



Business Continuity Plan

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This document provides information, guidance and templates to support the development of an individual academy Business Continuity Plan.

Version History

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Section One - Business Continuity Planning Guidance

1. Background

The aim of a business continuity plan (BCP) is to help staff respond effectively in recovering services and premises after an emergency incident has occurred. While it is hoped that few academies will experience a major crisis, it is still important to plan what you would do to recover from one if required to do so. This document is designed to supplement the academy Critical Incident Plan (CIP) not replace it.

It is therefore important to ensure that you have read and that you understand the Critical Incident and Business Continuity Planning Framework (FR8) and the Critical Incident Plan Template Document (TP6)

Parents, staff and pupils have an expectation that senior managers and the Trust will prepare for and implement recovery procedures in the event of a major incident/loss and or disruption to premises, infrastructure or staff, which will as far as practical, minimise disruption and ensure the recovery phase is undertaken efficiently. Effective forward planning can prevent adverse impact on the academy's reputation and ensure that any disruption to the education of children is minimised.

The purpose of a business continuity plan is to ensure that critical activities are identified and resumed as quickly as possible and continue to be delivered during a critical incident, and or an interruption or disruption to normal academy operations. A business continuity incident or disruption can occur at any time and can be externally imposed or internally generated e.g. criminal activity, utility failure, adverse weather, foot and mouth, flu outbreak, flooding, industrial action, intruder or fire could all be potential examples.

This guidance is designed to offer generic information and tools to identify potential crises, and plan for the continuity of service delivery in the event of an incident occurring. The guidance and templates in the toolkit will help the academy to prepare their own unique plans. A carefully thought-out plan will make coping in a crisis easier and assist in keeping any disruption to a minimum.

2. Defining Business Continuity Planning

Business Continuity is a management process that helps to manage risks and the smooth running of an academy, ensuring that it can continue to operate in the event of a disruption. Business Continuity is defined in the Civil Contingencies Act 2004 (sec 6.39) as:

'the strategic and tactical capability of the organisation to plan for and respond to incidents and business disruptions to maintain continuity of business operations at an acceptable predefined level'.

Business continuity planning can help to

- Prepare for, identify and mitigate potential incidents and get back to normal quickly
- Maintain the provision of education and welfare of children and staff
- Minimise the impact on children, staff and the wider community
- Support the response to an incident by ensuring that critical activities can be maintained
- Assist in recovering from an emergency

Business Continuity Planning, can be the planning process wherein we ensure key or critical services can continue to function in the event of an incident or set of circumstances. These may include:

- Loss of staff (due to illness, industrial action etc)
- Loss of systems (e.g. IT & telecoms)
- Loss of utilities (e.g. electricity, gas, water and heating)
- Loss of or access to premises
- Loss of key suppliers (contractors, catering, transport etc)
- Crime and disorder

3. Business Continuity Management (BCM)

Business continuity management is a commonly recognised management practice and provides a framework to improve academy resilience; it has been defined in the Civil Contingencies Act (Sec 6.41) as:

‘a holistic management process that identifies potential threats to an organisation and the impacts to business operations that those threats, if realised, might cause. It also provides a framework for building organisational resilience with the capability for an effective response that safeguards the interests of its key services’.

Business continuity management involves managing the recovery or continuation of activities in the event of a disruption, through planning, training, exercises and review, to ensure business continuity plans stay current and up-to-date.

The British Standard for business continuity works on a six-stage process widely acknowledged as best practice, the information provided within this section of the toolkit is based on this generic framework. This standard provides a good basis for managing business continuity and includes:

| The 6 stages of BCM | What does this mean in practice? |
|--|--|
| Stage 1. BCM Programme Management | <ul style="list-style-type: none"> To be led by / full participation of senior management / trust board To establish the academy approach and policy to Business Continuity Undertake the task as you would any key project |
| Stage 2. Understanding the Academy | <ul style="list-style-type: none"> Identifying academy functions and critical activities, resources and needs Identifying the impact if there is loss of identified functions and critical activities or resources over time Considering impact of identified risks in respect of the academy's critical activities (through effective risk management / registers / processes) Ensuring that Business Continuity is aligned to academy objectives and statutory duties Supporting academy improvement planning |
| Stage 3. Determining BCM Strategy | <ul style="list-style-type: none"> Identifying strategic options and contingency plans for academy's critical activities considering: <ul style="list-style-type: none"> People (e.g. multi skilling, succession planning and use of contractors) Premises (e.g. alternatives, remote working, provision of homework for pupils) |

| | |
|---|--|
| | <ul style="list-style-type: none"> - Technology (e.g. backup, remote access, equipment type/age) - Information (e.g. confidentiality, availability and currency) - Suppliers (e.g. contract/service level agreements, risk assessment, dual sourcing) - Stakeholder relationship management (governors, parents, community) • Senior Managers/trust should agree/sign off contingency plans/strategies |
| Stage 4. Developing and Implementing BCM Response | <ul style="list-style-type: none"> • Developing plans including- <ul style="list-style-type: none"> - Critical Incident Plan (CIP) - Business Continuity Plan (BCP) - Business Recovery Plan (BRP) |
| Stage 5. Exercising, Maintaining and Reviewing | <ul style="list-style-type: none"> • Ensuring plans are fit for purpose by verifying arrangements / plans through exercises. Exercises may be – <ul style="list-style-type: none"> - Simple, desk-based checks / review of documents - Walk through of plans using artificial situations (scenarios) - Complex scenario based live exercise including incident management. • Exercises must be realistic, planned, agreed with stakeholders to ensure minimum disruption and maximum learning. • Exercise aims, objectives and outcomes should be agreed with senior managers in advance. • Post exercise, debriefings should take place to ensure learning is gathered and plans amended accordingly • Plans should be maintained and kept up to date to ensure that in the event of an emergency, academy can respond effectively. This is an ongoing process, and an individual should be identified as being responsible for this. • Plans should be reviewed annually by the Directors/Leadership Team. |
| Stage 6. Embedding BCM in the Academy Culture | <ul style="list-style-type: none"> • Business Continuity becomes part of the culture of the organisation through – <ul style="list-style-type: none"> - Directors/Leadership Team - Assigning clear responsibilities - Awareness raising - Skills training - Exercising and planning • Sharing plans with key third parties/partners or stakeholders as appropriate • Considering BCM and Risk Management in all academy plans/policies • Promoting Business Continuity both within and outside the academy. |

4. Business Recovery

The Civil Contingencies Act, Emergency response and recovery document (sec 5.1.3) defines recovery as:

'the process of rebuilding, restoring and rehabilitating the community following an emergency'

Recovery is also an opportunity to regenerate, transform or revitalise both from a visual and psychological perspective an organisation following a significant incident or event.

