

CONTINUITY PLAN

Document Purpose Statement

This document sets out the Business Continuity Plan of Skills to Group, incorporating the Major Incident Plan and the Disaster Recovery Plan. The Business Continuity Plan (the Plan) is a prepared response for a range of major incidents that have a potential effect on Skills to Group's core business activities and is a significant event that impacts the delivery, loss of systems and data.

Application

The objective of this document is to co-ordinate the response of Skills to Group during a major incident and to ensure business critical functions are reinstated as soon as possible following an emergency, while full restoration of all services is planned and implemented on a concurrent basis. All staff should be aware of this policy.

Interpretation

Further guidance on the use or interpretation of this document may be obtained from the Managing Director.

Legal Requirements/Issues

Compliance with relevant Health and Safety legislation and any government mandated regulations (if national disaster or incident)

Scope

The scope of the Plan is limited to the immediate and short-term management and operational issues resulting from a major incident. The Plan does not specifically address the mid to long-term issues of reconstruction and reinstatement. The scope includes all stakeholders, staff, apprentices (learners) and sub-contractors.

The Plan particularly concentrates on responding to a major incident when such an event happens overnight, at weekends or during a holiday closure.

Should a major incident occur during routine opening hours, then the safety of apprentices (learners) and staff would be the priority, and if deemed appropriate, then evacuation would be the immediate priority via the normal evacuation procedures for each site. Once evacuation has been successfully completed, the relevant section of the Plan would become live.

Major Incident Plan

Introduction

A major incident may occur at any time and cause significant loss with prolonged interruption to the business at Skills to Group. This procedure sets out a series of responsive measures aimed at:

- Preventing or limiting the loss of life or injury.
- Minimising or limiting the damage to buildings and assets.
- Returning to full operational activities as soon as possible.

The objective of this document is to co-ordinate the response of all departments and sites within Skills to Group in the event of a major incident and to ensure business critical functions are reinstated as soon as possible, while full restoration of all services is planned and implemented on a concurrent basis.

The decision to implement the Major Incident Plan must be made by a member of the Management Group. The Plan sets out guidelines to enable the staff to respond quickly and cope effectively with an emergency situation. The Major Incident Plan may be implemented either in whole or in part depending upon the severity of the incident.

Definition

"An event or events usually sudden, which involve experiencing significant disruption to a level which potentially overwhelms normal activities and procedures, and which is likely to have related consequences both organisational and business."

A major incident is defined as an unplanned event which immediately puts part of Skills to Group's assets and activities at risk, for example a fire at the Horizon site or power outage at Lancastrian House or national lockdown due to a pandemic.

Aims of the Plan

- Create awareness of the need for planned arrangements.
- Provide a management framework for responding to a major incident.
- Establish a Major Incident Team that manages strategies and allocates resources to ensure a major incident has minimal impact on the operation of Skills to Group.
- To co-ordinate the full reinstatement of Skills to Group services as soon as possible.
- Provide re-assurance of the practical help available at short notice.
- Pass on advice based upon previous experiences.
- Give guidance on sources of information and help.

Section 1: Scope of the Plan

The Plan will be invoked when:

- Access to any building, in part or total, is denied due to an incident.
- The business systems are interrupted.
- A health and safety incident affects staff, apprentices (learners), the local community and/or the environment.

Although not exhaustive this may include:

Inside Skills to Group

- A deliberate act of violence, such as the use of a knife or firearm.
- A fire or explosion.
- Animal escape or disease pandemic.
- Total or partial loss of electrical, water or gas supplies to a building.
- Flooding/serious adverse weather conditions.
- Disturbance or release of hazardous materials.
- Loss of critical system(s).
- The destruction or serious vandalising of part of the buildings.
- Medical emergency including death or serious injury.
- Theft.
- Bomb Threat.

Outside Skills to Group

- The death of an apprentice (learner) or member of staff.
- A transport-related accident involving an apprentice (learner) and/or a member of staff.
- Death or injuries on journeys or excursions.
- · Civil disturbances and terrorism.
- A more widespread disaster in the community.

The Plan may be invoked when an incident is likely to or will affect the business operations of Skills to Group. Members of the Major Incident Team will be placed on amber alert and be ready to react should the incident require a red alert response.

The Plan may also be activated during an externally occurring incident that impacts the personnel or business operations such as national pandemic.

