

BUSINESS CONTINUITY PLAN & STUDENT PROTECTION PLAN

1. AIM

The aim of this section is to lay down the procedures to deal with **Business Continuity Plan (BCP)** and its adverse effects coming in the way of students, due to circumstances beyond the control of the Institutional Management. Also, to lay down the AGE strategies, do its risk assessment in case of numerous risk factors affecting AGE Institution.

2. INTRODUCTION

Every organization has its strategic plans, which are susceptible to serious causes of business interruption. Business continuity planning aims to anticipate this threat to our plans, and ensure the maintenance of critical operations when an organization is confronted with interruptions such as natural disasters, technology failures or threats, human errors, terrorism, or maintenance failures. By developing a business continuity plan, an organization is able to minimize losses during times of business interruptions, while continuing to serve customers and maintain administrative operations. It is a tool to assist in preparing for "disasters" that could leave resources such as personnel, records, information, infrastructure and physical facilities unavailable for both short term or extended periods. AGE has developed a BCP and established a structure to administer the plan, update, and implement the plan if required. The intent is to minimize the amount of disruption any future emergency may cause to the Institute's critical functions.

3. AGE STRATEGIC PLAN

In line with AGE Vision, the AGE Strategic Plan hinges on the aspiration to be the foremost leading global provider of accredited, industry relevant qualifications which are flexible, accessible and affordable to the masses. The objective is to provide access to quality higher education for people across the globe and to contribute towards their talent development and empowerment.

3.1 AGE Strategies

- Ensure that students have the best experience in a learning and friendly atmosphere.
- Continue to cultivate the best quality in teaching and learning through the promotion of original and inventive approaches that support critical thinking.
- Optimize the efficiency of our processes and systems through available state of art technology systems, which should include highly innovative classrooms and teaching pedagogy methods, excellent learning management and customer relationship management systems.
- Recruit the best talent available as faculties, administrators and other staff members required for an institute.
- Align AGE with the best international practices in learning and education.
- Contribute towards making a better society through philanthropic contributions and corporate social responsibility initiatives in the region.
- Establish a blended learning model system with the best training aids to carry out experiential learning activities in all our conducted classes.
- Expand our student recruitment into new international markets to provide a sustainable and low-cost model to maximum learners who desire to progress in their academic qualifications.
- Provide in our admissions processes, equality of opportunity for all applicants, and to improve efficiency and quality of service.
- Ensure that teaching and assessment at AGE provide an equal opportunity for all students to achieve and demonstrate their full academic potential.
- Supporting student wellbeing will be at the heart of our approach to providing the greatest opportunity for all our students to excel, as well as provide the welfare support that our students need to flourish.

- Ensure that we respond to today's opportunities and tomorrow's challenges, as well as prepare ourselves for any eventualities that may arise in future.
- We will be always committed to innovation and excellence in teaching, and will seek improved ways of demonstrating this in our academic staff recognition and reward processes.
- We will ensure that teaching is delivered at a high-quality level, with an inclusive approach to learning and the opportunities for innovation by using latest technology advancements.
- We will continue to develop new and innovative courses assessing the future demands in different fields of study, including employability, to ensure that our portfolios reflect advances in knowledge and meets the needs of today and tomorrow's students.
- If any adverse contingency occurs in our current location in UAE, we will identify a resource centre in India in 2021, from where we can operate independently and easily shift all our students to the new centre, in case the current centre in UAE has major disruptions and we have to close down operations. In 2022 we intend having another resource centre in UK, and by 2023 we propose to have an additional resource centre in Europe. This will ensure that normal operations can be restored with minimal disruption.

3.2 Recovery Strategy

When developing a plan for minimizing disruptions to our organization, preparing for contingencies and expediting recovery, we need to develop a comprehensive strategy for the process. A Business Continuity Plan (BCP) is developed to plan for and describe how it will respond to and recover from disruptions, so that if our plans are compromised, then we have alternatives to mitigate these disruptions. These disruptions can be localized threats (e.g., earthquakes, fires, floods, bombs, etc.) or global threats (e.g., Flu Pandemic). There can also be threats from government change in policies, low students' recruitment, closure of institutes due to circumstance beyond control, and many other such adverse exigencies. This plan is about maintaining, resuming, and recovering the AGE activities as an educational institution. It considers human factors along with operational issues.