The impact of emergencies affects more than those directly affected (e.g. injury, loss of property, evacuation etc). Emergencies affect, for example, onlookers, the family and friends of fatalities or survivors, response and recovery workers, and the wider community, as well as the wider economy and businesses, local physical infrastructure, and the environment. The process of recovery is an enabling and supportive process and is most effective when there is an integrated approach with all key stakeholders having and understanding the role they can play and where the community is fully engaged.

5. Key Tasks in Creating the Business Continuity Plan

Incident Management

The academy 'Critical Incident Plan (CIP)', should not be viewed in isolation but as part of the overall continuity arrangements for the academy, it will include information useful if the academy BCP must be evoked, for instance: (refer to documents FR* and TP6 for CIP information)

- The Incident Management Team, their roles and responsibilities.
- Contact Details for academy, staff, AIC members and other external stakeholders and agencies that can support the academy in managing a critical incident.
- A Communication Plan
- Details of how plans are activated in academy and on educational visits
- Evacuation, shelter and lockdown procedures including evacuation plans and maps to places of safety
- Location and contents of the critical incident evacuation box/bag
- Site information and plans
- Checklists and required actions/documentation for use in an incident

Incident Management Team (IMT)

An IMT will have been identified as part of the academy Critical Incident Planning process and will be made up of staff and AIC members with the knowledge, skills, experience and decision-making capability to manage an incident. It will also identify who will take the lead responsibility for:

- Creation and development of Business Continuity plans. These plans should be signed off by the Directors/Leadership team and the Trust Board.
- Business Continuity Management during an emergency. The Principal will usually be responsible for managing and co-ordinating the emergency and business continuity response, however this cannot be accomplished without suitable support. It is useful to identify another member of the IMT to take a lead on BCM to ensure critical activities are maintained in the absence of the Principal/Academy Business Manager (ABM).

It may be necessary to consider if the IMT has the full range of roles and responsibilities to deal with any resulting disruption following an emergency. Typically, the following roles will be required during a disruption to normal business –

- Business Continuity lead co-ordinator
- Communication (internally and externally and to include –
 - Community and stakeholder liaison (including staff & parents)
 - Media Liaison
- Pupil Welfare including children with special educational needs
- Staff ongoing welfare
- Premises management which may include relocation/rebuilding/continuing security

- Maintenance of critical services and statutory duties e.g. IT & Telecoms or ensuring teaching and learning can take place if the academy is temporarily relocated or provision of work to children at home in the event of not having a building for a period of time.
- Log keeping, ensuring that notes of key decisions and actions are recorded due to the potential for litigation or financial loss.
- Health, Safety, Risk & Resource Management

Impact Analysis

It is important to identify and record the critical functions and activities that the academy provides, and the support processes needed for these functions to continue. This process will help identify:

- Key activities and the impact if these were stopped
- The recovery timescale if the activity was disrupted
- How vulnerable key activities are to a range of potential threats and the mitigation strategies that may be required/should be in place

This information should be documented in the Function Analysis section of the Business Continuity Plan; a template is provided to help you record your analysis.

Critical Activities

Critical activities or functions can be defined as **“any activities whose loss would have the greatest impact in the shortest time and therefore need to be recovered most rapidly”** (BS 25999-1 sec 6.3)

Factors to consider when assessing the critical nature of activities/functions may include -

- Activities which support the health, welfare and safety of staff and pupils
- Statutory or legislative functions (e.g. safeguarding)
- ICT infrastructure and systems
- Finance and other resources
- Environmental implications
- Building Management functions
- Reputational impact

It can be useful to identify set criteria to use to agree what activities are defined as critical, this will ensure a consistent approach to the analysis and ensure the academy can continue to function during and post incident.

Critical Activities Assessment Tool may look like this:

| If an activity answers 'yes' to any of the statements below, it will be considered critical to our academy |
|--|
| 1. Contributes to the well-being and/or safety/safeguarding of students or academy staff |
| 2. A Statutory function connected with safeguarding requirements / health and safety |
| 3. Provide for other statutory services not included in 1 or 2 above |
| 4. Ensures effectiveness of key ICT infrastructure and systems |
| 5. Safeguards the financial viability of the academy |
| 6. Safeguards the longer-term reputation of the academy |
| 7. Insert any academy specific statements here |

Once critical services have been identified and you have recorded these it will be necessary to consider the level of impact over time if these services are lost or not available, you will need to agree a system of indicators to use to assess their critical nature and the maximum time the academy can be exposed to the loss before agreed mitigation strategies must be undertaken. You will need to periodically review your policy and your impact analysis assessment; your review period should be identified within the policy document for the academy.

An example Impact Matrix* may look like this:

| Impact Analysis Rating | Potential Indicators | Expected Acceptable Recovery Period |
|------------------------|---|-------------------------------------|
| RED / HIGH | Service significantly affected if loss of up to one day <ul style="list-style-type: none"> • Small reduction in staff will mean ceasing the service in whole or in significant part • Health and Safety of staff and students put at risk • Organisation suffers severe reputational embarrassment for service failures • Organisation could incur significant legal claims / fines / costs for non-delivery of service • Organisational electronic communication internal and external at risk of failure | <0.5 days |
| AMBER / MEDIUM | Service significantly impacted if loss of up to 3 days <ul style="list-style-type: none"> • Service can continue to operate with medium loss of staff • Some impact on services to the students / customers • Some embarrassment for service non-delivery to the students / customers | <1.5 days |
| GREEN / LOW | Service significantly impacted if loss is over one week <ul style="list-style-type: none"> • Services more likely to be support functions | <5 days |

You may wish to add in or change the indicators and or recovery periods to meet your individual academy needs.

ACADEMY IMPACT ANALYSIS TEMPLATE

| | |
|--|--|
| Identified Critical Activity/ Location or Resource: | |
|--|--|

* refer to Impact matrix section

| Specify the impacts of disruption for the critical function/ activity identified | Specify Impact H/M/L* | Time Impact (specify maximum recovery time) | State Mitigation Actions If Recovery Exceeds Maximum Recovery Time |
|--|-----------------------|---|--|
| | | | |

| | |
|--|--|
| Identified Critical Activity/ Location or Resource: | |
|--|--|

* refer to Impact matrix section

| Specify the impacts of disruption for the critical function/ activity identified | Specify Impact H/M/L* | Time Impact (specify maximum recovery time) | State Mitigation Actions If Recovery Exceeds Maximum Recovery Time |
|--|-----------------------|---|--|
| | | | |

| | |
|--|--|
| Identified Critical Activity/ Location or Resource: | |
|--|--|

* refer to Impact matrix section

| Specify the impacts of disruption for the critical function/ activity identified | Specify Impact H/M/L* | Time Impact (specify maximum recovery time) | State Mitigation Actions If Recovery Exceeds Maximum Recovery Time |
|--|-----------------------|---|--|
| | | | |

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Risk Assessment

Having completed the Academy Impact Analysis (AIA) and identified the key critical functions, you can use this information to assess the overall risk to the academy if this function/activity was unavailable for longer than the specified maximum recovery time. It is not practical to manage every risk an academy faces but you may wish to include those key to the operation of the academy on to the academy's action plan and how these will be managed.