Section 2: Scale of Response

The scale and type of event will determine the level of response. A full assessment of the situation will be taken by the Major Incident Team who will invoke the agreed level of the Major Incident Plan. This may include advice from members of the Management Group.

Level 1 - Amber Status

- Business interruption affecting one or more departments/functional areas and will be overcome by the relevant department/departments using their own resources, personnel and equipment and supported by the Estates Team.
- Members of the Major Incident Team will be placed on amber alert in preparation should the incident escalate.

Level 2 - Red Status

- Business interruption affecting the operation of the organisation. An incident of this nature will invoke immediate activation of the Major Incident Plan by a member of the Management Group.
- The remaining members of the Major Incident Team will be placed on red alert, and the Chair of Board will be notified. The Major Incident Room will be established (site dependant).

Notification of an Incident

If an incident, such as those previously identified, should occur in any Skills to Group building or site, the person, apprentice (learner) or member of staff who is affected by the incident, must inform a member of the Management Group or Major Incident Team. On notification of the incident, the members of the Major Incident Team may be put on amber alert as a precaution in case the incident escalates.

Out of Hours

The Data and Funding Manager, called to site in response to an incident will carry out an initial assessment investigation. If it is considered, from the initial assessment, that the incident may affect the operation, the Managing Director must be informed. The information received will be reviewed and escalated if necessary.

Major Incident Room (MIR)

The Major Incident Room will be established in:

Horizon: The Board Room

Lancastrian House: Salon, Ground Floor

Should an incident happen that results in these areas being inaccessible, then a location will be nominated on the day. If access to the site is not permitted then an external location will be identified within 24 hours and this location will be advised to all attendees.

The MIR is to be:

- A single place of contact for information relating to the business interruption.
- An area for the visual display of all information relating to the business interruption and the subsequent responses.

In the event of a major incident, the centre will be made available 24 hours a day, seven days a week, if necessary.

The Major Incident Rooms will be equipped with or located near to the following:

- Telephones with access to both internal and external networks.
- Access to a photocopier.
- IT network points with access to both internal and external networks.
- Computer equipment and peripherals.
- Televisions.
- Mobile phones.
- Suitable office furniture and whiteboards.
- Stationery.
- Refreshment facilities (Inc. for external contractors if necessary).

Management Group and Major Incident Teams

The Management Group will deal with strategy and have external focus.

Members of the Management Group/MIT Group are:

- The Managing Director
- The Data and Funding Manager
- The Operations Manager
- The Apprenticeship and Employer Engagement Manager
- The Finance/HR Manager
- Industrial Manager

Key Responsibilities of the Major Incident Team (MIT):

Life Preservation

- Identify all staff and apprentices (learners) involved, to isolate and make safe.
- Monitor progress of recovery.
- Effective and timely communications.

List of Emergency Contacts – (Telephone Numbers with the MIT Team)

- Contact all funders including ESFA/Local Authorities etc.
- Emergency Services Police/Ambulance/Fire Brigade.
- Decide alternative communication channels (see below).
- Provide accurate and regular updates to the Management Group to cascade to media and liaise with press/media. (All press releases will be approved by the Managing Director)
- · Parents or next of kin.
- Chair of Directors.
- Insurance/Telecoms/Server etc. contacts.
- Enlisting the help of trained counsellors for stress or bereavement support.
- Ensuring statutory compliance with regard to RIDDOR and HSE.
- · Identify loss of key staff

Alternative Methods of Communication/Channels/Loss of Communication

- In the event of total loss of telecommunication mobile phones and walkie-talkies can be used until the phone system is repaired/replaced. If required other forms of communication can be used such as the Internet, email, texts, Twitter, Facebook.
- Telephones IT support to send an email to Taurus, followed by a phone call, to explain situation and request support
- If required, temporary hire of mobile phones for essential staff
- IT support to contact Taurus Network systems to contact supply companies to reinstate system as quickly as possible or install additional lines

Back Up of Relevant Business Systems - Critical Information Storage and Systems

- The organisation runs one integrated network serving curriculum and admin users.
- IT support to check that the network system is fully functional and internet is not disrupted, staff could therefore access the system remotely (if required).
- In the event of replacement of computers, IT support will contact and source from main supplies e.g. PC World business.
- IT Outages IT support to contact internet provider: Lancastrian House/Horizon (Virgin).
- Network infrastructure/Server Replacement IT support to contact Taurus in the event
 of a major disruption they can refit/replace/install network cabling etc.