4. COMMON COMPONENTS OF THE BUSINESS CONTINUITY PLAN

BCPs share the following four key components:

- **Business Impact Analysis.** This component identifies the institution's critical processes, provides estimates of the maximum threshold for downtime, and prioritizes essential business processes and functions for the restoration process.
- **Risk Assessment.** This second element recognizes specific threats to the institution, evaluates vulnerability to each threat, and assigns a "degree of risk" associated with each potential event or hazard.
- **Risk Management/Continuity Planning.** This component examines the results of the Risk Assessment to decide which risks require specific management and provides a written, widely distributed plan outlining the actions necessary to restore business functions in the occurrence of a disruption.
- **Testing, Training, and Updating.** The final component establishes the methodology used by the institution to consistently train staff members, test and update the plan, and communicate plan changes to employees. At AGE, critical business processes may be placed into one of three categories:
 - **Safety and Security.** This category includes activities which are necessary to maintain a safe and secure environment for all students, faculty, staff, campus visitors, and the surrounding community.
 - **Business Support Services.** These services include activities that allow the institution to maintain vital business operations, safeguard assets, and secure the financial viability of the institution. Examples of business support services include payroll, revenue collection, accounts payable, and financial reporting.

- **Learning, Education, and Research.** This category consists of all programmes and services that directly support the academic mission of the institution. Examples include student services such as admissions and registration, academic courses, research programmes, and graduation services.

5. RISK ASSESSMENT

Risk assessment focuses on the potential hazards and threats that could negatively impact institutions and attempts to predict the likelihood of occurrence, the severity of impact, and the institution's level of vulnerability for each disruptive event. This vulnerability analysis is the foundation of a business continuity plan, and it outlines how the institution might allocate additional time and resources towards mitigation or planning efforts for events with high likelihood of occurrence and high levels of severity.

5.1 Risk Management and Continuity Planning

During the risk management phase, the institution develops specific strategies to be enacted if a disruptive event occurs. These strategies should include:

- Steps to prevent interruptions and protect assets.
- Procedures to be followed during a disruptive event, including those from the institution's emergency management plan;
- Planned responses to the incident, such as reversion to paper-based systems or the activation of remote information technology facilities.
- Plans to resume normal business operations after the crisis has passed.

5.2 Disaster Recovery Plan

Disaster Recovery Plan is required to be made in conjunction with a business continuity plan. These plans lay out specific procedures that should be enacted after a disaster occurs. They typically include the following components:

- Identification of disaster recovery team members and their specific duties, including executive management roles.
- Notification procedures and alternate meeting site locations.
- Work-around processes to keep the function operational while damaged resources are being restored.
- A contract list of all staff and the functions they are qualified to perform.
- Identification of all internal and external vendors and each vendor's primary and alternate contacts.
- Make report on the expenses, resources requirements, activities, etc.

Note: The template for filling up the risk assessment matrix and risk assessment table for BCP is given at Appendices A and B.

6. IN CASE OF INSTITUTE CLOSURE AND TEACH OUT

It will be ensured that in the case of any eventuality resulting to partial/ full closure of the Institute, students' interests will be protected, so that they don't suffer if such an adverse eventuality occurs.

The following procedure will be observed in such circumstances:

- Within the notice period available with the Institute, students will be informed of the same and also told of the process they will have to follow to protect their future academic interests.
- Respective University or awarding body will also be informed of the same and also told about the process the Institute will follow to protect students' interests due to these adverse circumstances.

- Firstly, present continuing modules will be completed, students will be assessed and the final result sheet made of all current Institute students with the subjects passed by them, including the pending or failed ones.
- Secondly, AGE is part of a large Education Group, so the Group Institutions conducting similar programmes will be approached to ensure continuity of studies. The students will be able to carry forward their academic studies and will not get adversely affected in their pursuit of the academic qualifications desired by them. In case if a student does not want to continue, the **Student Protection Plan (SPP)** will ensure that refunds are made, depending on the stage of students' progress in the programme.
- Thirdly, Assessment Boards/ Board of Examiners will be organized and at the appropriate time, the relevant students' modules will be ratified by the Board to get to the final list of certificates which can be issued to students who have finished their course with AGE, the others being transferred to other Westford Institutes, which form part of the same Group as AGE.
- All applicable refunds of students will be made within 60 days of the institute closure.