Training, Exercising and Reviewing

Once the plan is completed and has been agreed and signed off it should be communicated to all staff and any relevant training provided, in addition those involved in managing an incident and or supporting the academy's recovery should be familiar with what will be expected of them in the event of a disruption. The plan should be reviewed, updated and tested in line with the requirements set out within the document. The idea of exercising and reviewing the plan will support further development of it.

Recording Actions

In the event of an incident or disruption to service that requires the BCP to be activated all key actions taken and decisions made should be recorded on the appropriate log sheet. A sample log sheet is provided within this document. The BCP should be treated as a controlled document as it holds sensitive and personal information; the plan should therefore be held/kept securely by those who have access to it.

It is possible that you may have the same individuals on your critical incident management team as those on your BCP team, and these people will be responsible for the same roles when managing a business continuity disruption as they would a critical incident, this must however be clearly defined to avoid confusion. You may want to either keep the two documents (CIP & BCP) separate, and repeat contact/key information in both documents or to have a business continuity and recovery plan included within your critical incident plan documentation. If the information is readily available and understandable to those people that need it, either approach is acceptable, therefore each academy should decide what format is suitable for and meets their individual needs.

Introduction and Background

The Enquire Learning Trust (Trust) takes the safety and welfare of everyone on our site seriously and in the event of an incident or emergency either on site or involving our staff and pupils off site (undertaking academy related activities) we will invoke emergency procedures in line with our policies and plans.

Our Estates Officer (EO) takes the responsibility in our Trust for providing each academy school with a template Critical Incident Management Handbook and for putting a Business Continuity Policy and Plan (BCP) in place. **The Trust** aims to protect the wellbeing of its children and staff by providing a safe and nurturing environment.

The Trust have drawn up a BCP as one element of the academy's policies and plans for the management of incidents/emergencies and disasters. Our EO will take the lead on the development and implementation of our plan.

A BCP is required to ensure the continuance of critical business functions following a loss or service or disruption to systems or other unforeseen events.

Definition of 'Business Continuity Management'

The Trust recognise business continuity management as, 'a holistic management process that identifies potential threats to an organisation and the impacts to business operations that those threats, if realised, might cause. It also provides a framework for building organisational resilience with the capability for an effective response that safeguards the interests of its key services'

Aim

The aim of the Trust BCP is to identify critical processes, the maximum exposure time our academy can cope with a disruption to these functions/activities and how our academy will respond in the event of the loss of one of these functions/activities. This will assist our academies management and staff to react quickly and effectively in the event of a disruption/loss, enable us to maintain a sense of control and to ensure that the effects can be minimised and a return to normality can be achieved as soon as practically possible.

Incident Management Team (IMT)

An IMT will be established following the initial audit/review by the Trust central team. The members of the team are selected on a voluntary basis and will be determined by the type of disaster. Directors/Leadership Team will meet annually to review and update the policy and plan. Each member of Leadership Team has dedicated responsibilities and is provided with key Critical Incident & Business Continuity information.

Activation of the Plan

Information from the Critical Incident handbook will be used to help support individual academies manage an emergency situation. In addition, the Trust BCP will be activated if, following a critical incident, the IMT decide recovery cannot be achieved without additional support and or is likely to take 3 days or more, the decision to activate the BCP will be collective taken by the Trust, under the direction of the trust executive director.

The Trust will have the responsibility of identifying and recording the functions and critical activities that the academy provides and the support processes needed for these functions. This information will be documented as part of the business continuity management process of our Trust.

Critical Activities

Our Trust defines a critical activity or functions as “any activities whose loss would have the greatest impact in the shortest time and therefore need to be recovered most rapidly

Factors we will use when considering critical activities will include:

- Activities which support the health, welfare and safety of staff and pupils
- Statutory or legislative functions (e.g. safeguarding)
- ICT infrastructure and systems (see Disaster recover plan Appendix 4)
- Finance and other resources available
- Environmental and wider community implications
- Building availability
- Reputational impact

Record Keeping

If the Trust's BCP is activated each member of the team will keep records of phone calls made and received, letters sent and received, meetings held, persons met, decisions made and the financial cost of any such actions. The Trust will co-ordinate and retain completed documentation for their academy.

Confidentiality

The management and staff of the Trust have a responsibility to protect the confidentiality of people involved and information gathered. The members of the IMT will ensure that all information gathered and retained is done so in a sensitive and confidential manner and only shared with those who are authorised to have access to it.

Consultation and communication regarding the plan

All staff have been consulted in the preparation of this policy and plan. Trustees/ Academy Improvement Committee, parents/carers representatives and pupils (as appropriate) have also been consulted. Our current policy along with our plan has been presented to all staff and is available to download from the Intranet. Each member of the incident management team has a personal copy of the plan. All new and temporary staff and volunteers working in our academy will be informed of the relevant information from the plan by the academy's principal.

The plan will be reviewed annually.

APPENDIX 1 BCP BCP EVENTS LOG

| BCP- Log of Events, Decisions and Actions | | | |
|---|-------------------------------|---------------|--|
| Completed by: | | Sheet Number: | |
| Incident Title: | | Date: | |
| Time (24hr clock) | EVENT/DECISIONS/ACTIONS TAKEN | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

APPENDIX 2 BCP **EXPENDITURE LOG SHEET**

| Financial Expenditure Log for _____ Academy | | | |
|---|--------|----------------|-----------------------|
| Completed by: | | Incident Name: | |
| Date of Incident: | | Sheet No: | |
| Expenditure Details (what, when etc) | Cost £ | Payment Method | Needed for who or why |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

TRANSACTIONS APPROVED BY: _____

TRANSACTIONS RECORDED ON FINANCIAL SYSTEM BY: _____

APPENDIX 3 BCP

This template can be used to summarise the actions to be taken to reduce the impact on key functions or critical activities in the event of an emergency interruption or disruption from the following events:

Severe Weather

| Impact | Recovery Action |
|--------|-----------------|
| | |

Communicable diseases / Illness in the community (including staff)

| Impact | Recovery Action |
|--------|-----------------|
| | |

Staff Absence, shortage (non-illness)

| Impact | Recovery Action |
|--------|-----------------|
| | |

Failure of IT, Telecommunications, Utilities (gas, electricity, water)

| Impact | Recovery Action |
|--------|-----------------|
| | |

Building Accommodation not available

| Impact | Recovery Action |
|--------|-----------------|
| | |

Fuel Disruption/shortage

| Impact | Recovery Action |
|--------|-----------------|
| | |

Major Community Emergency

| Impact | Recovery Action |
|--------|-----------------|
| | |

Other Risks specific to your academy or location (e.g. flooding, anti-social behaviour etc)

| Impact | Recovery Action |
|--------|-----------------|
| | |

Other Risks

| Impact | Recovery Action |
|--------|-----------------|
| | |

Section Two – BCP Toolkit Templates

This section contains additional templates and information that academy may find useful as part of the overall process of producing the academy critical incident (CIP) and business continuity (BCP) plan(s).