Back-Up and Restore Data

- IT support to ascertain the extent of the damage.
- IT support to identify requirements for essential computer functions to be operative as soon as possible.
- IT support to identify what actions required to restore the IT systems to pre-disaster operating levels.
- IT to source and oversee installation of above requirements, with reference to team members regarding insurance and recovery financing.
- Virtual server backups Horizon is backed up every 15 minutes during the day and one full back up overnight.
- Third party back up storage IT support to contact Taurus to recover lost data.
- IT support tests once a month to ensure backup systems are working.

Ongoing Access to Learning Resources/Portfolios

- Identify areas affected.
- Identify alternative resources within the organisation.
- Identify and source resources outside the organisation.
- Ensure ongoing access to apprentices (learners) learning resources and portfolios (portfolios and resources can be accessed via the Smart Assessor programme).
- Identify and source resources for those apprentices (learners) who have no or limited access to internet so they can continue working on their portfolios when offsite.

Support and Source Learning Delivery/Delivery of Teaching and Learning and Assessments if training can no longer be delivered

- Identify areas affected.
- Identify alternative teaching space within/outside the organisation.
- Reschedule teaching to alternative locations.
- If training can no longer be delivered, management and staff to support apprentices (learners) and employers to source/administer a temporary or long term provision i.e. transfer to another provider.

Alternative Sites of Operations/Site of Operations (if needed)

- · Identify areas affected.
- Identify alternative site/space within/outside the organisation.
- Establish alternative site/space and relocate staff/apprentices (learners)/resources/equipment
- Maintain core operating systems (Personnel, Finance, MIS, etc.).

Managing Transportation Needs - Transport/Alternative Modes of Transport

- Check on transport available to and from sites.
- Seek alternative modes of transport to ensure staff/apprentices (learners)/stakeholders can get home safely.
- Look at increasing the use of public transport, if no access to cars.
- Source coaches or buses.
- Contact parents/guardians to pick up apprentices (learners)/staff.
- Source taxis.
- Arrange car sharing.
- Providing extra monies for travel costs to apprentices (learners)/staff if need assistance.

Recovery

- Liaison with the insurers and loss adjusters.
- Appoint independent loss adjuster to act on behalf of Skills to Group.
- Plan specialist recovery/repair works.
- Plan re-establishment of normal operations.
- Plan re-establishment of IT and communications systems.
- Conservation and prevention of future damage.

Section 3: Action by Managing Director

Stage 1 - Initial Actions

• Open and continue to maintain a personal log of all factual information received, actions taken, and the time of those events.

- Make every attempt to clarify exactly what has happened.
- Consider whether incident requires involvement of Major Incident Team.
- If yes, mobilise MIT to appropriate Major Incident Room (site dependent).
- Notify emergency services and provide initial liaison and support.
- · Secure immediate area, and evacuate as necessary.

Outside Hours

- Arrange for a member of the Estates Team to open certain parts of the building as appropriate, and to be available (and responsive) to requests.
- Notify alarm company.
- Notify immediate administrative support.
- Think about what you are wearing when you go into Skills to Group in case you are unavoidably drawn into a TV interview.
- If the incident does attract media attention, you are likely to be inundated with requests for interviews and statements. (NB: It is especially important that if names of those who may have been involved in the incident are known DO NOT release or confirm them to anyone, before those identities are formally agreed and next of kin are informed).

Stage 2 - Once Established

Brief MIT Member Acting as On-Site Coordinator to Oversee the Following:

- Briefing of remainder of MIT.
- Ensure staff are easily identified and ID cards displayed and checked.
- Set up arrangements to manage visitors and record their names.
- Set up arrangements to enable accurate information to flow into and out of the building and for telephones calls, by ensuring brief, but up-to-date, prepared, statements are available to staff answering telephones.
- Media calls are directed to the nominated media contact point.
- An independent telephone is made available for outgoing calls.

