Corporate Business Continuity Strategy

Contents

Document Control

This document will be reviewed and updated every 3 years or following an incident or significant corporate restructure.

Version	Author	Changes	Date Amended
1.0	Emma Reid	Adopted by SLT on 24th January 2012	2011
2.0	Bob Pocock	Section 2.2 Executive Heads bullet point 2 added	2013
2.1	Bob Pocock	Review of Business Continuity ISO 22301	2016
3.0	Chris Packer	**Complete Strategy Review & Update including:** Review & update the criteria for identifying and prioritising critical functions. Provide additional content regarding Torbay Council's BCM Roles and Responsibilities. February 2017 Audit Recommendations added. BCM Flow Chart added, BIA and Risk Analysis Templates and Resource Quantification Form added	31/01/2018

References and other useful documents:

- Civil Contingencies Act 2004
- Business Continuity Management Toolkit Version 1
- Business Continuity Management Standards (BS 25999 + ISO 22301)
- Torbay Council Performance and Risk Management Strategy

For further information about this Strategy or support with Business Continuity Planning, please contact the Emergency Planning Service on 207045 or emergency.planning@torbay.gov.uk

1.   What is Business Continuity Management?

Risk Management is an umbrella function for managing risk across Torbay Council. It is split into four main areas of service delivery:

- Corporate Health and Safety

- Corporate Risk Management

- Emergency Planning

- Business Continuity Management

Other essential services involved in managing risk include:

- Corporate Security

- Financial Services

- IT (Cyber Security / Disaster Recovery)

- Information Governance

- Legal Services, Insurance and Claims

Business Continuity Management (BCM) compliments a good risk management framework and provides a platform for understanding the risk to the councils essential services and activities.

The Civil Contingencies Act 2004 recognises the importance of BCM and requires all "Category 1 Responders" to maintain internal BCM arrangements and in addition, requires local authorities to promote BCM to commercial and voluntary organisations.

BCM involves identifying the parts of our organisation that we can't afford to lose, and planning how we can maintain them, if a disruptive event occurs. Any incident, large or small, whether it is natural, accidental or deliberate, can cause significant disruption to the services we deliver. If we plan now, rather than taking a reactive approach, we should be more resilient and better equipped to recover from a disruptive event.

To implement BCM we need to consider the following questions:

- What are the council's essential services and activities?

- What are the impacts following a disruption to essential services and activities?

- What is the maximum length of time that essential services and activities are able to tolerate disruption?

- What are the recovery time objectives for the essential services and activities to resume?

- What are the risks and threats to essential services and activities?

- What resources (e.g staff, information, communications, technology, documents, premises, partnerships, etc) are required to deliver essential services / activities?

- How can essential services and activities be maintained in the event of an incident (for example, loss of staff, loss of information, communications, technology, etc)?

2.   Business Continuity Management Planning Assumptions

This strategy is designed to assist those who are responsible for ensuring that Business Continuity Management (BCM) arrangements are implemented and embedded across the organisation.

Policies and procedures need to be embedded within the organisation to reduce the likelihood and impact of disruptive events. Risk related policies include:

- Performance and Risk Management,

- Business Continuity Management

- Emergency Preparedness, Response and Recovery,

- Corporate Security, Health & Safety, Evacuation Procedures

- Cyber Security and ICT Disaster Recovery.

- Insurance, Financial Regulations and Standing Orders,

- Information Governance (including data protection)

2.1   Definition of a Critical Function (CF)

The councils definition of a **critical function** is:

"An essential service or activity that is delivered by Torbay Council or one of its service providers"

The word "essential" is fairly subjective and can be interpreted by people in many different ways.

To provide a level of consistency, service managers should complete a Business Impact Analysis (BIA) and Risk Analysis for the services and activities that they consider "essential".

If the Impact Score is rated High (3) or Very High (4), the service manager should e-mail the completed BIA and Risk Analysis to emergency.planning@torbay.gov.uk.

The Emergency Planning Service will provide the Senior Leadership Team (SLT) with relevant information from the Business Impact Analysis and Risk Analysis.

