South Hams District Council
and
West Devon Borough Council

Business Continuity Management Strategy

Sophie Hosking - Executive Director

<u>Business Continuity Statement</u>

South Hams District Council and West Devon Borough Council are fully committed to the public we serve, our employees, and partner agencies we work with. The Councils recognise their statutory duties to continue to provide services to safeguard the public and property. We recognise the potential strategic, operational and financial risks associated with a business interruption and the importance of maintaining our services if an emergency occurred.

To demonstrate our commitment to safeguarding the delivery of our essential services, we are preparing a Business Continuity Management Plan. This statement, and the associated management systems detail how South Hams District Council and West Devon Borough Council will respond to a crisis or incident that may impact on our ability to continue to deliver services to the public, and how this impact will be minimised.

Over recent years both Councils have been subjected to a number of incidents that had the ability to impact on business delivery such as Swine Flu, Severe Weather including snow storms etc.

Our current working model provides an increased resilience to such emergencies. It is recognised that we are highly reliant on our ICT services. Therefore, external resources may be required to support this team to ensure communication systems and critical infrastructure is recovered as quickly as possible.

It also recognised that a business continuity emergency is likely to occur at the same time as the Council being involved in a major civil emergency. The Council has a statutory duty under the Civil Contingencies Act 2004 to ensure that it can continue to deliver support to any emergency response. Therefore this plan and its contents need to be read alongside the Councils' Major Incident Response Plan.

The ability of the organisations to be resilient to emergencies and recover from them quickly is the responsibility of all staff. I will be responsible for promoting and embedding business continuity at all levels of the organisation.

It will be the responsibility of the Councils' Senior Leadership team (SLT) to monitor the implementation of this policy and the councils' overall risk management performance. This will be achieved through the use of regular reporting commissioned by SLT and annual audits.

The Risk Management Group will be responsible for ensuring the work programme is delivered. They will champion business continuity within the Community of Practice business areas. They will also provide support during incidents to more critical functions where necessary and as directed.

The organisations have identified that technical expertise for business continuity will be provided by the Environmental Health Community of Practice. They will work in partnership with the Devon Emergency Planning Service to provide advice and support to the organisation as necessary.

We expect all staff to take reasonable steps to be aware of the policy, risk assessments, and the controls identified. To support the Community of Practice leads in assessing risks, implementing controls, and to actively engage in any training, exercises or workshops arranged to reduce the organisations business continuity risk.

Members are asked to make themselves aware of the business continuity arrangements, and during crises support the incident management teams.

The Councils are committed to ensuring that the implementation of the business continuity management system is adequately resourced to enable the full implementation of this policy. This commitment includes the provision of sufficient financial resources, management and employee time, training and business continuity advisory support. The company has appointed risk management advisors and specialists to provide competent health and safety and business continuity advice.

This Business Continuity Management Statement and the Organisation and Arrangements that support it will be reviewed at least annually or more frequently where there have been significant changes to the Councils or factors affecting the Councils' activities.

Signed:_____   Date: _____

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1.0 What is Business Continuity Management?

Business continuity management sits alongside the other strands of risk management that the Council undertakes including;

- Health and Safety
- Emergency Planning
- Financial Risk Management including Audit

Like these other areas the Councils are under a legal obligation to have a business continuity plan that ensures that it can continue to support the efforts of the emergency services and other partner agencies during a major incident, this duty is made under the Civil Contingencies Act 2004.

Business continuity is a term to describe how we assess risk posed to the business, the procedures put in place to minimise those risks, and to ensure that the organisation can continue to deliver essential functions at times of crisis.

Business continuity planning involves asking the various communities of practice that operate within the Council a series of questions to determine how important the functions they deliver are; when set against the strategic policy of safeguarding life/welfare and property in a crisis.

Those services deemed essential will then be asked to consider;

- The impacts on their services from a disruption?
- How long could the organisation tolerate that service being disrupted (maximum tolerable period of disruption)?
- The length of time before it would be untenable to recover a service (recovery time objective)?
- What are the reasonably foreseeable hazards posed to a service?
- What is the minimum that an area needs in order to deliver its services (i.e. staff, information, communications, technology, premises, partners etc.)?
- How could they deliver the services differently if the resources were not available?