APPENDIX A Draft Adverse Weather Guidance Document

APPENDIX B CIP/BCP Control Room Generic Risk Assessment Template

APPENDIX C General Pandemic Guidance & Pandemic Continuity Plan Template

Additional Resource Materials are also Contained within the CIP Toolkit

6. Appendix A

Adverse Weather Planning for Academies

Introduction

The academy should develop procedures to ensure the business continuity of academies and settings when facing difficulties due to adverse weather (e.g. snow, storms, flooding). The priority where practically possible and safe to do so will be to remain open and maintain the provision of education and services to pupils.

The academy should remain open in adverse weather unless:

- The health and safety of pupils and staff would be compromised
- There are insufficient staff in attendance to manage the academy safely
- There is significant damage to premises, or failure of essential utilities (gas / water / electric)

A control team should be established during a period of adverse weather (this could be the academy Incident Management team (IMT) The team's core duties will be to;

- Meet daily or as required in response to an occurrence of adverse weather.
- Manage information flow between academy, parents / carers, staff, contractors, support services, the local authority and the media
- Support academy colleagues in assessing the risks and undertaking risk assessments as appropriate to ensure safety is maintained.
- Provide general guidance and support as required

Early Planning

Adverse weather can strike at any time. It is important that each academy is as prepared as possible and ready to respond, this will help to reduce the impact on the safety, wellbeing and comfort of pupils, staff and the academy community.

Reducing Risks from a Flood, Wind, Snow and Ice – Consider the Following:

Heating

- Ensure heating systems are working correctly, with attention to time switches and frost protection devices.
- Ensure adequate fuel supplies are available for oil and solid fuel fired boilers.
- Ensure the system has been serviced the academy service engineer can be contacted.

Catering

- Ensure contingency arrangements for onsite catering is in place in case deliveries or services are disrupted.

Utilities – Gas, Water, Electricity

- Liaise with providers during adverse weather to discuss the likelihood of supply disruptions etc :

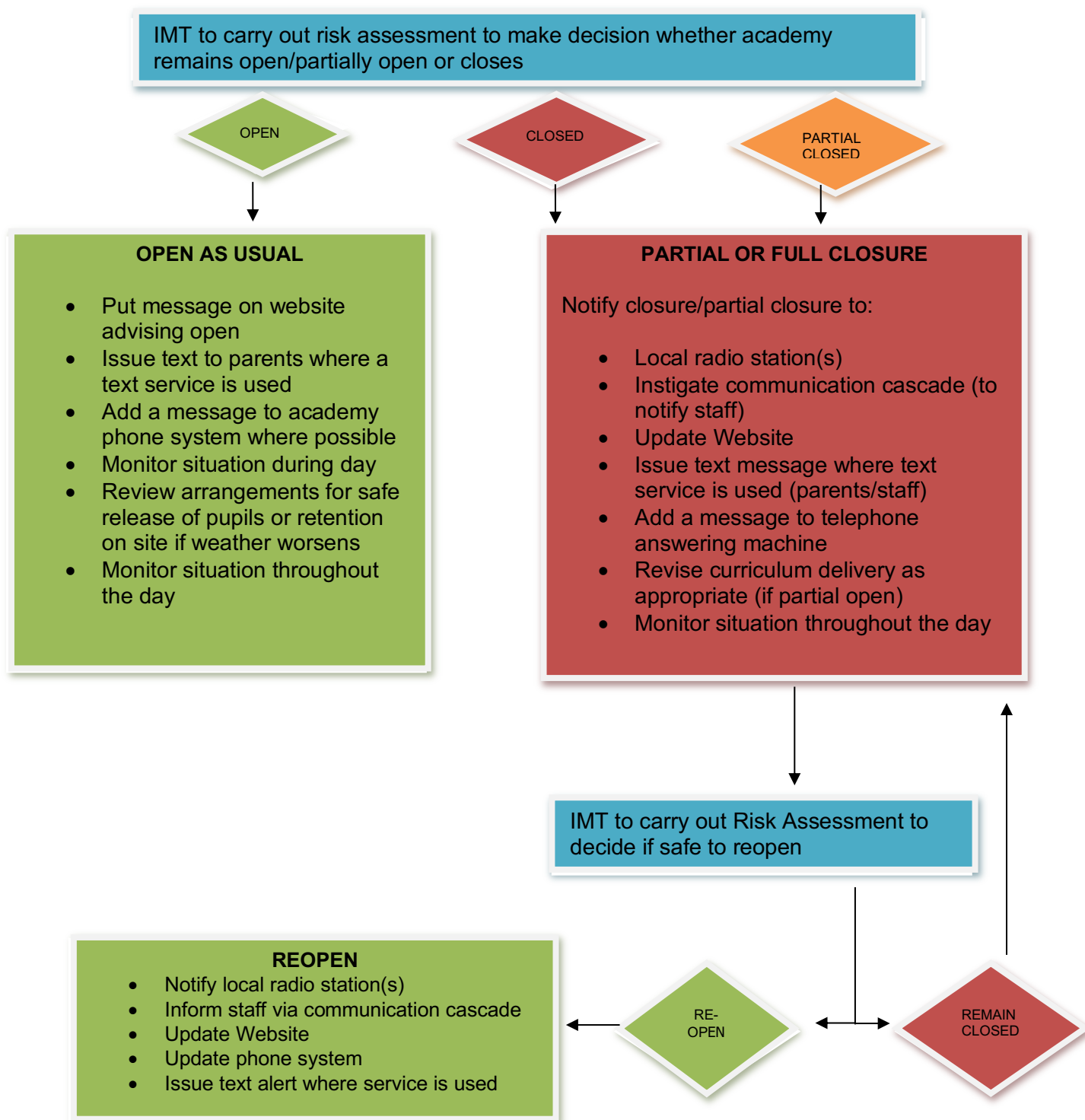
Gas
Water
Electricity

Site Management and Access (See RAN10)

- Ensure you have an appropriate snow/ice/gritting policy and plan in place (See RAN9).
- Ensure adequate supplies of grit salt are available and that the main pedestrian routes within the academy site are clear at the start and finish of the academy day.
- Ensure that any tiled areas near entrance doors are kept as dry as possible.
- Repair leaking guttering or overflows to prevent ice forming on pathways etc.
- In periods of prolonged snow check snow accumulation on flat roof and canopies and remove where practical to do so.
- In windy conditions – regular visual checks of the exterior building for any loose material such as roof coverings, gutters, masonry etc and check trees for any fallen or damaged branches, particularly close to paths, play areas or any part of the buildings.