7. CONTINUITY OF TEACHING

The teaching and learning strategies for validated programmes at AGE are well aligned to the aims, learning outcomes and diversity of student intake. Adequate levels of staffing are ensured to support the programme delivery. Staffing procedure will be adequate to ensure the continuity of teaching and assessment programme and thus, the institute will ensure that there is no disruption upon the departure or prolonged absence of any staff. With effective recruitment policy at AGE, both teaching and staff members are to be adequate in number and appropriately qualified for the aims and learning outcomes of the programme required to be delivered by the institute. In case of absence of any staff members, adequate arrangements will be made by the institute, so that key staff is in place and the delivery or support of the programme is not affected.

This is applied equally to the staff involved in learning support services as well as to technical and administrative support staff.

AGE firmly advocates the non-reliance on one or two staff members. The arrangements for staff deployment and development ensure continuity of the teaching programme, especially if a particular staff member is not present for the completion or delivery of the required programme.

Note: Student Protection Plan Template is attached at Appendix C.

Appendix A

RISK MATRIX: BUSINESS CONTINUITY PLAN (BCP)

		SEVERITY			
		NEGLECTIBLE Small/unimportant; not likely to have a major effect on the operation of the event / no bodily injury to requiring minor first aid injury	MARGINAL Minimal importance; has an effect on the operation of event but will not affect the event outcome / requires medical treatment	CRITICAL Serious/important; will affect the operation of the event in a negative way / suffers serious injuries or medical treatment of minors	CATASTROPHIC Maximum importance; could result in disaster/death; WILL affect the operation of the event in a negative way / death, dismemberment or serious injury to minors
PROBABILITY	LOW This risk has rarely been a problem and never occurred at a college event of this nature	LOW (1)	MEDIUM (4)	MEDIUM (6)	HIGH (10)
	MEDIUM This risk will MOST LIKELY occur at this event	LOW (2)	MEDIUM (5)	HIGH (8)	EXTREME (11)
	HIGH This risk WILL occur at this event, possibly multiple times, and has occurred in the past	MEDIUM (3)	HIGH (7)	HIGH (9)	EXTREME (12)

EXPLANATION OF RISK RANKING		
LOW	MEDIUM	If the consequences to this event/activity are LOW / MEDIUM, your group should be OK to proceed with this event/activity. It is advised that if the activity is MEDIUM, risk mitigation efforts should be made.
HIGH		If the consequences to this event/activity are HIGH, it is advised that you seek additional event planning support.
EXTREME		If the consequences to this event/activity are EXTREME, it is advised that you do not hold this event without prior consultation with Risk Management Experts

Appendix B

BCP RISK ASSESSMENT TABLE

List All Activities <i>Your activity name</i>	Associated Risk(s) <i>Risk(s) associated with the activity</i>	Severity <i>Level of impact on the trip and students</i>	Probability <i>The chances of that risk happening</i>	Risk Score <i>Risk score, found by combining impact and probability on the risk matrix</i>	Method(s) to Manage the Risk <i>A list of methods you will use to minimize the chances of the risk happening and/or the resulting damages of the risk</i>
Changing legislation and government policies	<ul style="list-style-type: none"> • Reduction in student recruitment • Staff redundancies • Reduction in Financial viability of services 	Critical	Low	Medium (6)	<ul style="list-style-type: none"> • Keeping UpToDate on new and emerging agendas • Financial stability • Staff training
Uncertain political/government agenda	<ul style="list-style-type: none"> • Constraints to long term planning 	Critical	Low	Medium (6)	<ul style="list-style-type: none"> • Keeping well informed of changing national agendas • Financial strength/reserves • Diversification activities to generate new income stream

