



RGS SURREY HILLS

Business Interruption and Incident Management Plan

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I. Introduction

This policy aims to set out some examples of major incidents that the School could face and provide a framework as to how the School should respond. It is not possible to identify all potential scenarios the School could face nor to be specific or directive on how to respond. The aim is to identify key aspects and principles of any incident response and then look at some specific examples for more detailed guidance.

In all scenarios the priority is always the health, safety and welfare of pupils, staff and the wider community. Beyond this the objective of the response to any incident must be to minimize any interruption to the School's educational delivery, protect the interests of the School as a charity and a business and ensure appropriate and high quality communication with key stakeholders.

This policy will identify a response framework that is likely to be relevant to all major incidents and then provide relevant specific guidance for the following types of incident:

- I. Major welfare issue impacting the School community for example the **death of a pupil**.
- II. A **physical disaster** impacting one or more boarding house(s) and requiring **evacuation** for at least one night.
- III. A **physical disaster** impacting a key, non-boarding, building such as a **classroom, the kitchen or office space**.
- IV. A major **incident** during a **trip, expedition or educational visit**.
- V. A **Data Breach** including accidental breaches by the School as well as ransomware and other Cyber-attacks by criminal actors.
- VI. An **IT Shut Down**.
- VII. A new **Pandemic** or a recurrence of Covid (e.g. A new variant).
- VIII. A **physical attack** on the School premises requiring an emergency "lock down" of staff and pupils for example an **armed intruder**.

2. Response Framework for all major incidents and business interruptions

The following responses/actions are highly likely to be common to all incidents:

Headmistress to be informed as the immediate escalation point if not already aware.

Once appraised of the situation, the Headmistress will form an Incident Response Team (IRT) Chaired by the Headmistress. The make-up of this team will vary depending on the incident and availability of key staff (some may have been affected by the incident in which case the team should be formed in a logical way based on who is present), but will almost certainly draw from the following:

Role	Rationale for Inclusion on IRT
Deputy Head Pastoral, Deputy Head Academic	Key senior leaders providing link to the pupils and pastoral and academic leaders
Group marketing manager/ Headmistress	Communications and external relations
Director of Boarding	Key operational link to the boarding community
Director of Operations	Liaison with operational staff resource

Head of IT	Management of IT impacts
HR Manager	Management of staff impacts
Headmistress's Executive Assistant	Note taking and recording of major decisions and actions

In practical terms there will be flexibility as to how this team will meet and communicate with each other. It is likely a WhatsApp group or similar will be created immediately to allow for real time and mobile communications. Initial meetings may be held in person or remotely by video conference (Zoom/Teams etc.). A dedicated Teams site may be set up by the Head of IT to allow for online sharing of information, action lists and key documents.

Issues to be immediately considered and discussed by the IRT

- **Pupil and staff welfare**

The IRT will need to assess quickly whether there are any immediate or ongoing threats to the health and safety of the School community, if there are then they should consider what steps can be, or have been, taken to protect all those at risk.

The IRT will need to immediately consider the status of pupils on site, the need to safely and quickly send day pupils home will need to be discussed as well as how to manage the pupils pending their departure.

Depending on the nature of the incident the boarding evacuation plan may need to be, or already have been, activated. This is outlined in appendix I.

If the emergency services are involved (or need to be) a single liaison should be identified at this point (this will likely be either the Headmistress or Director of Operations depending on the nature and impact of the incident).

- **Mitigation options**

Depending on the nature of the incident and its extent at the time of the first discussions it is important for the IRT to discuss what, if any, actions or decisions can be discussed to mitigate or reduce the impact of the incident. The nature of these discussions cannot be stipulated here as they are incident specific but it is important that the IRT is action focused and looks to solve the issue and/or reduce the impact where practical.

- **Communications**

At all stages of the Incident Response process the issue of communication should be considered carefully. This will be managed by the Head and the group Marketing Manager.

Consideration must be given to the School Community (pupils, staff, parents, Governors) in the context of an assessment of what is known, what should be known, what misinformation may be in the community and how can information gaps best be filled. This assessment will almost certainly vary from the first hour to the

tenth hour and from day one to day five and so on. Given the complexity here it is critical that communication is discussed regularly and seen as a key output of the IRT.

It is important that very early on in the incident the Head establishes direct communication with the Board of Governors. This is likely to be via the Chair of the board of governors and in some circumstances, depending on the seriousness of the incident the Chair of the board may form part of the IRT.

Depending on the nature of the incident the IRT may consider an approach whereby information is cascaded via telephone using, for example, the line management structure and/or Heads of Years, House Parents or other appropriate hierarchy. This can lead to rapid and personalized communication which will help to ensure that key people are kept informed and the information flow is controlled.