The answers to the above questions will then be used to develop service level business continuity plans.

For those service areas that are not deemed essential the Heads of Practice will be required to follow this overarching plan, and to offer support/resources to essential services.

There will also be asset specific business continuity plans for each of the essential pieces of Councils estate such as Follaton House, Kilworthy Park, Totnes Depot, Salcombe Harbour etc. These plans will consider the risk posed to service users for loss of access or loss of utility, and the solutions to such a crisis.

2.0 <u>Who is responsible for Business Continuity?</u>

Similarly to health and safety it is the responsibility of all staff, elected members and partners to ensure that they are minimising the potential risks to the organisation. This includes ensuring compliance with our data security procedures, IT security procedures, and building security procedures.

To ensure compliance with our legal duties the Councils have appointed the Environmental Health Community of Practice to be responsible for providing technical support to the organisation in developing the business continuity management systems (BCMS). The Environmental Health Head of practice has nominated a Senior Specialist with experience in Emergency Planning and Business Continuity to be the Councils' advisor.

The Councils are also member of the Devon Emergency Planning Partnership, who provide technical support to the Environmental Health service in developing both Emergency and Business Continuity Plans.

However it will not be the Environmental Health CoP on their own delivering the BCMS, we will need to ensure that business continuity is embedded into the culture of the organisation and our partners who deliver services on our behalf.

It will be the responsibility of the Extended Leadership Team and the Health and Safety Management group (renamed Risk Management Community of Practice) to develop and deliver the business continuity work programme. This work programme and its delivery will be audited by internal audit and the results presented to Senior Leadership Team.

2.1 The role of Heads of Practice in Business Continuity Management

The Heads of Practice will:-

- Attend or send a business continuity champion to the Risk Management Community of Practice meetings to identify work for their community of practice and deliver feedback on previously given tasks
- Undertake the business impact analysis and risk analysis for their community of practice
- For those essential services they must also complete a resource impact assessment
- Produce service area business continuity plans that assess the particular risks to the business and details the mitigation measures put in place to ensure functions are maintained and recovered during and after an event.
- Ensure that where essential services are commissioned, contracted or provided by other organisations, that these 3rd party plans are robust and thoroughly tested, to ensure these services are protected during a disruptive event.
- Where a risk cannot be mitigated, ensure that this risk is entered onto the corporate (operational) risk register for review.
- Ensure that their business continuity plans are approved by the relevant SLT member.
- Familiarise the relevant portfolio holder with the plan.

- Ensure that the most up to date business continuity plan is sent to the environmental health community of practice lead (currently James Kershaw) for storing electronically on the Councils' cloud based document storage system (Resilience Direct).
- Ensure that staff within the community of practice are aware of the business continuity plan, including any controls that have been put in place.
- Engage in any relevant training and exercising developed for their Community of Practice or corporately.
- Ensure that their business continuity plans are reviewed and updated in line with the corporate business continuity work programme, to ensure that non-critical functions are not more critical, and that the resource requirements have not changed.
- Identify if a situation has arisen that may lead to the activation of a business continuity plan, and after activating appropriate measures notify a member of SLT and the Business Continuity advisor.

2.2 The role of Senior Leadership Team in Business Continuity Management

The Senior Leadership Team will:-

- Support the Business Continuity advisor in identifying the essential services and which of these should be classified as "critical functions"
- Note any additions to the operational risk register and determine whether further work and budget should be allocated to these risks.
- Ensure through the corporate appraisal scheme that the Heads of Practice are engaged with the business continuity work programme and are delivering their planning requirements on time.
- Review and sign off Community of Practice business continuity plans, following review by the Risk Management Group.
- Nominate a chair for the risk management group from within the Senior Leadership Team.
- Review the Councils' Business Continuity Management Strategy and arrangements every 3 months or following incident.
- Partake in training and exercises identified by the BC advisor as fulfilling a need
- Ensure that business continuity forms part of any contractual arrangements and tendering processes we have with 3rd party organisations.
- If required, establish an Incident Management Team to co-ordinate the Councils' crisis response and recovery activities.
- Consider the critical functions list when prioritising resources in a crisis response.
- Nominate a loggist to record all decisions made, in an appropriate manner that will withstand legal scrutiny.
- Appoint a person either internally or externally to undertake a debrief and produce a report on lessons learned from any incident.