Increasing competition from other providers	<ul style="list-style-type: none"> • Reduction of students • Reduction of income • Staff redundancies 	Critical	low	Medium (6)	<ul style="list-style-type: none"> • Competitive pricing and uniqueness in services offered • Raising colleges profile • Increasing diversifying business activities and University partnerships
Developing new business activities	<ul style="list-style-type: none"> • Lack of knowledge and skills with existing staff • Impact on existing services • Not keeping up to date with competitor activities 	Critical	medium	High (8)	<ul style="list-style-type: none"> • Development of Strategic plan • Analysis of local authority needs • Investment strategies • Identifying and responding to actual demand
Global recession	<ul style="list-style-type: none"> • Restricted borrowing • Reduced asset portfolio • Reduction in choices of suppliers 	Critical	medium	High (8)	<ul style="list-style-type: none"> • Detailed Monthly financial reviews • Budget and cash flow management • Efficient asset management • All services reviewed periodically
Expenditure exceeds income	<ul style="list-style-type: none"> • Reduced resources • Insufficient funds • Reduction in cash reserves 	Critical	Low	Medium (6)	<ul style="list-style-type: none"> • Monthly management accounts • Internal financial controls • Effective budget and cash flow management
Lack of students' recruitment	<ul style="list-style-type: none"> • Students recruitment falls below threshold level • Programme has to be closed due to inadequate recruitment 	Critical	Low	Medium (3)	<ul style="list-style-type: none"> • Staff training for student recruitment • Implementation of Business Continuity Plan
Not getting validation partnership	<ul style="list-style-type: none"> • Affect students enrolled in partner university programme 	Critical	Medium	High (6)	<ul style="list-style-type: none"> • Move students to existing running programmes • Raising colleges profile

Loss of technology and communications	<ul style="list-style-type: none"> • Loss of data • Loss of network • Loss of business continuity 	Critical	Medium	High (6)	<ul style="list-style-type: none"> • Back-up server will be put into service immediately • Replacement cycle and upgrades • Backup of data • Internet fault reporting
Failure to achieve effective workforce planning	<ul style="list-style-type: none"> • Failure to recruit and retain staff • Turnover of staff increases 	Critical	Low	Medium (6)	<ul style="list-style-type: none"> • Maintaining open channels of communication • Effective staff training and ongoing staff training • Staff induction and skill-based training

Appendix C

STUDENT PROTECTION PLAN

Provider's name: Athena Global Education (AGE)

Contact point for enquiries about this student protection plan: Mr. Mohamed Irfan; E-mail: m.irfan@athena.edu.

RISKS ASSESSMENT

- 1. An assessment of the range of risks to the continuation of study for our students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise**

Please provide an evidenced statement of your assessment of the range and level of risks to the continuation of study for our students. For example:

Athena Global Education's (AGE) Student Protection Plan ensures the protection of the college students in the unlikely event of severe events such as programme closure or change. A range of risks have been identified and assessed, and this document gives an overview of the measures AGE has put in place for mitigating or dealing with these risks.

The range of risks assessed and the likelihood that these risks will crystallise are provided here:-

- **Institution closure** – The risk to institution closure is low, the financial health is satisfactory with good forecasts for the next financial year. In this event, the measures taken for business continuity has been laid out in the Business Continuity Plan.
- **The restriction of collaborative agreements with awarding institutions/bodies** – The risk to restriction of collaborative agreements with awarding institutions/bodies is low, Athena Global Education (AGE) has excellent working arrangements with its partners and is reviewed annually and is currently stable.
- **Major changes in course content** – The risks associated with any major changes in course content is low. Athena Global Education (AGE) has a process in place to ensure that the delivery of programmes are provided as advertised.
- **Disruption of college activity** – The risk with regard to any disruptions of college activity is low. There is no previous history of events that have caused disruption to the normal operating patterns of Athena Global Education (AGE).
- **Departure of key members of college staff** – The departure of key members of Athena Global Education (AGE) staff is deemed as a low risk. Athena Global Education (AGE) does not have a high turnover rate and all staff has to serve a notice period to terminate employment and this ensures that there are no adverse effects to continuation of studies.
- **Delivery of courses at Athena Global Education (AGE) campus in the next three years** - The risk that we will no longer deliver courses at our AGE portal in the next three years will not be significant, even if we are considering the closure of this site. The

reason is that AGE is not the only entity conducting these programs, the risk in case of its closure can be mitigated as similar programmes are being conducted at our sister institutions in the Westford Education Group.

- **Delivery of short programmes in highly specialised areas in the next three years** - The risk that we are no longer able to deliver credit bearing short programmes in highly specialised areas in the next three years is moderate. These programmes have a high proportion of working students in this region.