Adverse weather warnings and advice can also be obtained from the [Met Office website](#)

General Actions to Take in the Event of Adverse Weather – Flow Chart:



General Advice on Staff Attendance at Work During Periods of Adverse Weather

Introduction

The purpose of this document is to provide advice to Principals, Academy Improvement Committees and staff at any of our academies when adverse weather conditions seriously affect employees' travel to and from work arrangements. It is acknowledged that weather conditions may affect one area more significantly than another however the academy's primary aim is to maintain the provision of education to its pupils where it is safe and practical to do so. Each academy will however develop its own individual policy to reflect individual operational needs.

Purpose

The Trust anticipates that any changes to academy opening/closing times or to action partial or full closure will only be made in exceptional circumstances by the academy Incident Management Team/Incident Controller. Decision made need to fully take account of both statutory and legal requirements to ensure the safety and welfare of staff and pupils alike.

General guidelines

- A teacher employed full time shall be available for work for 195 days in any academy year of which 190 days shall be days of which he/she may be required to teach pupils in addition to carrying out other duties. A decision to close the academy for all or part of any of these days will not therefore be taken lightly.
- When adverse weather conditions exist Principal / Academy Improvement Committee / IMT Members may need to consider reviewing academy opening and closing times, partial closures or opening the academy for staff only. If bus services and other forms of public transport are either cancelled or severely disrupted, meaning staff cannot get to work, the service that can be safely offered to pupils should be fully considered before deciding on a total academy closure.
- The decision to keep the academy open, partially or fully close because of adverse weather conditions will be taken by the Principal in consultation with Academy Improvement Committee /IMT Members. Principal could consider later academy opening times or earlier finish times to maintain a lesser disruptive service to pupils. It may also be worth considering whether certain year groups only are required to attend academy. Decisions such as these will depend on staff arrivals /numbers and whether the weather is improving or not.
- The academy will maintain a fair and equitable approach to all staff, which does not disadvantage those who have managed to attend work. It is reasonable to consider specific arrangements with staff who have disabilities.

Responsibility of Staff

All staff (teaching and support staff) have a contractual obligation to be at work unless a decision is taken by the Principal to close the academy to pupils and staff. Staff should be prepared to make alternative travelling arrangements for arriving at academy on time or as soon as possible after the normal start time should adverse weather conditions make this necessary.

Staff with disabilities, who are affected by unavoidable travel difficulties and are therefore unable to travel to and from work, may be granted special leave with pay subject to Principal approval.

It is appreciated that some staff have childcare or other domestic arrangements which may make it difficult for them to change their early morning routine to arrive on time. Delays in travel may therefore be unavoidable. However, staff must make every effort to arrive at academy on time or as soon as possible thereafter. Staff should contact their academy at the earliest opportunity if they are unable to arrive on time.

It is acknowledged that there may be difficulties for staff with long journeys. However, all staff must make every reasonable effort to attend on working days (even where pupils may not be present). Where pupils are not present staff can undertake relevant training or planning activities.

Staff unable to attend work may be asked to repay the time later following discussions with the Principal (e.g. rearrangement of a staff training day). It is important to consider how this may be achieved as clearly the Principal will need to demonstrate that staff who managed to attend work are not disadvantaged.

However, if the academy remains open to staff, it may not be possible for some categories of staff who are unable to report for work to make that time up. Such categories might include teachers, some Teaching Assistants (i.e. those on the 195 days working year conditions of service) and term time only employees. In this situation deduction from pay may be considered.

It may be possible for other full year support staff (i.e. work 37 hours or less for 52 weeks of the year) employees to take an annual leave day and to "repay" this day during non-term time.

In cases where it is not possible to repay the time, staff may have pay deducted. Each individual case will be considered on its own merits. Any decision to instruct the payroll section to affect a pay deduction will be made in consultation with all relevant parties (i.e. staff member, line manager, HR and Trade Union as appropriate).

In the event of adverse weather conditions developing during the academy day, a decision to close the academy early may need to be taken by the Principal in the interests of the safety and welfare of pupils and staff alike. Staff may be permitted to leave academy early, subject to suitable arrangements being made to ensure that the health and safety of pupils is not compromised. Staff should not be expected to make up this time later or have pay deducted.

At all times the health and safety of staff, pupils and academy users is paramount. When making decisions about maintaining a service, even if reduced, the Principal will need to consider whether access to and from the academy is safe. Equally important is access around the academy. The Principal will need to liaise with their caretaking / premises management staff to ensure adequate snow and ice clearing is provided.

It is recognised that arriving at such key decisions will not always be easy. It is therefore important that the decision about partial closure, later opening or academy closure is well planned, justifiable and clearly communicated to parents, pupils and staff as early as possible using the academy's agreed communication strategy for such occasions.

Adverse Weather – Academy Management Checklist

| BEST PRACTICE ACTION TO CONSIDER | ACTION TAKEN |
|---|--------------|
| <p>Risk Assessment <i>Assessment of risks to be undertaken when periods of when inclement weather expected.</i></p> <p>Areas to consider:</p> <ul style="list-style-type: none"> • Safety of journey to and from academy for staff and pupils • Safety of site users into, out of and around the site • Adequate supervision of pupils who arrive at academy • Safety of children who may need to be sent home early • Availability of public and other transport • Clear communication of decisions to parents/carers/ staff of decisions made • Impact on staff/pupils with disabilities • Is the weather likely to deteriorate or improve | |
| <p>Communication Strategy</p> <ul style="list-style-type: none"> • Full consultation undertaken with all stakeholders regarding policy in the event of adverse weather • Clear systems and processes in place for gathering and assessing information about conditions of roads/academy site/academy building etc • Known arrangements for staff to communicate their travel difficulties to academy • Regular updates on management decisions regarding the academy day are communicated to parents/pupils/ staff throughout the day • Arrangements in place with local radio stations to communicate ensure messages are not ambiguous • Deadlines are set by what time decisions are made and communicated about the academy's arrangements for: <ul style="list-style-type: none"> a) The morning b) The afternoon • Academy response prepared for those parents/ guardians who may be critical of the decision made | |

| | |
|--|--|
| <p>Alternative strategies to closure of academy to be considered</p> <ul style="list-style-type: none"> a) What alternative service provision can be made if full service not possible? b) Who will staff the alternative provision? c) Undertake an audit of which staff live close to the academy or are less likely to have travel difficulties (this will help establish a minimum potential staffing level). d) Are the staff in c) appropriately experienced/ trained to supervise children? e) Who will be duty holder if the Principal or other leadership team members are unable to attend academy? f) What decision-making parameters will the person in e) have? g) Is it possible to reduce the academy day and what are the implications of such a decision? h) Should some classes or year groups attend academy rather than others (e.g. examination classes)? i) Is it possible to link up with a neighbouring academy to provide a joint service? j) Can academy be closed for pupils but open for staff? | |
|--|--|

| | |
|---|--|
| <p>Monitoring and Review</p> <ul style="list-style-type: none"> • Is the frequency of review during periods of inclement weather sufficient? • Is the academy policy reviewed annually to ensure it remains relevant? • What provision is made to review the effectiveness of strategies implemented? • Are all staff clear about the policy, procedures and what action they should take in the event of being unable to attend academy on time? • What provision is made to review parental feedback about the academy's decisions? • What communication strategy do you have to explain decisions that were made to parents? • Is the policy part of the induction process for new staff and detailed in the staff handbook? | |
|---|--|

