that clear emergency arrangements for communication with students are in place Ensuring staff are trained appropriately for the arrangements under the local Business Continuity Plan to be correctly followed

Business Continuity, Significant Incidents and Post-Incident Review and Record-Keeping

Significant Incidents - Post-Incident Reviews

Following the formal declaration by the Significant Incident Management Team (SIMT) Chair that a Significant Incident is over, the Chair will proceed to organise a Post-Incident Review. The purposes of the Review will be to:

- Consider how well the Significant Incident Management Plan worked, identifying areas of strength and weakness or vulnerability, providing an overall assessment of success and making recommendations to the Board of Governors (to be addressed through the Risk, Audit & Compliance Committee)
- Consider, if applicable, how well the Emergency Closure Plan worked, making any necessary recommendations to the Board of Governors (to be addressed through the Risk, Audit & Compliance Committee)
- Identify any necessary actions for IFG/the Board of Governors to take, with a risk level/urgency rating
- Identify any training needs, with a completion timeline
- Review and, if necessary, update Table 2 ‘Incident Categorisation’ in Appendix B to ensure accuracy in light of any knowledge gained as a result of the incident

A Post-Incident Review will normally be held within 2 months of the date of the Significant Incident being formally declared over by the SIMT Chair, and will result in a confidential report (see below) to the Board of Governors and Senior Leadership. It is at the discretion of the CEO and Academic Director as to whether the report is disseminated to other staff either in full or in part.

Post-Incident Review Report

Following the Review, the SIMT Chair will complete a confidential Post-Incident Review Report to the Board of Governors, that comprises the findings and any recommendations arising from the Post-Incident Review. The report will be received by the full Board but will be considered in depth by the Risk, Audit & Compliance Committee, who will recommend to the Board whether the recommendations in the report should be implemented (together with any prioritisation and any relevant considerations).

‘Table 2: Incident Categorisation’ in Appendix B should be reviewed and if necessary updated as part of completion of a Post-Incident Review.

Record Keeping

IFG holds a Register where all Significant Incidents impacting on IFG’s Business Continuity will be recorded, even in the event the matter does not require formally reporting to an external authority . The register will be maintained by the CEO/Academic Director on behalf of the IFG Board of Governors.

In addition, where the Significant Incident Management Team has been invoked, the Post-Incident Review will constitute the formal IFG record of that Significant Incident.

Training and Communication

All members of the IFG Board of Governors and Senior Leadership of IFG will receive awareness training on this Business Continuity Plan.

The CEO & Academic Director is responsible for organising and overseeing the testing and rehearsal with the Significant Incident Management Team (SIMT) of the Significant Incident Management Plan, Emergency Closure Plan and any other associated mechanisms of this Business Continuity Plan.

In the event of any update to this Business Continuity Plan, the Significant Incident Management Plan, Emergency Closure Plan or any other associated mechanisms of this Business Continuity Plan, a new test/rehearsal as applicable and necessary will be put in place.

IFG BUSINESS CONTINUITY PLAN

ANNEX 1 - ASSESSMENT OF RISKS TO CONTINUATION OF STUDY

TABLE 1 - Risk assessment of risks to continuation of study and relevant student continuation

Below, we have set out in Table 1 a risk assessment of the range of risks to continuation of study for IFG students, probability of the risk occurring, how these risks may differ based on individual student needs, characteristics and circumstance, and the mitigations we have in place as well as the overall risk assessment level:

RISK	Likelihood of risk occurring	Relevant Information supporting the assessment of risk level	Relevant IFG student considerations	IFG Mitigations in place	Risk Assessment Level
<ul style="list-style-type: none"> ● Closure of IFG due to financial or business reasons, or due to Acts of God 	Low	<p>We assess this risk as low because:</p> <ul style="list-style-type: none"> ● We have stringent risk management mechanisms in place, including appropriate financial auditing and governance oversight measures which assure us that finances and funding are in good health and are long-term sustainable ● We have a strong student recruitment strategy designed to ensure that we are targeting and marketing our programmes for established key audiences already well-known to us ● We have Reserves in place designed to support IFG to weather any unexpected disruptions for a period of 12 months ● The risk of closure due to fire, flood or other ‘Act of God’ is mitigated by the contingencies in our Business Continuity Plan 	<ul style="list-style-type: none"> ● Location of IFG students and IFG partner students would necessitate carefully coordinated communications ● Some students may require additional support measures to understand impact and next steps, subject to any SPLDs or other conditions / disabilities ● IFG may need to work with other HEIs (including any validation or franchise HEI partner) or pathway providers to support continuation of study in some form, where feasible and appropriate, and student needs would need to be adequately communicated 	<ul style="list-style-type: none"> ● Business Continuity Plan ● External and internal financial auditing ● Governance including monitoring of financial health, sustainability and compliance ● Student recruitment strategy regularly reviewed and currency maintained, flexing targeted approaches appropriately 	LOW
<ul style="list-style-type: none"> ● Closure of the IFG London Campus due to loss of 	Low	<p>We assess this risk as low because:</p> <ul style="list-style-type: none"> ● Rental teaching space in London is readily available and IFG would be able to source suitable premises relatively quickly ● All IFG Pathway Programmes are also delivered 	<ul style="list-style-type: none"> ● Where the IFG London campus closes, students could be transferred to online delivery. ● However, online delivery may not be suitable for all students, so consideration will be given to 	<ul style="list-style-type: none"> ● Rental teaching space in London is relatively easy to source ● One unified curriculum including online and at partner centres 	