SLT will assess the information provided and will decide whether an essential service or activity will be classified as a **"critical function".**

3. Business Continuity Management Framework

There are 3 elements to the BCM Framework at Torbay Council, as follows:

1. Corporate Business Continuity Plan

The 'Corporate Business Continuity Plan' consists of a Corporate List of Critical Functions and a suite of departmental / service area Business Continuity Plans that can be activated when a large / widespread disruptive event affects several departments and service areas over a protracted period of time.

Examples of large / widespread disruption that may require the activation of the Corporate Business Continuity Plan include Pandemic Influenza, Cyber Attack or Transport Disruption due to Severe Weather or Fuel Shortage)

2. Department / Service Area Business Continuity Plans

Departmental / Service Area Business Continuity Plans can be activated individually to manage small / localised disruptions within individual departments or service areas.

3. Location Specific Business Continuity Plans

Location Specific Business Continuity Plans are required to manage localised disruptions to specific council buildings where critical functions may be affected. For example: Loss of Access to Torquay Town Hall or Tor Hill House.

Type of BC Plan	Components	Owner
Corporate	Corporate List of Critical Functions + Service Area Business Continuity Plans	Senior Leadership Team
	Staff Matrix?	Assistant Director: Corporate & Business Services?
	List of Critical Function ICT requirements	Executive Head: Customer Services
Departmental / Service Area	Service Area Business Continuity Plans	Department / Service Manager
Location Specific	Business Continuity Plans for: Loss of a Building / Part of a Building	Designated Building Manager (an appropriate member of the Senior Leadership Team)?
	Business Continuity Plan for: Loss of Utilities (Water, Gas, Electricity)	

4. Business Continuity Management Responsibilities

4.1 Service Area Managers:

- Identify the essential services and activities delivered by your service area

- Undertake a Business Impact Analysis and Risk Analysis (Appendix B & C)

- Notify emergency.planning@torbay.gov.uk of any essential services and activities that achieve a Business Impact Assessment score of 3 or above.

- If the Senior Leadership Team have classified your service or activity as a "critical function", complete a Resource Quantification Form (Appendix E) to identify the resources that are essential for maintaining your critical functions.

- Produce Business Continuity Plans that contain robust mitigation measures to ensure that critical functions are maintained and recovered during a disruptive event.

- Where critical functions are commissioned, contracted or provided by other organisations seek assurance that robust Business Continuity Plans are in place to maintain and recover critical functions during a disruptive event.

- If you are unable to mitigate the risk within your service area, record the risk on the service specific (operational) risk register.

- Ensure that your Business Continuity Plan is signed off by the appropriate member of SLT.

- Send a copy of your Business Continuity Plan to emergency.planning@torbay.gov.uk and ensure that other relevant staff have access to a copy.

- Ensure that staff are aware of BC arrangements and receive appropriate and relevant training.

- Carry out a Table Top or Live Exercise to test and validate your Business Continuity Plan(s).

- Ensure that your Business Continuity Plans are reviewed, updated and exercised annually or following a significant corporate re-structure.

- Consider whether Business Continuity arrangements are required for non-critical functions.

- Consider the effects of an increased demand on services for an extended period, for example the need to respond to a major emergency such as a major flood event, communicable disease outbreak or coastal pollution incident.

- Consider activating your Business Continuity Plan, if a disruptive event has occurred, or is likely to occur. (Refer to Section 5.4.2 for further information)

- Notify the appropriate member of the Senior Leadership Team if the disruptive event has had, or is likely to have, an impact on your critical functions.

- If established, attend the Business Continuity Management Team on request (See Section 5.4.4)

4.2   Senior Leadership Team:

- Review the essential services and activities that have been submitted by service area managers.

- Decide which essential services and activities should be classified as "critical functions"

- Notify the Emergency Planning and ask them to update the "Corporate List of Critical Functions".

- Notify the Corporate Support Team and ask them to update the Corporate Risk Register.

- Ensure that Service Managers have completed Business Continuity Plans that contain robust mitigation measures to ensure that critical functions are maintained and recovered during a disruptive event.

- Review and sign off departmental / service area Business Continuity Plans

- Review Business Continuity Management arrangements every 3 months or following an incident or significant corporate re-structure.

- Ensure that Business Continuity requirements are written into contracts when commissioning, contracting or sharing services that deliver critical functions on behalf of the council.

- Consider how Business Continuity assurance will be provided by commissioned services, joint ventures or contracted services.