ANY OTHER INFORMATION OR COMMENTS:

Checklist Completed By: _____

Checklist Completed on: _____

Next Review: _____

7. APPENDIX B INCIDENT CONTROL ROOM GENERIC RISK ASSESSMENT

| Academy Name | | Decide who may be harmed (insert ✓): | | | | | |
|---------------------------------------|---------------------|--|---|--|----------------------------|------------|--|
| | | Student | | Contractors | | Visitors | |
| Department / Location (if applicable) | | Staff | | Vulnerable People | | Volunteers | |
| | | | | | | | |
| Identified Hazards | Initial Risk Rating | Existing Control Measures (select all that are in place) | ✓ | Actions / Comments | Residual Risk Rating H/M/L | | |
| Manual Handling | L | No manual handling will take place the room will be set up by site staff as indicated in the academy CIP/BCP | | <i>If manual handling activities are to take place a separate risk assessment will be required</i> | | | |
| Lone Working | TBA | A separate lone working risk assessment will be undertaken as necessary | | | | | |
| Slips/trips/falls | H | The controls identified in the whole academy slips/trips/falls risk assessment will be adhered too | | <i>Append copy of risk assessment to this document</i> | | | |
| Use of Mobile Phones | M | Use of mobile phones will be kept to minimum using landlines where possible. Hands free kits will be made available to key staff | | | | | |
| | | Use of mobile phones whilst driving is not permitted | | | | | |
| Electrical Equipment | H | Equipment is checked before use for defects | | | | | |
| | | All electrical equipment is PAT tested | | | | | |
| | | Sockets are not overloaded and cable management devices are provided | | | | | |

| | | | | | |
|---|--|--|--|---|--|
| DSE/Fatigue | H | Staff on duty are advised to take regular breaks. DSE guidance is appended to this document | | <i>Append copy DSE guidance to this document</i> | |
| Security (people and information) | M | Suitable access control facilities are in place always and the room is locked when not occupied. Sensitive information is held securely at all times | | | |
| Evacuation | H | If the site is considered unsafe an alternative command centre off site is available | | | |
| Risk Rating Guidance: H= High M= Medium L= Low TBA = To Be Assessed - Assessment of the likelihood and or impact of injury and or damage. Initial assessment has been undertaken, complete the residual assessment based on your control measures/findings/additional actions etc. | | | | | |
| Other Hazards Identified | Additional Control Measures to be Put in Place | | | | |
| Any other foreseeable hazards that are associated with the activities being carried out to be listed here. | Where you have identified, other hazards record the additional control measures you are going to put in place to mitigate these below: | | | | |
| Date of Assessment: | | Carried out by: | | Signature: | |
| Date of next review: | | Carried out by: | | Date Review Completed: | |
| Also, refer to these other relevant risk assessments or safety advice documents: | <ul style="list-style-type: none"> • Premises & Facilities Manual • Critical Incident & Business Continuity Toolkit & Plans/Policies • Safety Guidance Document SG12 Working Alone, SG7 Manual Handling, SG4 DSE • Whole academy slips/trips/falls risk assessment | | | | |

8. APPENDIX C Influenza Pandemic General Guidance

General guidance in the event that The World Health Organisation (WHO) declares a pandemic situation.

- If the WHO decides to declare a pandemic, this will be based on what is happening globally because of the geographic spread of a virus, rather than its severity, and does not suggest a sudden shift in the UK situation.
- The UK government is well prepared to manage a pandemic, and will provide specific advice via the Department of Health.
- WHO will consider the overall severity of the pandemic as low, moderate or high and will issue guidance accordingly. WHO guidance will be interpreted by the Department for Health and relevant advice will be widely publicised.
- Our academy will undertake prudent planning to minimise disruption and ensure staff, students and parents are informed of decisions to be taken and the reasons for such decisions based on guidance from the Department for Health.

As part of our general arrangements the following information is provided:

Information for employees when a pandemic flu situation has been declared -

Providing you do not feel unwell you should attend work as normal, if you need to care for someone in your household who has pandemic flu then you should contact your line manager to discuss your individual situation and the options available to you.

If you develop the symptoms associated with the pandemic flu, usually fever (38 degrees Celsius or above), joint pains, severe headache, swollen glands, shortness of breath, **do not** come to work. You must telephone your line manager to let them know and seek medical advice by ringing your GP surgery or NHS direct on 0845 4647. **Do not go to your GP surgery or to Accident and Emergency** unless you are advised to do so or are seriously ill.

What you can do to protect yourself and others against pandemic flu.

The best thing you can do to protect yourself is to prevent the spread of the virus by following good hygiene practices. These will help to slow the spread of the virus and will be the single most effective thing you can do to protect yourself and others from infection.

Wash your hands:

- After using the toilet
- Before and after direct contact with others
- After arriving at work
- Before eating and drinking
- After arriving home from work.

If you cough or sneeze it is especially important to follow the rules of good hygiene to prevent the spread of germs:

Always carry tissues

- Use clean tissues to cover your mouth and nose when you cough and sneeze, bin the tissue after one use
- Wash your hands with soap and water or a sanitizer gel often.

Information for Principal/line managers

What you should do in advance of a pandemic

- As Principal or manager, you should check suitable planning and preparation to minimise the effect of an influenza pandemic, decisions regarding part or full closure and how this will be communicated to staff, parents and children.