rental premises		<p>online and mostly delivered by IFG London teachers (which can be done from home). Therefore students can be switched to online teaching both short and long term and be assured that they will receive exactly the same programme and standard of teaching with minimal disruption. If IFG London teachers are unavailable then staff at our franchise partner in Abu Dhabi would be able to assist as we have a very close working relationship with the centre management and teachers.</p> <ul style="list-style-type: none"> • Transfer to an IFG Partner Teaching Centre, in the UK - 2 partners in London and one in Birmingham would also be an option for students wanting to continue face-to-face tuition until the issue is resolved. • For HE students, teachers can teach online for a short duration until new premises are found • Our governance oversight and monitoring provides us with the requisite assurances of the current financial and associated business and pedagogic health for our London operation 	<p>individual student suitability.</p> <ul style="list-style-type: none"> • Students who require/prefer face-to-face will have transfer option to transfer to a course at an IFG teaching centre in the UK • For students on a HE programme, online or transfer to a partner teaching centre may not be possible and so IFG would work with other HEIs, with initial discussions with any validation partners, to find a suitable alternative 	<ul style="list-style-type: none"> • If IFG London is forced to close for a short time then teaching can be online or face-to-face at an IFG partner teaching centre (for pathway students) • If online tuition is not viable for HE students IFG would seek help from any validation HEIs 	
<ul style="list-style-type: none"> • Closure of one or more of our partner teaching centres 	<p>Medium</p>	<p>We assess this risk as medium because:</p> <ul style="list-style-type: none"> • Whilst we do not foresee any closures ahead at the time of completing this risk assessment, we acknowledge that some of our partner teaching centres are located in countries close to other countries which are currently experiencing relative instability. There is no suggestion at the current time that any of these partner centres are at risk, but we make this assessment being mindful of the wider geopolitical climate. 	<ul style="list-style-type: none"> • Where one partner centre closes, students could be offered comparable transfer to another partner centre or IFG London for online delivery. However, online delivery may not be suitable for all candidates, so consideration should be given to individual student suitability. 	<ul style="list-style-type: none"> • One unified curriculum across all delivery sites including partner centres • If one partner centre closes, students could be offered comparable transfer to another partner centre or an IFG teaching centre for either in-person or online delivery. 	
<ul style="list-style-type: none"> • Programme Closure 	<p>Low</p>	<p>We assess this risk as low because:</p> <ul style="list-style-type: none"> • the risk that we would need to close a programme of study before all relevant enrolled students have completed it is highly unlikely. Our student recruitment strategy is 	<ul style="list-style-type: none"> • Where a programme of study is due to close and there remain existing enrolled students, a transfer to a suitable alternative programme may be offered. In this 	<ul style="list-style-type: none"> • Student recruitment is consistently strong and IFG is familiar with its key markets and core targets • Student recruitment numbers are monitored and 	

		aligned to speak directly to our programmes of study and our records show continuous strong recruitment.	case, any individual student needs should be mapped out together with transfer arrangements to ensure a smooth transfer.	recruitment strategy is flexed accordingly <ul style="list-style-type: none"> ● If a programme needed to close it would be highly unlikely to close across all delivery sites including partner delivery sites ● In the unlikely event of a programme closure, IFG commits to 'Teaching out' students who are currently enrolled, and it would normally be expected that this would take place via their enrolled location, although in exceptional circumstances teaching out may move to online delivery or be provided at another delivery site (students will, where appropriate, be offered the choice) 	
<ul style="list-style-type: none"> ● Unable to deliver material components of our programmes 	Low to moderate	<p>We assess this risk as low to moderate because:</p> <ul style="list-style-type: none"> ● our educational delivery lies within specific disciplines that do not rely on specialist equipment, and our composition of having both different delivery centres, a unified syllabus and online provision means we can easily provide temporary staff backfill where necessary ● Malware/Cyber-attacks can happen to any institution. IFG has stringent network and IT security in place, including back-up systems and separate staff and student intranet areas. 	<ul style="list-style-type: none"> ● Where material changes to programmes occur that constitute a change to the student contract, communication to affected students must be in accordance with consumer law requirements and accessible to all relevant students 		