2.3 The role of the Business Continuity Advisor

The senior specialist with responsibility for business continuity will:-

- Attend the monthly risk management meetings and gather evidence on the deliverability of the work programme, a report will then be produced on a quarterly basis for SLT.
- Act as the single point of contact between Devon Emergency Planning Partnership and the Councils and act as an information conduit.
- Provide technical support to the Heads of Practice and Senior Leadership Team in writing the business continuity plans.
- Maintain a record of all completed business continuity plans and upload the documents onto Resilience Direct
- Maintain and collate the critical functions list by analysing community of practice plans, and having taken instruction from SLT.
- Provide advice and support to the critical incident command group during a disruptive event/ business continuity incident.
- Act as local authority liaison officer with the emergency services where needed.

3.0 Business Continuity Management (BCM) Lifecycle

ISO 22301:2012, is the international standard for business continuity and it specifies the requirements that a business would need to follow in order for their BCMS to be certified. It is the intention that the Councils system will be developed in accordance with this standard to ensure compliance with our statutory obligations.

The standards is based around the BCM lifecycle model, this is a 6 part system as shown below;

Figure 1. Business Continuity Management Lifecycle

The lifecycle model helps to shape the work programme, and in accordance with the good practice guidance produced by The Business Continuity Institute the lifecycle can be defined further as below:-

• Embedding: this is the process by which we integrate business continuity into the day to day activities of the organisation, so that it becomes a normal part of the business.

• Analysis: this is the process of reviewing and assessing the organisation to identify its objectives, how it functions and the constraints by which it operates. This will be done through business impact assessments, and will help to identify the essential services offered by the Councils.

• Design: Following the impact assessment, this stage considers the hazards to the business and considers ways of reducing the risk through appropriate controls.

• Implementation: this is the process by which the designed controls are written into section business continuity plans. This stage also includes the development of the organisations response structure.

• Validation: Once the business plans have been written, they will be tested through workshops, and the development of exercises. The plans will also be validated if tested during a disruptive event, and lessons learned from any debrief report.

3.1 Business Continuity Management Programme

Ensuring delivery of the management programme will be essential to the success of the developing and embedding business continuity into the organisation. The first stage of the management programme will be to assign responsibilities, this is outlined in section 2.0 of this document.

The business continuity programme for 2019/20 in appendix A has been developed in conjunction with the risk management community of practice. The aim of the programme is to fulfil the first cycle of the business continuity management lifecycle without putting too much pressure on already stretched resources.

The template community of practice business continuity plan can be found in appendix B of this document.

4.0 Developing and implementing the incident response and crisis management (Look here 1st in the event of an incident)

4.1 Horizon Scanning

The Devon Emergency Planning Partnership will escalate concerns regarding any likely rising tide disruptive event through the Business Continuity Advisor. Utilising their knowledge of the business and the potential impacts from the event, it may be possible to develop mitigation strategies prior to the event occurring. Examples of rising tide events would be pandemic flu, prolonged periods of cold weather, BREXIT.

Should a sudden impact event occur, then the Business Continuity Advisor will advise SLT to set up a crisis management team and for the relevant business continuity plans to be activated.

If this has not happened and you are aware of an incident arising please contact the Business Continuity Advisor (James Kershaw, tel. 01803 861287).

4.2 Activation of Business Continuity Plans

4.2.1 Service level plans

Where an incident is small and only impacting on a single service within a community of practice then this can generally be dealt with by the head of practice, without the need to activate this overarching strategy.

For example, if an outbreak of illness is impacting on one particular team and their ability to deliver a function, then it would be expected that the Head of Practice would activate their service level business continuity plan. Where a service does not have a business continuity plan due to not being deemed essential, then the event and impact should be raised to the Specialist Managers and the Case Management Managers.

If a business continuity plan has been activated then the reason for activating the plan, and any steps taken should be communicated to the Business Continuity Advisor and SLT.

Make sure you keep a log of any decisions taken.

4.2.2 The corporate business continuity response arrangements

In the event of a larger or widespread disruptive event (e.g. pandemic influenza, cyber-attack, fuel crisis, etc.) which is likely to effect a larger number of service areas, then it may be necessary to activate the response arrangements within this section of the plan.