Preparing emergency continuity plans before a pandemic

- Ensure communications systems are efficient and details are up to date, a system of contact for all parents is in place including parents where English is a second language e.g.
 - texting messages
 - emailing messages
 - local radio stations
 - other suitable routes.
- Make clear the arrangements for supporting those who need time off to care for dependents;
- Clarify procedures to follow for staff who have medical conditions that may place them in high risk groups;
- If the Principal/manager post is vacant, or the head and deputy/other leadership team members are ill, ensure decisions have been made in advance in respect of cover arrangements;
- Are supply cover procedures in place, a bank of staff who can be called upon and or how internal reorganisation arrangements will be undertaken to ensure the academy remains open?
- Ensure backup arrangements for premises officers/ key holders are in place, bearing in mind requirements of insurance cover and health and safety risk assessments;
- Confirm the arrangements for ensuring buildings are safe and suitably heated if premises staff are ill;
- Maintain health and safety and hygiene arrangements to a high standard e.g. regular cleaning toilets, door handles, hand rails etc and prompt disposal of waste, to minimise spread;
- What provision is in place for rapid access to medical help if needed?
- Check willingness of staff to take on a different role for the duration of the pandemic, taking account of staff and unions' views and draw up a list of who is able and willing to do what other duties;
- Assess desirability/practicality of sharing staff between Academies;
- Evaluate options for unqualified adults/parent volunteers to assist qualified staff during high staff absences; (note: subject to any relevant DBS checks, so you may need to include this in your planning);
- Ensure health & safety inductions, additional risk assessments etc are completed where staff are unfamiliar to the academy and or the tasks to be performed;
- Clarify role of staff during closure i.e. attend work and be available to work elsewhere (e.g. undertake skills audit to assist placement of staff in suitable positions)

Preparing to re-open Academy after a closure period

1. Ensure you have enough teaching staff available to return to work to satisfy supervision ratios
2. Ensure the building has undergone a deep clean and is suitable for occupation
3. Plan what staff are going to cover what duties until staffing returns to 100%
4. Prepare briefings for staff pre re-opening on expectations
5. Advise staff who are pregnant or have low immune systems to seek advice from their GP before returning to work.

Template Model Business Continuity Pandemic Influenza Plan for Academies

Date Plan Agreed:

Plan Due for Review:

(This plan is an appendix document to our whole academy business continuity plan)

Academy Plan for Dealing with Pandemic Influenza

Introduction

This document sets out the approach we will take for our academy during a flu pandemic. The plan will ensure wherever practical the continuity of the academy's key functions during a pandemic. It forms part of our academy and trust wide continuity arrangements. The plan is not exhaustive or rigid in format and is intended to assist in supporting our academy critical incident and business continuity planning procedures and documentation.

Plan Objectives

The plan will help the academy to;

Maintain the provision of education and other services to students as far as are reasonably practical during a pandemic situation to:

- maximise attendance of students and their educational achievement
- ensure the health and safety of pupils and staff

this will be achieved by:

- Identifying resources and alternative ways of working to ensure the academy remains open and safe in collaboration with staff and our 'network of academies'
- Reducing the impact of an influenza pandemic through promotion of good hygiene
- Obtaining the most up to date information
- Providing accurate, timely and relevant advice and information to staff, students, parents / carers
- Planning for a potential closure if instructed by the Health Protection Agency or due to a staff shortage

Pandemic Influenza Overview

"Pandemic flu is different from ordinary flu, it's a new virus that appears in humans and spreads very quickly from person to person worldwide. People do not have immunity to it and everyone could be at risk of catching it. This includes healthy adults as well as older people, young children and those with existing medical conditions." (*Government Advice*).

Scientists predict that pandemics will happen, but cannot say when that might be and what the impact would be. It will depend on how quickly the virus spreads, which age groups are affected most, the severity of the symptoms and at the very worst, how many deaths it causes.

There may be more than one pandemic wave (with an interval of several months) and subsequent waves could be more severe. By the end of a pandemic, around a quarter of the population may have been affected. Therefore, it is so important for us to plan for pandemic influenza.

The Department for Education also provide advice and guidance on Planning for an Influenza Pandemic and we have incorporated appropriate elements of this guidance within our plan.

Critical Features of Influenza

Our plan defines pandemic flu type symptoms as -

- sudden onset of fever /very high temperature
- persistent cough or shortness of breath
- Severe headache and or nausea
- aching muscles
- constant sneezing
- loss of appetite

Staff should familiarise themselves with these symptoms and be extra vigilant during a flu pandemic, however symptoms may vary depending on the specific strain of influenza.

Impact & Actions

The World Health Organisation (WHO) has produced a global preparedness plan with 6 levels – the level at 6 being the stage where there is efficient and sustained human to human transmission. At level 6, the UK will use its own alert scale, our academy will adopt this alert scale;

| | | |
|-----------------|-----------|--|
| UK Alert | Level 1 - | cases only outside UK |
| | Level 2 - | new virus isolated in UK (over 250 miles away) |
| | Level 3 - | outbreaks in the UK (under 250 miles away) |
| | Level 4 - | widespread activity across the UK |

During a flu pandemic, the impact on the academy will vary dependant on the alert level and local outbreaks, we will invoke our plans at **level 3** and above.

A small-scale impact could be that there are no confirmed pupil or staff cases in our academy with just the odd isolated case in the wider area.

Large scale impact could be academy closure due to significant staff shortages or when advised by the Health Protection Agency (HPA), to minimise further widespread infection.

Closing the academy will have a significant impact upon the education, well-being, health and safety of our students as well as upon the business continuity and the maintenance of essential services in the wider community and will not be a decision we take lightly. Our aim therefore is to provide business as usual unless we receive guidance from Health Protection Agency that the academy will need to close for health reasons or the safety of staff and students is compromised due to high illness rates amongst our staff.

Early Planning

This plan forms part of our overall continuity arrangements. As part of our planning arrangements, we have identified our core functions (whether critical or desirable) and the resources required delivering them, in addition we have an up-to-date emergency contact list for staff and students and our plan is periodically tested. We will deploy resources available to keeping children safe in academy as our staffing members reduce but we will endeavour to maintain as much teaching and learning as we can either in the academy or remotely.

During a pandemic, we will also:

- Read the guidance available to us and share it with staff and AIC members.
- Seek advice from other appropriate agencies and the wider community as necessary.

The following members of staff, (in consultation with the Health Protection Authority, the Academy Trust Board and Governing Body) are empowered to decide on the closure and re-opening of the academy:

- Name: _____ or in his/her absence;
- Name: _____ or in his/her absence;
- Name: _____

UK Alert Level 2 –

At this stage, we will:

- Establish an Academy Continuity Action Team that will manage the impact of the pandemic.

The Academy Team Coordinator – who will lead the Team is

The Academy Team Liaison Officer – who will be responsible for liaising with, gathering and sharing information made available by the DfE, Health Protection Agency, NHS and the local authority (and other sources as appropriate) is

At this stage our academy will –

- Remain open and provide business as usual
- Follow any advice provided by the DfE and Health Protection Agency
- Ensure emergency contact details for students and staff are up to date and the most appropriate means of contact are in place (e.g. email, phone, text, letter), taking into consideration any communications barriers, such as languages
- Raise awareness amongst staff and parents and advise on minimising spread of the virus
- Ensure that all vulnerable pupils and staff who meet the criteria for vulnerability have been identified and have individual care plans (See Appendix 1 – Pandemic Plan)
- Ensure other key contact details are up to date
- Ensure key staff have access to our continuity plans and contact details
- Check cleaning and hot water arrangements and review stocks of soap, towels, tissues, cleaning equipment, bin bags and other supplies that may be required if the situation escalates
- Prepare materials in case remote learning becomes necessary
- Compile a list of available supply cover and volunteers (with relevant DBS checks) who could be called upon in times of significant staff absence
- Coordinate with our local 'network of academies to identify where mutual support and assistance could be provided.