- If required, establish an Incident Management Team to coordinate the council's emergency response and recovery activities.

- Establish a Business Continuity Management Team if a significant number of departments or service areas have been affected, or are likely to be affected by a disruptive event.

- Use the Corporate List of Critical Functions to identify and prioritise the councils critical functions and ensure that the relevant Business Continuity Plans are activated during a disruptive event.

- Consider the impact of increased demand on services for an extended period, for example the need to respond to a major emergency such as a major flood event, communicable disease outbreak or coastal pollution incident.

- Ensure that a debrief takes place following a disruptive event. A debrief report should identify the learning points and any subsequent recommendations should be used to form an action plan.

4.3   Emergency Planning Officer (EPO):

- Provide quarterly briefings to the Senior Leadership Team regarding BCM arrangements which may include updates on new critical functions, business continuity plans, training & exercising.

- Provide advice and support to officers with responsibility for writing Business Continuity Plans.

- Maintain a record of BC plans and upload onto the Resilience Direct website

- Facilitate and/or support BC training and exercises to ensure that plans are tested and relevant staff have an awareness of the councils Business Continuity Management arrangements.

- Provide advice and support following activation of the Business Continuity Management Team (BCMT) during a disruptive event / business continuity incident.

5. Business Continuity Management (BCM) Cycle

The Business Continuity Management (BCM) cycle consists of six elements as set out in the Business Continuity Management Standard (BS 25999-2) and depicted in the diagram below.

BS 25999-2 has been superseded by ISO 22301, but the council has taken the decision not to adopt the new standard, for the following reasons:

1. BS 25999 had been, and continues to be, used by many organisations across the world as the basis of their BCM procedures and processes.

2. A comparison of BS 25999-2 and ISO 22301 identifies that both standards include many of the same core elements. The new concepts contained ISO 22301 do not provide significant added value to justify updating Business Continuity Plan to the new standard.

5.1 BCM Programme Management

Effective programme management is integral to the cycle and should ensure that Business Continuity Management capability is established and maintained within your organisation.

There are three steps in the process:

- Assigning responsibilities (Refer to Section 4);

- Establishing and implementing BCM within Torbay Council; and

- Ongoing management provided by the Senior Leadership Team and Service Managers

5.2   Understanding the Organisation

A Business Impact Analysis (BIA) and Risk Analysis should be carried out to facilitate an understanding of our organisation and to build our Business Continuity Management capability.

5.2.1 Step 1: Business Impact Analysis (BIA)

A Business Impact Analysis (BIA) is a process which identifies:

- The council's essential services and activities (including important deadlines and timeframes)

- The impact that would occur if the essential service / activity is disrupted.

- The maximum length of time that essential services / activities are able to tolerate disruption

- The recovery time objectives for essential services / activities to resume

Impacts caused by disruption to essential services include:
- Breach of Statutory Duties or Regulatory Requirement
- Damage to the Economy (Business & Tourism)
- Damage to the Environment
- Financial Impact (Income / Payments / Claims)
- Health, Safety and Welfare of Staff / Public
- Impact on Reputation
- Impact on Interdependencies (Other Service Areas / Contractors / Providers / Partnerships)

The Business Impact Analysis template (Appendix B) should be completed by Service Managers.

5.2.2 Step 2: Risk Analysis

Risk Analysis, within the context of Business Continuity Management, is a simple process of identifying the risks and threats that are likely to cause disruption to essential services and activities.

These include:
- Loss of Staff
- Loss of ICT (Network, Hardware, Software, e-mail, etc.)
- Loss of Telecommunications
- Loss of a Key Supplier, Contractor, Service Provider
- Loss of a Data / Records
- Loss of Income
- Loss of Premises
- Loss of Utilities (Water, Gas, Electricity, Fuel)

The Risk Analysis template (Appendix C) should be completed by Service Managers. It assesses the potential impact of risk and threats and provides an opportunity for the council to mitigate risk before a disruptive event occurs.

5.2.3 Step 3: Consultation with the Senior Leadership Team

Service Managers should submit BIA and Risk Analysis information to the Senior Leadership Team if the Impact Score is rated High (3) or Very High (4).

If the Impact Score is rated 2 (Medium) or 1 (Low) the service manager will manage the risk and will decide whether a Business Continuity Plan is required to mitigate disruption to the service.