Next of Kin Considerations:

- If apprentices (learners) are involved, the contacting of next of kin will be an important task, (remember if it is a major incident, they may well have already heard via the media). It may be appropriate to ask the parents/next of kin to come to the main site for briefings and support. This will need to be done with the utmost care.
- Arrange for a separate room with refreshments to be provided for parents away from main entrance and media.
- Maintain regular contact with next of kin.
- If incident is away from site, seek Police advice whether next of kin should travel to the scene.

Staff Considerations:

- Remember to have regular breaks, and advise others to do so.
- Maintain regular contact with MIT.
- Ensure that all staff involved know each other's roles and responsibilities.
- Be aware of how colleagues are coping and be available to see staff when required.
- Remember some members of staff may be so affected, that they will not be able to help in supporting apprentices (learners).

- Recognise also that if the burden of dealing with the situation falls disproportionately on a small number of staff, they too could need professional support.
- Unless there is overwhelming pressure, avoid closing Skills to Group and endeavour to maintain normal routines and timetables.
- Look at possible temporary staff.

Period Following the Close of the Incident:

- When appropriate, seek advice on special assemblies/funeral/memorial services.
- · Prepare full report on incident.
- Arrange to make contact with any apprentices (learners) either at home or in hospital.
- Make sensitive arrangements for the return to site (as appropriate).

Longer Term Issues:

The effects of some incidents can continue for years. Thought will need to be given to:

- · Working with staff to monitor apprentices (learners) informally.
- Clarifying procedures for referring apprentices (learners) for individual help.
- Being aware that some staff may also need help in the longer term.
- Updating facilities and resources.
- Recognising and, if appropriate, marking anniversaries.
- Remember to make any new staff aware of which apprentices (learners) were affected and how they were affected.
- Remembering that legal processes, inquiries and even news stories may bring back distressing memories and cause temporary upset within the organisation.
- Remembering that if the incident does attract media attention, it is likely that media interest will continue for many weeks.

Action by Major Incident Team

Initial Actions:

- Obtain full facts of incident from the Managing Director.
- Open and continue to maintain personal logs of information received, actions taken and the time of those events.
- Assess extent and effect of the incident on staff, apprentices (learners) and the organisation and risk assess accordingly to determine continuity plan risk level.
- Agree initial course of action and level of response.
- Identify key personnel to attend the site (as necessary).
- Mobilise Major Incident Room (site dependent).
- Notify switchboard staff of incident and media contact point.
- Notify Skills to Group Insurers.
- If coming in from home, remember to bring useful items, such as any keys needed.

Once Established:

- Fully assess the situation with Major Incident Team, identify roles and responsibilities with proposed course of action.
- Confirm agreed course of action with Managing Director and emergency services.
- · Establish regular communications updates with emergency services.
- Co-ordinate administrative support.
- Ensure on-site facilities available for all personnel.

- Ensure accurate information to flow into and out of the organisation and for telephones calls, by ensuring sufficient help is available to answer all calls.
- Maintain records of all calls received. (Staff are to be reminded that some calls could be bogus).
- Co-ordinate full building evacuation if necessary.
- Establish "incident hotline".
- · Notify utility companies and specialist contractors as necessary.
- Maintain supplies.
- Secure buildings/arrange access as appropriate.
- Co-ordinate media contact and publicity including press release.
- Establish regular communications updates with media.
- Ensure staffing lists and contact details are available.
- Ensure apprentices (learners) lists and contact details are available.
- Establish system for identifying casualties and their whereabouts.
- Co-ordinate actions for Management Group to sensitively inform staff and apprentices (learners).
- Inform suppliers.
- Ensure staff and apprentices (learners) are aware of media contact point.
- Maintain regular contact with Management Group.
- Activate departmental action plans, if appropriate.
- Report under RIDDOR (in accordance with Health and Safety Policy).

Period Following Close of the Incident:

- Co-ordinate and manage recovery to full business operations.
- Early appointment of an independent loss adjuster.
- Identify losses and update insurance company.
- Establish recovery costs.
- Allocate sufficient resources to ensure quick return to normal business operations.
- Monitor recovery programme progress.
- Manage and monitor recovery costs.
- Co-ordinate removal of damaged resources.
- Co-ordinate recovery of damaged resources.
- Notify staff and apprentices (learners) room/location changes.
- Manage contact with customers and suppliers.
- Arrange temporary accommodation if necessary.
- Notify suppliers and contractors of any changes to operations.

Longer Term Issues:

Assist Managing Director and provide subject guidance where appropriate and required.