UK Alert Level 3 –

At this stage, we will:

- Provide business as usual as far as possible
- Follow any advice provided by the DfE and Health Protection Agency
- Ensure Government advice on hygiene is followed rigorously in academy
- Increase cleaning regimes (including daytime cleaning of toilets, door handles/handrails etc)
- Advise parents and carers that during normal academy times:
 - Children should come to academy unless they have any symptoms, non-attendance will be followed up in the usual manner
 - To phone NHS Direct or their GP if their child develops symptoms either at home or at academy
 - They may need to take children home at short notice if they develop flu like symptoms
- Contact parents/carers if a child develops flu like symptoms whilst at academy and decide for the child to be looked after until they can be taken home safely as soon as possible
- Identify a location within the academy for the separation of children that become sick whilst at academy
- Continue to review contact details for staff, pupils, parents/carers
- Review continuity and closure procedures
- Ensure staff have prepared education material for remote learning
- Reinforce infection control measures for students, staff and visitors to the academy
- Display infection control posters in all washrooms and around the academy
- Start an Incident Log.

UK Alert Level 4 –

At this level, widespread outbreak and staff absence will be experienced.

At this stage, we will:

- Continue with all the arrangements set out at Levels 2 and 3.
- Liaise closely with the local family of academies to maintain mutual support and maximise opportunities for keeping the academy open
- Heed advice on closure criteria from the HPA, and brief AIC members on closure criteria
- Inform parents / carers of the potential or actual academy closure (see appendix)
- Inform parents / carers about the arrangements for students continued education during a period of closure, also the likely schedule for re-opening the academy.
- Communicate with staff, student's parents / carers using the following systems and arrangements
 - a) Staff: e.g. meetings
 - b) Pupils e.g. assemblies, classroom activities
 - c) Parents / carers: e.g. letter, website
- Keep contact details for pupils, parents / carers, including email addresses in hard copy within the academy's emergency plan
- Continue education for students / remote learning as far as practical.

Media

If the academy is contacted by the media, all enquiries will be dealt with by _____ (Also refer to media section within CIP/BCP plan)

Closure Criteria

Academy will remain open unless closure is advised by the HPA, the local authority (as part of civil contingency arrangements) or if due to staff shortages suitable supervision of students cannot be provided. If overall staffing levels (including use of supply/volunteers etc) fall below xx% of normal operating levels, we will close the academy on safety grounds. If instructed by the Academy Team Coordinator, staff will be expected to organise access to learning materials for remote learning to give as much continuity to our children as possible.

Staff absence will have the greatest effect on our ability to sustain our business as usual. When faced with staff shortages we will meet the short fall in the following order -

1. Absorb internally
2. Bring in suitably qualified supply staff
3. Review the level and range of services we provide, delivering essential services only
4. Recruit help within our community from appropriate volunteers and or our Network of Academy's
5. Consider part of whole academy closure

Recovery / Re-Opening

On advice from the Health Protection Agency, we will reopen academy when we are advised it is appropriate to do so. The criteria for the re-opening of closed sites, will usually be dictated by government and will reflect when infection rates are sufficiently low.

It is possible that partial re-opening could be advised e.g. for children that have been infected and who have recovered.

The following considerations for re-opening will be made;

1. Do we have enough teaching staff available to return to work?
2. Have we prepared briefings for staff pre re-opening?
3. Have we considered impact relating to any deaths in the community and is appropriate counselling for staff and students in place?
4. Will all year groups return together or is it more appropriate to stagger the return of students?
5. Do we need to adjust the curriculum in the short term until we are back to 'business as usual'?
6. Have we chosen a suitable date and has this been communicated to staff, parent/carers, students and other appropriate stakeholders?
7. Are contracted services such as transport, catering, cleaning notified and available to resume services

Review

Once the academy has recovered, we recognise it is important that we review what went well and where improvements could be achieved, and for this to be fed back into our plans. The incident log is a crucial tool for recording actions, decisions and communications that can be examined after the event to capture lessons learned.

APPENDIX 1 Pandemic Plan

Pandemic Flu – Identification of Vulnerable Students and Staff

Definitions of vulnerable groups from the National Health Service. For each new pandemic /strain of a flu virus both symptoms and vulnerable groups may need to be redefined pending NHS advice.

- chronic (long-term) lung disease, including people who have had drug treatment for their asthma within the past three years,
- chronic heart disease,
- chronic kidney disease,
- chronic liver disease,
- chronic neurological disease (neurological disorders include motor neurone disease, Parkinson's disease and multiple sclerosis),
- suppressed immune systems (whether caused by disease or treatment),
- diabetes,
- pregnant women,
- people aged 65 or older, and
- young children under five

List of Vulnerable Pupils

| Name | Date of Birth | Vulnerability | Emergency Contact Details |
|------|---------------|---------------|---------------------------|
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List of Vulnerable Staff

| Name | Date of Birth | Vulnerability | Emergency Contact Details |
|------|---------------|---------------|---------------------------|
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APPENDIX 2 Pandemic Plan

PANDEMIC CONTINUITY PLAN – CRITICAL AND DESIRABLE FUNCTION ANALYSIS

Function Analysis

It is important to identify and record the critical and desirable functions that would need to be supported if academy remained open during a flu pandemic in the community.

**Each academy will need to populate with its core functions (below are provided some examples)*

| Core Functions * | The minimum resources required to support Core Functions | Actions if Minimum Resource for Core Function is not Available |
|--|---|--|
| Critical – (for example) <ol style="list-style-type: none"> Teaching and learning provision Safeguarding Provision of safe and secure learning environment | <ul style="list-style-type: none"> Staff Telecommunications ICT Gas Electric Water supply | |
| Desirable – <ol style="list-style-type: none"> Full Catering Provision After/Before Academy Clubs | | |

APPENDIX 3 Pandemic Plan

ACADEMY INCIDENT LOG SHEET

INCIDENT LOG SHEETS TO BE COMPLETED BY APPROPRIATE STAFF AT LEVEL 3 STAGE AND ABOVE COMPLETED INCIDENT LOG SHEETS WILL: -

- Assist in maintaining a true picture of the unfolding events
- Assist in providing information for any inquiry which may follow an emergency response
- Help with improving the response of the academy in the future

YOUR NAME _____

YOUR JOB TITLE _____

| DATE | TIME | MESSAGE/INFORMATION FROM/TO (Name, Position Organisation) | MESSAGE DETAILS | DECISION/RESPONSE/ACTION REQUIRED |
|------|------|---|-----------------|-----------------------------------|
| | | | | |

PAGE _____ OF _____