Other Key communications to consider in the early stages of a major incident would be as follows:

- The Schools' insurers to notify them of the incident and any possible claim by or against the School (communication by the Director of Operations)
- The Schools' legal advisors (communication by the Group Bursar)
- The Schools' public relations consultants (communication by Group Marketing manager)

- **IRT Process**

Once the above points have been addressed there should be a broad understanding of the nature of the incident the School faces and the likely timeframe of the "crisis". At this point the IRT should discuss and confirm how it will operate for the duration of the incident:

- **Key points of liaison;** (These will be situation dependent for example Director of Marketing and Admissions for media liaison, Chief Operating Officer for legal and insurance, Headmistress for communication with external agencies)
- **Regularity of IRT meetings;** this might be hourly, daily or weekly depending on the situation, the timing of meetings may change as the situation unfolds and meetings are likely to be more regular in the initial phases. At the outset of an incident the IRT may stay together in a "war room" scenario as all aspects of the crisis are assessed and dealt with.
- **Format of meetings;** It is important that the IRT agree the optimum way to hold meetings, this may be face to face or via Zoom/Teams depending on the incident and may be a combination of different forms of meeting.
- **IRT members wellbeing;** This must be considered firstly to ensure that the stress and emotional strain of managing an incident is considered and to ensure that the IRT is supported appropriately to ensure it functions effectively in what will, be an acutely stressful and possibly unprecedented situation. The IRT should establish mechanisms for mutual support and consider involving the board of governors in this aspect to ensure top level support.

3. Major welfare issue impacting the School community for example the death of a pupil or staff member:

This scenario does not lead to any physical impact on the School's premises nor, in principle, to the School's ability to deliver education and/accommodate its' pupils. That said any kind of incident affecting the welfare of one or more pupils or staff needs careful consideration and the formation of an IRT.

In the situation of the death of a pupil or staff member either by accident, suicide or foul play the IRT must (in addition to the actions identified in section 2) quickly assess the situation and consider the following:

- **The protection of the mental and physical health of the community.** This may require immediate counselling facilities being provided by the School to pupils and/or staff as well as ongoing support once the initial, acute period of trauma has passed.
- In the situation where a pupil has taken their own life the IRT must consider the need for immediate **pastoral interventions** to ensure there is no "contagion" and assess the risk that other children were aware of the intention to act and may be considering the same.
- Whether it is appropriate for the School to stay open in the immediate aftermath of the incident. It is possible that as a mark of respect and/or to allow pupils and staff time to process their emotions **the School may need to close for a period of time.** The IRT may consider that this decision should be focused on a specific cohort of pupils or staff who have been more directly impacted by the event.
- If a fatality has occurred in a boarding house whether the **boarders' evacuation protocol** (appendix 1) needs to be activated for that house and/or the wider boarding community.
- **Communication with stakeholders.** In this scenario communication is likely to be exceptionally sensitive, difficult to pitch and subject to scrutiny, it will therefore require significant thought and external support through a PR consultant

In this scenario there is every likelihood that many if not all of the members of the IRT will be significantly emotionally impacted by the incident and therefore the IRT must assess its own wellbeing and ensure that it establishes necessary support structures to enable it to function. This scenario is therefore one that may require more extensive Governor support to provide decision making at a degree of emotional distance.

4. A physical disaster impacting one or more boarding house(s) and requiring evacuation for at least one night

In this scenario the reference to a "disaster" would indicate something catastrophic that risks not only the physical fabric of the boarding house but also the safety of the boarders and the relevant staff, for example a fire or explosion (e.g. after a gas leak). Conversely a boarding house could require temporary closure for something less immediately dangerous for example an insect infestation, a flood or damp.

In the case of an immediately dangerous physical event such as a fire then the staff and pupils would follow the School's usual evacuation procedures which are regularly drilled in line with the regulations. Should injury or a fatality occur then section 3 of this document becomes relevant. When all staff and pupils are safe/accounted for then the IRT would need to quickly assess the extent of the damage and the implications for the boarding house and the School more broadly.

In the event of a fire or explosion that significantly affects the structure and appearance of a building it is highly likely that the boarders' evacuation protocol will need to be activated (appendix I). The IRT will need to consider the possibility that boarders will need alternative accommodation for a sustained period whilst repairs are undertaken.

If a boarding house is subject to significant damage it is important that the safety of the wider community is considered and communications are clear for pupils and staff as to which areas are out of bounds, there should be clear signage to this effect in place as soon as is practical.

5. A physical disaster impacting a key, non-boarding, building such as a classroom, the kitchen or office space:

In this scenario several the actions from section 4 are relevant and should be considered by the IRT. This section addresses specific additional actions that may be relevant depending on the nature of the building impacted.