The Senior Leadership Team should then decide which services and activities need to be classified as "critical functions". The services and activities that are classified as critical functions should be added to the Corporate Risk Register by the Corporate Support Team.

The Corporate List of Critical Functions forms the basis of the Corporate Business Continuity Plan and can be used by the Business Continuity Management Team (BCMT) to identify and prioritise critical functions during a disruptive event.

The Corporate List of Critical Functions is maintained by the Emergency Planning Service.

5.2.4 Step 4: Resource Requirements

A 'Resource Quantification Form' (Appendix E) should be completed for each critical function.

Details captured on the Resource Quantification Form should include:

People

- The optimum number of staff that is required to deliver the critical function
- The minimum staffing level with which some sort of service could be provided
- The skills / level of expertise that are required to deliver the critical function

Premises

- The locations that critical functions operate from
- The office facilities, furniture and equipment that is essential to carry out your critical function

Technology

- The Computer Hardware and Software that is essential to carry out your critical function
- The specific systems and means of voice and data communication that are required to carry out your critical functions and how long could you reasonably be expected to deliver your critical function without them.

Information

- The information that is essential to carry out your critical function
- How and where this information is stored
- How this information is accessed and retrieved

Other Service Areas, Commissioned Service Providers, Contractors, Suppliers and Partners

- The priority suppliers / partners whom you depend on to deliver your critical function
- The critical functions that are contracted / delivered by partner agencies
- The reciprocal arrangements between services areas, departments and other organisations

5.3   Determining BCM Strategy

This stage of the BCM process is about identifying and documenting the actions that we can take to maintain the resources that underpin the delivery of the council's critical functions.

For example, the mitigation strategies that we might consider for dealing with staff absence might include some or all of the following (this list is not exhaustive):

- Ability to work from home if there is no access to the workplace or staff are unable to travel

- Inventory of staff skills not utilised within their existing roles - to enable redeployment

- Process mapping and documentation - to allow staff to undertake unfamiliar roles

- Multi-skill training of each individual

- Cross-training of skills across a number of individuals succession planning

- Mutual aid or the use of third party support, backed by contractual agreements

Services managers will be required to complete a Business Continuity Plan (Appendix F) to ensure that their critical functions can be maintained and recovered during a disruptive event.

Service Managers should use the Business Continuity Plan template provided in Appendix F. This will help to ensure that consistent Business Continuity arrangements are in place across the council.

Guidance on completing a Business Continuity Plan (Appendix G) has been provided to assist managers who are responsible for writing plans. The Emergency Planning Service may also be available to offer advice and support.

Service Managers should ensure that their Business Continuity Plans contain robust mitigation strategies. This may include consulting with corporate support services (ICT, HR, FM etc) if the service that they provide is considered essential for maintaining a critical function.

Where a critical function is commissioned, contracted or provided by another organisation, the service manager should seek assurance that robust Business Continuity Plans are in place to maintain and recover critical functions during a disruptive event.

5.4   Developing and Implementing a Response

5.4.1 Preparedness

The Emergency Planning Service will monitor the hazards and threats that have been identified on the Local Resilience Forum (LRF) Community Risk Register (CRR) and will anticipate, so far as is reasonably practicable, any potential incidents that could affect the council.

In some situations it may be possible to assess the impact of a disruptive event and consider mitigation strategies prior to the event occurring. For example, a flu pandemic or a prolonged period of cold weather, snow and ice.

If the Emergency Planning Service becomes aware of an incident that could affect the delivery of critical functions, they will notify a Director, Assistant Director or Executive Head and will recommend that an Incident Management Team and/or Business Continuity Management Team (BCMT) is established (Refer to Section 5.4.3 / 5.4.4)

5.4.2 Activation of Business Continuity Plans

Individual Business Continuity Plans

Minor disruptive events can generally be managed within individual departments or service areas.

Service area managers should activate their Business Continuity Plans if their delivery of their critical functions is at risk from a disruptive event.

For example, what would happen if multiple members of staff within a service area were expected to be off sick for a week or more, or an essential database was unavailable for several days?

For these examples, the expectation would be that the service manager would activate their Business Continuity Plan and apply the mitigation measures that have been written into their plan. This may involve redeploying staff from other teams under their management, re-prioritising workloads, and identifying alternative ways for working of accessing information.