The decision to activate this plan and the crisis management team can only be made by a member of the senior leadership team. In the event of this occurring all business continuity activities will be co-ordinated by this group and heads of practice should defer decisions to the team.

4.3.3 The Crisis Management Team (CMT)

A CMT 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 Crisis 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 crisis management team will be as follows, if the nominated person is unavailable they will nominate a deputy.

- Sophie Hosking (Head of Paid Service)
- Lesley Crocker (Head of Practice for Communications)
- Catherine Bowen (Head of Practice for Legal)
- Neil Hawke (Specialist Manager Support Services)
- Drew Powell (Specialist Manager Customer First)
- Lisa Buckle (S.151 Officer)
- Andy Wilson (Head of Practice for Human Resources)
- Ian Luscombe (Head of Practice for Environmental Health)
- Helen Dobby (Commercial Services Group Manager)

An organisational chart for the proposed crisis management team is shown in Appendix C, and a template agenda for the meeting can be found in Appendix D.

References

Good Practice Guidelines 2018, The Business Continuity Institute

Appendices

Appendix A: Proposed work programme

|	JAN	FEB	MAR*	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
					G	O	L	D					SLT
Capability		Invacuation Drill	Crisis Media Training	Training	Walkthrough	Evacuation Drill	Desktop	IT DR Test	Corporate Risk Appetite	Simulation	Combined Simulation		
BCMS	Policy	Strategic BIA	Awareness Campaign Week	Individual Competence Training	Assurance				Risk Treatment Plan	Management Review		Audit	
					S	I	L	V	E	R			COP
Capability		Invacuation Drill		Training	Walkthrough	Evacuation Drill	Desktop	IT DR Test		Simulation	Combined Simulation		
BCMS	BC Manual	Tactical BIA	Awareness Campaign Week	Individual Competence Training	Assurance	Emergency Services Liaison		Insurance Renewal	Risk Assessment	Management Review		Audit	
					B	R	O	N	Z	E			COPs
Capability	Battlebox check	Invacuation Drill		Training	Walkthrough	Evacuation Drill	Desktop	IT DR Test		Simulation	Combined Simulation		
BCMS		Operational BIA	Awareness Campaign Week	Individual Competence Training	Assurance				Risk Assessment	Management Review		Audit	
BCC	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	BCC Mthly	

* Annual BCI Global BCAW

Policy	Business Impact Analysis	Risk Assessment	Business Continuity Planning	Disaster Recovery Plan	Emergency Response	Crisis Management	Training and awareness	Exercise Rehearsal	Assurance	Internal Audit	Performance Improvement	Management Review