Section 4: Operational Log

All decisions and actions taken will be recorded, and every decision will have a separate entry.

Documentation

Staff identified within the Plan will be provided with hard copies of the Business Continuity Plan. All other members of the Management Group will also be provided with copies. Staff should keep one copy at work and one copy at home. Plan holders will be expected to provide updated information relating to any contact details changes.

Debriefing

There will be an immediate debriefing, with all operational staff involved, once an incident has been successfully responded to in order to feedback problems that will be fresh in people's minds.

An additional debriefing session will take place within two weeks of the end of an incident, covering the functionality of the Plan and all groups and the process of responding to the incident in order to determine the Plan's effectiveness.

Proposals for changes and additions to the Plan will be notified to the Managing Director. These will be considered by the Management Group and Board of Directors who will pass any amendments to the Managing Director, who will then update the master document and circulate the amendments to all plan holders.

Training

Prior to the implementation of the Business Continuity Plan, all members of staff with a responsibility within the Plan will be provided with guidance and training.

Testing

The Plan will be tested at appropriate times identified by the Managing Director. The Management Group will test the Plan in order to scrutinise those parts of the Plan that are factual and measurable by either a pass or fail.

Aspects of the plan that will be tested:

- The emergency contact list.
- The Plan documentation (the forms to be used in the event of the Plan being activated).

The test will also include a talk through test for staff who have a responsibility within the plan, who will be questioned about their understanding of their role

Annual Test

The Management Team will carry out a hypothetical walk through test. This may involve the Management Team establishing an emergency situation and activation of the plan, establishing the MIT and 'walking' through the appropriate actions.

This process is intended to ensure everyone is fully aware of their roles within the plan and to identify any weaknesses that need to be addressed and improvements that need to be made.

Disaster Recovery Plan

Purpose of the Disaster Recovery Plan

Disasters are impossible to predict, but by anticipating their effects and putting in place a carefully prepared Disaster Recovery Plan, (DRP), the damage and disruption can be minimised. This Plan outlines the way in which Skills to Group will respond to disasters affecting not only the premises, but also those resulting in injury to staff, apprentices (learners) and visitors.

The Plan provides the framework for the following process:

- Implementing immediate action to ensure safety of apprentices (learners), staff, and visitors, including evacuation and treatment of casualties, liaison with emergency services, notification to families of injured individuals and the protection of assets.
- Establishing temporary arrangements to ensure that organisation activities are recommenced as soon as possible. This will necessitate finding safe, secure teaching environments, minimising inconvenience and enabling finance and administrative procedures to be resumed.
- Undertaking the planning and management of actions required to establish the mid to long-term return to normal operations.

Central to this process is the Major Incident Team (MIT), led by the Managing Director who is the Major Incident Controller.

How the Disaster Recovery will be Managed and Communicated

The Managing Director has overall responsibility of all matters pertaining to Skills to Group including Disaster Recovery implementation. The Major Incident Controller will have operational responsibility for ensuring that all necessary actions are taken to:

- Secure the immediate safety of individuals.
- Protect the site, buildings and contents.
- Arrange as soon as possible, temporary facilities to enable operations to recommence.
- Co-ordinate mid to long term plans to re-establish normal operations existing prior to the disaster.

In the event of a disaster the MIT will be responsible for assessing the scale of the disaster and deciding whether or not to implement the full recovery procedures. They will also decide when/if to activate the remainder of the Management Group.

- Assess the size of the disaster, activate the MIT (if required), and inform them accordingly.
- · Activate the Major Incident Room.
- Schedule team meetings as appropriate.
- Endeavour to handle all aspects of the disaster effectively and efficiently.

Contacts/Emergency Contacts (Telephone Numbers with the MIT Team)

- Inform funding bodies of nature and scale of disaster i.e. ESFA, Local Authorities (request assistance from these bodies as required).
- Provide accurate and regular updates to the Management Group to cascade to media and liaise with press/media (N.B. all press releases will be approved by the Managing Director).
- Emergency services: Police/Ambulance/Fire Brigade.
- Decide alternative communication channels (see above).
- Parents or next of kin.
- Chair of Directors.
- Insurance/Server etc. contacts.
- Enlisting the help of trained counsellors for stress or bereavement support.
- Ensuring statutory compliance with regard to RIDDOR and HSE.