The service manager should notify the relevant Director, Assistant Director or Executive Head if a Business Continuity Plan has been activated or is close to being activated.

Once the plan has been activated, the staff that work in the affect area should be contacted, if not already aware, and asked to be on standby to receive instructions.

The service manager should consider the impact on other service areas and ensure that, where appropriate, all key stakeholders/partners are informed and updated.

The service manager should also maintain a log of any decisions made or actions taken.

The Corporate Business Continuity Plan

If a large / widespread disruptive event (e.g pandemic influenza, cyber attack, fuel crisis, etc) affects several departments and service areas over a protracted period of time, it may be necessary to activate the "Corporate Business Continuity Plan".

The 'Corporate Business Continuity Plan' consists of a Corporate List of Critical Functions and a suite of Departmental / Service Area Business Continuity Plans.

This decision to would be taken by a member of the Senior Leadership Team and, in this instance, Business Continuity activities would need to be managed locally but monitored and coordinated strategically by a Business Continuity Management Team (Refer to Section 5.4.4).

5.4.3 Incident Management Team

An Incident Management Team may be established to coordinate the council's emergency response and recovery activities. The Incident Management Team should also consider the impact on council services and, if required, will ensure that a Business Continuity Management Team is established.

5.4.4 Business Continuity Management Team (BCMT)

A Business Continuity Management Team (BCMT) should be established if a significant number of services or activities have been affected, or are likely to be affected by a disruptive event.

The role of the Business Continuity Management Team is to:

- Assess the Risk or Threat.

- Identify the services and activities that are likely to be affected

- Prioritise the delivery of the councils critical functions

- Gather / Analyse Information (e.g daily absenteeism reporting)

- Assess the impact on corporate critical functions

- Establish Recovery Time Objectives

- Activate relevant Business Continuity Plans (e.g Service Area, Building or ICT Plans)

- Identify resource requirements (staff, suppliers, IT, communications, documents, premises etc.)

- Identify the options for preventing, reducing, mitigating disruption

- Take action to ensure that corporate critical functions are maintained.

- Take action to ensure the recovery of corporate critical functions

- Maintain a log of decisions, actions, costs, etc.

- Liaise with the Incident Management Team (if established to coordinate the response to an emergency)

- Provide relevant information to staff, elected members, commissioned services, contractors, suppliers and other partner agencies.

- If services are likely to be disrupted, provide effective and timely communication with the public.

- Monitor staff welfare issues: health and safety, mental health, morale, working hours, etc.

Membership of the Business Continuity Management Team should include:

- Business Continuity Incident Manager (Chief Executive, Director or Executive Head)

- Departmental Leads (who are responsible for maintaining critical functions)

- Service Managers (who are responsible for maintaining critical functions)

- Critical Support Services (Human Resources, ICT, Facilities Management, etc)

A Business Continuity Management Team Agenda is available in Appendix H

5.5 Exercising, Maintaining and Reviewing BCM arrangements

This element of the BCM lifecycle details the various ways that plans can be validated by testing and exercising. It also reiterates the importance of monitoring, reviewing and updating plans at regular intervals to ensure plans remain fit for purpose.

5.5.1 Exercising

BCM arrangements cannot be considered reliable until they are exercised and have proved to be effective. Exercising should involve; validating plans, rehearsing key roles and responsibilities; and testing systems which are relied upon to deliver resilience. The four main types are: Testing, Discussion, Table-top and Live Exercises. Whatever type of exercise you opt for, it is worth inviting stakeholders such as partner organisations. It would also be prudent to invite other business units/stakeholders that you rely on to deliver your critical functions.

The frequency of exercises will depend on available resources, but should take into account the rate of change (to the organisation or risk profile), and outcomes of previous exercises (if particular weaknesses have been identified and changes made). As a minimum, Business Continuity Plans should be exercised annually or following an incident or significant corporate restructure.

It is important to record and evaluate exercises by undertaking a debriefing immediately after the exercise. A subsequent 'lessons identified' report should be produced to highlight any actions or recommendations that may be required. The report should be made available to the relevant service area manager(s) and there representatives within the Senior Leadership Team.