RISKS MITIGATION

2. **The measures are in place to mitigate the risks that we consider to be reasonably likely to crystallise.**

Athena Global Education (AGE) uses a systematic process of risk management, risks and their likelihood of crystallisation are reviewed on an annual basis. For all the risks assessed in the student protection plan, measures put in place are listed below:-

- **Institution closure** – In the adverse event of AGE closure, programmes will also be delivered via alternate means such as distance learning, as Athena Global Education (AGE) is conducting all its current programs online. Since all AGE programs are online, Westford Group Institutes are also very strong on an online platform delivery model, and thus shifting students to the online portal of our sister institutions will be quite seamless. The MBA programme has been devised and developed by AGE, and similar online programmes are being conducted in Westford Education Group Institutions. It will be easy and seamless to shift all students affected by closure to Westford University College, or Eaton Business School, conducting similar programmes. For BA programmes, if the students wish to join The Open University in case of a closure, as we are conducting OU developed programme, it should be easily possible for them to migrate to the same programme.
- **The restriction of collaborative agreements with awarding institutions** – In the event that Athena Global Education (AGE) suffers restriction of collaborative agreements with awarding institutions/bodies, Athena Global Education (AGE) will work collaboratively with the lead provider to implement the student protection plan, while aiming to minimise student disruption.
- **Major changes in course content** – Athena Global Education (AGE) will make sure that changes are restricted to the minimum necessary to achieve the required quality of experience. Students and staff will be consulted with in advance of any major change to the programme. Where necessary Athena Global Education (AGE) will also allow students the opportunity to withdraw from the programme, and those students will be able to claim compensation and refund as set out below.

- **Disruption of college activity** – If Athena Global Education (AGE) undergoes a short-term suspension of programme delivery, the same can only happen due to IT failure, as all content and classes are online. Since Westford Group has its own indigenous IT Company looking after the IT infrastructure and requirements for AGE, back up servers and hardware are available with the IT Company to overcome the disruptions in very quick time.
- **Departure of key members of college staff** – Athena Global Education (AGE) will not face any major difficulties even if some key staff members leave, since the classes, support systems through LMS, content, assignments, etc. are all online. Staff turnover can be met quickly through recruitment, as well as support from Westford sister companies staff members, even if there is acute disruption.
- **Delivery of courses at Athena Global Education (AGE) campus in the next three years** – To avoid disruption and to ensure student protection, similar programmes are being conducted in sister institutions within Westford Education Group, so the transition will be very smooth.

REFUNDS

3. Information about refund of tuition fees and compensation where necessary in the event that we are no longer able to preserve continuation of study is as given below:

In the event that Athena Global Education (AGE) is no longer able to preserve continuation of study, as a first measure all elected students will be transferred to one of the WEG's other management institutes. As another subsidiary alternate, due to extreme exigencies, some of the contemporary colleges/institute present in UAE, conducting similar management courses will be communicated with and all elected students placed with the partner college/institute, though this will be the last resort due to presence of three other management colleges conducting similar programmes within the Westford Group. The refund and compensation policy will ensure that it makes provision for:-

- Refunds for students in receipt of tuitions fee loan from the banks or other financial institutions.
- Refunds for students who pay their own tuition fees.
- Refunds for students whose tuition fees are paid by a sponsor.
- The payment of additional travel costs for students affected by a change in the location of their course.

- Commitments to honour student scholarships.
- Compensation for maintenance costs and lost time where it is not possible to preserve continuation of study.
- Compensation for tuition and maintenance costs where students have to transfer courses or provider.
- Cash reserves and insurance arrangements have been put in place to ensure that all applicable refunds of students will be made within 60 working days of institute closure.
- The students will be given a choice of continuation in case of disruption with one of our sister institutes, but if the student does not want to continue and asks for a refund, the same will be given to him.
- Refunds will be made in proportion, as per the amount of academic and support services delivered to the student, keeping in mind the exit awards that he/ she will be eligible for.
- The students can apply for a refund by submitting the refund form available on the AGE portal.

COMMUNICATIONS

4. Information about how we will communicate with students about our student protection plan.

- Should the student protection plan be implemented, affected students will be contacted by a variety of methods. This will include, but not limited to; direct telephone communication, personal written correspondence, and email. Indirect communication may also be presented through the College website.
- The college will operate a minimum notice period of 20 working days to inform students in the event of course, portal or planned provider closure.
- Students will also be given the opportunity to shape the way the College mitigates risks to non-continuation, through the input at course level student affairs committee meetings.