Board of Directors

Keep directors up to date with situation

Media Liaison

- Compile and issue all communications to the media, as agreed by the MIT or Managing Director
- Endeavour to answer all requests from the media.
- Inform all staff that they should not speak directly to the media.

Staff Liaison

- Compile and issue all communications to staff.
- Receive and answer all queries from staff, on advice from the Managing Director

Student Liaison

- Compile and issue all communications to apprentices (learners) and parents as agreed by Management Group
- Put in place systems to effect this communication both to and from apprentices (learners).

ICT Recovery Systems/Back up

- Ascertain the extent of damage.
- Identify requirements for essential computer functions to be operative as soon as possible.
- Identify what action is required to restore the IT systems to pre-disaster operating levels.
- Source and oversee installation of above requirements, with reference to team members regarding insurance and recovery financing.

Premises, Insurance and Equipment Resources

- Provision of keys and access to the relevant building/site.
- Ascertain and survey the extent of damage
- Plan and oversee the salvage of property and equipment.
- · Identify immediate and longer term building requirements.
- Place orders and oversee delivery.
- Ensure that the site is secure (utilising Police if appropriate).
- Inform insurance broker of disaster (as required).
- Identify areas of the site which need to be made safe.
- Advise HSE of the disaster, after clearing this communication with the Managing Director
- Give advice on correct safety procedures as appropriate.

Finance

- Liaise with Loss Adjuster (LA).
- Make claims as advised by LA.
- Produce cash flow of requirements for immediate operation and arrange interim payments programme with LA.
- Devise and monitor payment process to facilitate recovery.

Curriculum Issues

- Ascertain the damage to coursework and any loss of examination data.
- Identifying suitable exam accommodation.

• Identify requirements for immediate and long term curriculum delivery.

Records

- Ascertain damage to apprentices (learners) records, both paper and computer based.
- Develop strategy to replace damaged records.

Management Team

- Identify teaching requirements and curriculum fulfilment within their area.
- · Identify staffing levels and timetable back-ups.
- Assist, as required or directed, other key stakeholders to fulfil any duties listed above.

Actions to be Taken to Recover From a Disaster

From the first notification of the incident, there will be the need for urgent information:

- What has happened, and how serious is it.
- Have there been any casualties.
- What facilities have been affected, and is their loss short, medium or long term.
- What access is there to the premises and when will this be possible.

The Managing Director who should be the first to be informed of the disaster, will gather this information. Having obtained this they will then:

- Contact the emergency services if not already actioned.
- Contact the MIT, as appropriate.
- · Decide where the MIT will meet, and when.
- Issue any immediate instructions as necessary to protect all individuals.

The MIT will meet to discuss the situation and decide on actions required over the first couple of days. These actions will then be delegated to the relevant team member in line with their delegated responsibilities.

The areas for consideration include:

Requirement for Staff Offices in the Event of a Disaster:

Broadly, the following would be required;

- The Management Group
- Reception and general administration including Finance and Personnel.
- Estates and ICT.
- Exams, MIS and Apprentice (Learner) Support.

Other areas, such as curriculum, would be dependent on the facilities being up and running or available at other sites.

Colleges/Schools and other organisations within a reasonable distance that may be able to assist with facilities.

Very limited capacity. Any commercial facilities available would possibly take a long time to be ready for occupation for teaching due to the nature of the curriculum. Teaching space would possibly be available after normal school hours. In the first instance, full use of facilities at other sites should be considered.

Timescale by Which Alternative Facilities Would be Needed:

Aim to get full lessons started again within at least 2 working weeks.

Issues with Planners with Regard to the Repair and Replacement of Buildings:

• We would anticipate no difficulties arising in respect of rebuilding, although plans would need to be submitted at an early stage to avoid any delay.

Area of Largest Potential Disruption:

• This would be the Horizon site where a substantial amount of the teaching occurs and from where most administration occurs.

During the initial period there is likely to be considerable activity, and therefore the MIT will need to communicate on a frequent basis. Within a few days the mid to long term strategy should be identified. After this time, the times and nature of meetings should be formalised.

Document Control

This policy will be reviewed every 6 months or earlier if deemed necessary

Date Last Reviewed: July 2021

Date to be Reviewed: Jan 2022

Authorised By

Signed

Sharon Chaffe Managing Director