Appendix B: Community of Practice Service Level Template

This can be accessed on the Council Intranet or by emailing environmental.health@swdevon.gov.uk and requesting a copy.
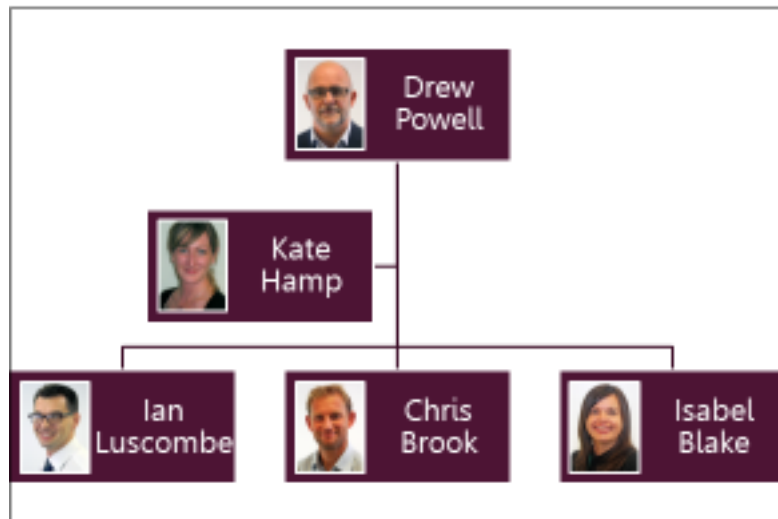
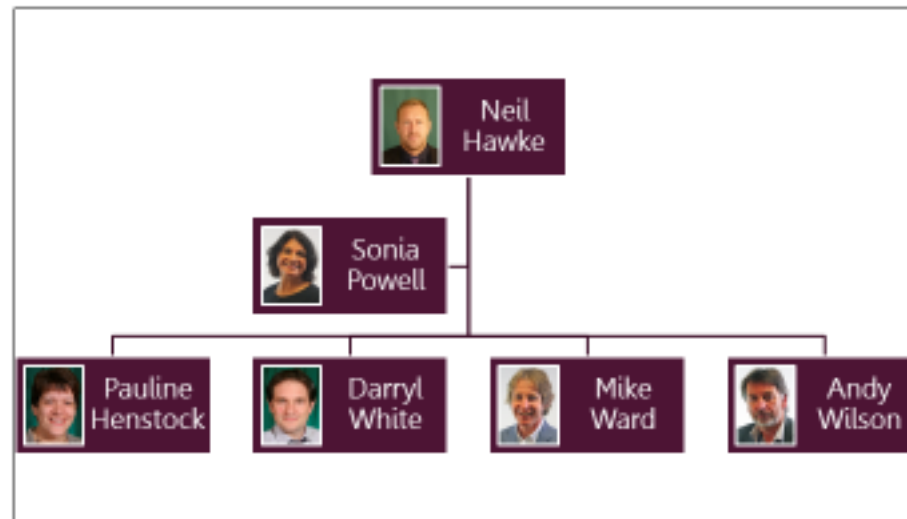*Appendix C: Suggested Crisis Management Response Structure*
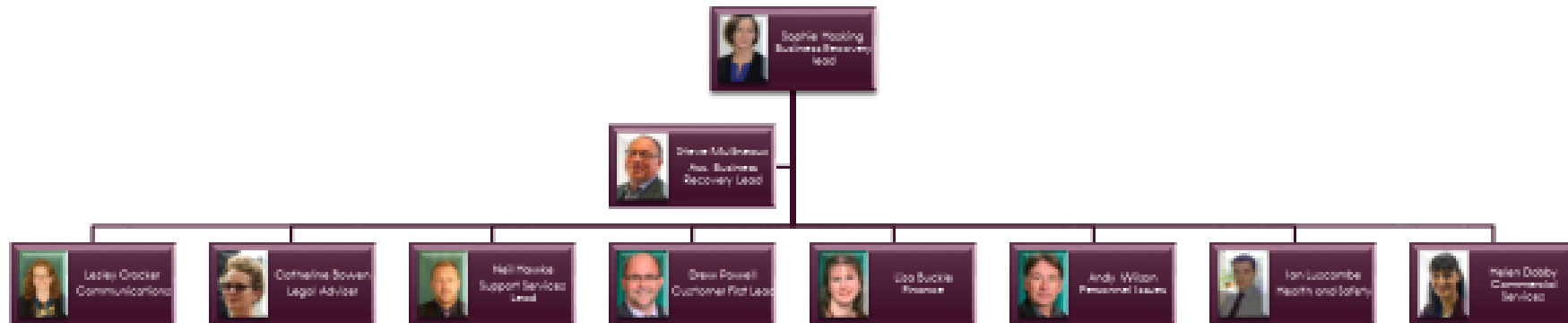
BUSINESS CONTINUITY COMMAND AND CONTROL GROUPS (TACTICAL)

Customer First

Support Services

BUSINESS CONTINUITY COMMAND AND CONTROL GROUPS

Commercial Services

Helen Dobby

Cathy Aubertin

Sarah Moody

Appendix D: Template agenda for Crisis Management Team Meeting

Business Continuity Agenda

Teleconference @

Via Skype or

Agenda BC meeting 3

1	Situation report from all attendees
2	Urgent impacts and agreed actions. Janice to collate responses from ELT
3	Communications: a. Communities / individual clients b. Staff c. Members d. Suppliers/partners e. Media (if applicable)
4	Agree recovery targets, actions and management responsibility for: a. Staffing issues including health, safety, welfare and rotas b. Buildings including relocation and repair c. Equipment d. ICT 4. Documents f. Other resources/stock
5	Authorisation of expenditure
6	Any requests for assistance by/to third parties
7	Any other business
8	Next meeting – date, time and location and attendance