I. Damage to a classroom or classrooms

The nature of the School's facilities are such that any damage to buildings is likely to be contained to specific areas. In this scenario the worst case scenario is that a cluster of classrooms are impacted, for example physical damage to the MFL block or the Quad could impact several classrooms but would be unlikely to affect the rest of the buildings. Even in the worst case scenario it is highly likely that more classrooms will be operable than not.

In this situation, once it is established that all staff and pupils are accounted for and/or safe, the IRT must assess the number of classrooms impacted and the implications for the continuity of education. Should one or more classrooms be out of action for a sustained period the IRT will consider what, if any, modifications may be necessary to allow continuity of education this may include, but will not be limited to, the following:

- A short term revised timetable
- A revised/shortened/lengthened School day to accommodate the revised timetable
- A rotational School closure with certain year groups in School on set days in rotation with year groups learning remotely
- A prioritized timetable with face to face learning available for exam cohorts and online learning for other year groups
- A temporary move to a completely online offering whilst the affected classrooms are made safe and usable
- An assessment of the feasibility of constructing temporary classrooms whilst existing buildings are repaired

II. Damage to the main kitchen facilities

The School outsources its catering provision to a third party but retains ownership of the kitchen and the equipment therein. Therefore any damage that impacts the kitchen (and the dining area) will be dealt with in conjunction with the catering company.

Any incident which prevents food being prepared and served safely and hygienically is a significant issue for the School. All pupils eat lunch in the dining hall and boarders are served breakfast and dinner as well. School provided meals are the only access the boarding community has to cooked meals.

In this scenario the IRT would need to liaise closely with the catering company, indeed a member of the operational management team from the company should be a member of the IRT. An early assessment of the nature, extent and likely timeframe of the impact should be made to allow for a consideration of the relevance of the following, possible, methods of mitigating the situation:

- Packed lunches could be provided by the catering company for the lunchtime provision. This is unlikely to be well received by parents or pupils but for a clearly defined period, if well communicated, would be appropriate in the short term.
- For a more sustained period and for boarders breakfast and dinners discussions with the catering company should consider the viability of food being prepared offsite and transported in for mealtimes. This would be logistically challenging but would be viable for a short period.
- Discussions with the catering company should also include an assessment of alternative cooking facilities in the School and the extent to which these could provide a temporary solution. This should include existing (each boarding house has a domestic kitchen) and potential (a temporary kitchen being established whilst the main facility is repaired) facilities.
- If the IRT do not feel confident that the School can safely and hygienically feed its pupils, especially boarders, then it must consider School closure and/or activating the boarders' evacuation protocol.

III. Damage to office facilities

The severity and impact of this type of incident will depend on the nature of the office facilities affected. Once again the nature of the School site is such that offices are widely dispersed and so it is unlikely that all office space would be impacted at the same time.

In this scenario the IRT must consider moving staff to remote working, this would need to be considered carefully if the remainder of the School was fully operational to ensure that those staff who need to be onsite to perform their key functions are able to access a desk.

All staff now have access to laptops so hot desking is a workable solution and the IRT should consider which staff to prioritise coming on site and whether a rotational system is appropriate with certain staff working at home on certain days of the week. These assessments would be dependent on the specific areas impacted and the type of staff directly affected.

6. An incident during a trip, sports fixture, expedition or educational visit

All trips where staff and pupils are offsite for a period of time are subject to detailed risk assessments, these should mitigate the risks associated with the activities undertaken. The risk assessment will designate a senior point of liaison at the School who should be made aware of an incident in the first instance.

The senior contact at School should communicate with senior colleagues and form the IRT as necessary. The nature of the actions undertaken by the IRT will depend on the nature of the incident, key issues to address will likely include;

- Ensuring that there are clear lines of communication between the leader on the trip and the IRT. IRT meetings will almost certainly need to include the trip leader.
- Communication, when appropriate, with parents of children on the trip, with pupils universally having mobile phones it is likely that the parent body will be aware of the incident however it is important that the School makes clear the facts and issues unambiguous official statements.
- Where the trip is overseas the IRT must consider ways to provide support to the trip leader, this may involve contacting the relevant British Embassy or Consulate, arranging translation services or speaking directly with agencies local to the trip.
- Whether the IRT should send one or more senior staff from the School to the location of the trip to assist with managing the incident and its aftermath. This will be situation dependent and likely to only be in extreme circumstances.
- If the incident hasn't affected all of the pupils on the trip there must be a decision as to whether the other pupils should return home early and how this can be logistically managed.
- Whether the IRT should establish a physical area where parents can base themselves to await and receive news in real time. The dining room or McComish Hall would be logical places to allow parents to gather.