Not all aspects of a plan can be **tested**, but some crucial elements can be, such as the contact list and the activation process. You can also test your IT and communications equipment and information management arrangements.

A **discussion** based exercise is the cheapest to run and easiest to prepare. This type of exercise will bring staff together to inform them of the plan and their individual responsibilities. It will also involve a discussion of the plan to identify problems and solutions. This type of exercise is particularly useful for training purposes and provides an important tool for embedding BCM in our organisational culture. It is also effective for initial validation of new plans.

A **table-top** exercise is scenario based and is likely to offer the most efficient method of validating plans and rehearsing key staff. It brings staff together to take decisions as a scenario unfolds in very much the same way they would in the event of a real incident. Ordinarily it will be held in a round table format and last between 2 hours and half a day. The advantage of this type of exercise is that it engages players imaginatively, generates high levels of realism and provides participants with an opportunity to get to know the people with whom they would work in the event of a real incident.

The Emergency Planning Service has access to a number of exercise scenarios and may be able to facilitate or provide support to managers with the planning and delivery of exercises.

A **live exercise** can range from a small scale test of one component, such as evacuation, through to a full scale test of all components of the plan. Live exercises are a necessity for components such as evacuation that cannot be tested effectively in any other way. While single component tests are relatively easy to set up, full tests are much more complex and can be costly. Before embarking on a live exercise it is important to consider whether we have the necessary capacity to run the exercise without it causing a disruption to service delivery.

5.5.2 Maintaining

The Senior Leadership Team should ensure that service managers update their Business Continuity Plans annually or following an incident or significant corporate restructure. The review should include:

- Essential services or activities that have been submitted to SLT for consideration

- Changes to the organisation, including restructures and staffing and resources

- Changes to methods of the delivery of critical functions

- Changes to the external environment in which the organisation operates; and

- Lessons identified from exercises or actual incidents

A version control has been incorporated into the BCM Strategy and BC Plan template to ensure that the council is able to identify when the document was last reviewed and/or updated. The version control should also indicate what the changes are and why the changes have been made.

5.5.3 Reviewing

Torbay Councils BCM arrangements should be reviewed by the Senior Leadership Team every 3 months or immediately following an incident or significant corporate restructure. Actions arising from the 3 monthly review of BCM arrangements should be recorded by a Governance Support Officer and assigned to the relevant Service Manager.

BCM arrangements will also be assessed *insert frequency here* by the Devon Audit Partnership.

The review should be documented and should verify that:

- The Corporate Business Continuity Strategy is fit for purpose and up to date

- The councils critical functions and supporting resources have been identified;

- Arrangements accurately reflect the councils strategic objectives;

- Arrangements are fit for purpose, and appropriate to the level of risk that the council faces;

- Maintenance and exercising programmes have been effectively implemented;

- BCM arrangements incorporate improvements identified during incidents and exercises and in the maintenance programme;

- An effective programme for training and awareness raising is in place; and

- Change control procedures are in place and working effectively

BCM arrangements should be assessed against the British Standard on Business Continuity Management (BS 25999**)** or the new International Standard ISO 22301.

The Emergency Planning Service will also be available to provide information and advice to the Senior Management Team and the Devon Audit Partnership, as required.

Outputs from exercising, maintaining and reviewing BCM arrangements should include:

- A position statement on Business Continuity Plans and ICT Recovery Plans

- An exercise programme, including the aims and objectives

- Recommendations from exercises or actual incidents that have occurred

- Evidence that Business Continuity risks are being transferred to the Corporate Risk Register

- A Business Continuity Management Report

5.6 Embedding BCM in the organisations culture

To be successful **BCM** has to become part of Torbay Council's culture. This can be achieved through a combination of awareness raising and training.

5.6.1 Awareness

Raising and maintaining awareness of BCM with staff to ensure that they are aware of why BCM is important to Torbay Council. Mechanisms for raising awareness include:

- Involving staff in the development of the organisation's strategy;

- Written and oral briefings;

- Learning from internal and external incidents; and

- Discussion based exercises

All new staff should be made aware of the organisation's BCM arrangements on joining and this should form an integral part of the induction process.

5.6.2 Training

It is good practice to ensure that staff with business continuity responsibilities receive training on Business Continuity Management.

As a minimum it is recommended that staff are made aware of this document and understand the process of Business Continuity Management.