7. Data Breach including accidental breaches by the School as well as ransomware and other Cyberattacks by criminal actors

The School covers the response to a specific incident of this nature in a separate document as part of its IT policies and procedures.

8. IT Shut Down

The IT department has a separate document detailing the appropriate response to an IT shut down.

9. A new Pandemic or a recurrence of Covid (new variant) requiring a response

The unfortunate experience of the Covid pandemic means that the school is relatively well equipped to respond appropriately to a new pandemic. The response would depend on the relative transmissibility of the disease as well as the severity of the health impacts.

At all stages of a pandemic the School must follow government guidelines, where guidelines don't exist or are ambiguous the School should err on the side of caution and prioritise the health of the community over other considerations.

Should the school decide, or be instructed by government, to close then academic delivery should revert to a fully online model. All teaching staff have laptops with appropriate software to allow this to happen relatively seamlessly.

In the event of a School closure a version of the Boarders Evacuation Protocol should be activated to ensure that boarders can safely be accommodated offsite. This will need careful planning and consideration especially if there are travel restrictions due to the public health situation.

In the event of a serious outbreak of a highly contagious and harmful disease on the School site the IRT should immediately and safely form (likely to be through an online meeting). The Lead Nurse should be a member of the IRT and be the key liaison with public health authorities.

In this scenario all of the general considerations outlined in section 2 will be relevant with additional consideration of ways to limit the spread of the disease and whether the School should physically close and for how long.

10. A physical attack on the School premises requiring an emergency “lock down” of staff and pupils for example an armed intruder:

An incident of this nature would be highly impactful on the School and its wider community with associated media coverage and reputational impacts.

In all likelihood the role of the IRT would be to deal with the aftermath of the incident as the event itself would be relatively short-lived and any protracted crisis (hostage taking for example) would be managed by the school critical incident team and the emergency services.

The School does need to be prepared with immediate reactions should it become apparent that an incident is unfolding. The following procedure is used in the school:

- A siren will be sounded across the campus and an alert will be broadcast on all staff devices.
- The Critical incident management will communicate on the dedicated teams channel and staff will monitor the general staff channel for updates.
- Pupils will remain in or move to the classroom of their next lesson. Staff will secure the classrooms and ensure pupils remain out of sight.
- The SLT member on duty will coordinate the critical incident response and ensure appropriate communication to the emergency services as well as parents and the wider community is actioned.

This procedure has been practiced as a drill and communication channels tested.

In the aftermath of the incident the IRT should focus on the wellbeing of pupils and staff who may well be traumatized. Further the IRT should ensure communication with key stakeholders is well managed and that media statements from the School are appropriate and have been agreed with the PR consultants.

Appendix I Boarders Evacuation Protocol

This appendix sets out the actions to take in the event that boarders need to be accommodated outside of their boarding house for at least one night due to a major incident (including but not limited to) fire, flood, power failure, staffing issues).

Given the physical profile of the School's boarding facilities it is probable that an incident will impact boarding houses individually but an incident impacting two or more is not impossible and so this protocol is relevant to when both one, six or some number of houses in between is impacted.

Key Actions:

- The Deputy Head Pastoral, Director of Boarding and relevant Houseparent(s) must agree the need to evacuate and confirm the decision with the IRT. Note that in urgent, out of hours scenarios this decision may be taken by a smaller number of the individuals involved.
- The first priority will be the Health and Safety of the boarders so any evacuation must be executed appropriately for the circumstances. If it is safe to do so and there is time to collect belongings the this should be allowed for and appropriately supervised, this is likely to be managed by the Houseparent(s).
- Once out of the boarding house boarders should be placed somewhere safe, warm and supervised and offered whatever is necessary and possible for their safety and comfort.
- The situation should be assessed and accommodation options considered and acted upon by the IRT. For example:
 - If the incident relates to one boarding house the number of spare beds elsewhere on campus should be assessed and decisions taken as to whether they can appropriately be used by some or all of the displaced boarders.
 - If no alternative beds are available Individual plans should be made for domestic boarders, at this point parents should be telephoned and asked to collect their child were practical.
 - For overseas boarders Guardians should be contacted at this point and asked to collect the boarders for whom they are responsible.
 - It is likely that after this process is complete that all of the boarders will have somewhere to stay, for any where there is no short-term accommodation available the School must consider options and assess the risks of alternative accommodation. This will include local hotels or establishing a temporary dormitory in the School Sports Hall.
- Once housed it is important that there is regular communication with the boarders, their families and guardians to keep all involved up to date as to the situation and how and when the boarders can safely return to School. The IRT should, after all children are safely relocated agree a short and medium term communication plan to ensure that there is no confusion and all stakeholders are aware of the situation.