

Update on Business Continuity Management System (BCMS) for Essex Clinical Commissioning Groups – December 2105/January 2016

1. Introduction

The Emergency Planning Team is in the process of implementing a Business Continuity Management System (BCMS) across all Essex Clinical Commissioning Groups. The BCMS will ensure effective and robust arrangements are in place to respond to disruptive incidents in line with:

- International Standard ISO22301 Business Continuity Management Systems;
- Business Continuity Institute Good Practice Guidelines 2013; and
- NHS England Business Continuity Management Framework 2015

The Business Continuity Management System will be supported by the following documentation:

- Business Continuity Management System and Policy
- Business Impact Analysis
- CCG specific Business Continuity Plan (BCP)
- Business Continuity Training programme
- Business Continuity Testing and Exercising Programme
- Business Continuity Plan and BIA Review Schedule
- Business Continuity Audit Programme
- Business Continuity Management Review Programme

The Business Continuity Management System and Policy and the CCG Specific Business Continuity Plan (BCP) are complete and waiting approval by the CCGs Executive Board/Governing Bodies. The Business impact analyses are complete and have been used to populate the BCP. These are kept by the heads of service. In an incident they will be used to provide further information on the service.

The remaining documents are in the process of being written and will be populated and submitted to the CCGs Executive Board/Governing Bodies once the BCP has been approved.

The purpose of this paper is to update CCG Boards/Governing Bodies on the progress of the BCMS and arrangements and to seek approval of the Business Continuity Management System and Policy and the CCG Specific Business Continuity Plan (BCP).

2. Document Update

This section provides an overview of the progress of each key document.

Business Continuity Management System (BCMS) and Policy

The Civil Contingencies Act 2004 and the NHS England Emergency Planning Framework 2015 requires the CCG to have a Business Continuity Management System and Policy to ensure that, in

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the event of significant service interruption, critical day to day functions can be maintained whilst timely recovery and restoration of key services, systems and processes is also achieved. The Essex Clinical Commissioning Groups BCMS and Policy sets out the principles and framework for the creation and revision of a BCMS and Business Continuity Plans relevant to the business activities of a Clinical Commissioning Group.

This document is in final draft and awaiting approval.

Business Impact Analysis (BIA) Process and Template

The Business Impact Analysis is the foundation of Business Continuity Management. The BIA looks at products and services that an organisation delivers and the activities and dependencies that underpin those deliveries. For each product or service, the purpose of a BIA is to:

- document the impacts over time that would result from loss or disruption;
- identify the maximum tolerable period of disruption and recovery time objective
- determine the priorities for recovery; and
- identify the dependencies and resources (both internal and external) that are required to achieve agreed service levels.

The BIA process has been completed and the information and data collected from each CCG directorate has been populated into the CCGs Business Continuity Plan into a prioritised list of activities using Red, Amber and Green ratings.

The BIA's will be required to be reviewed annually and as and when there are changes to the operations and or services.

Clinical Commissioning Group Business Continuity Plan

Each CCG has their own Business Continuity Plan following on from completion of the BIA process.

The aim of the Business Continuity Plan is to in the event of a business continuity disruptive incident outline the response and recovery arrangements to facilitate the resumption and restoration of activities and to mitigate the impacts of a business disruption on operations and reputation.

There are certain areas of the plan which are still in development as the Emergency Planning Team (EPT) are awaiting information and decisions from some of our key partners, these areas are highlighted in yellow in the plan. Some of this information may not be instantaneous and these information gaps have been acknowledged in the risk section supported by an action plan (annex a) until the information can be sourced and some decisions made. These issues will not delay the plan going for approval; these are complex areas of work which the EPT will continue to work on before and after approval of the plan.

The action plan (annex a) has been developed to further improve the plan over the coming year.

Business Continuity Training Programme

Business Continuity training is covered in the EPRR mandatory training programme sent to new starters and reviewed bi-annually. Business Continuity Training is also covered in more depth for On-

Call directors, this training is rolled out monthly at a nominated CCG location to new and existing directors. The mandatory training for staff is currently under review and will change to incorporate the New NHS England EPRR Framework 2015 and will have a greater focus on BC than previously.

The Emergency Planning team will be available to attend team meetings to support heads of service to educate their staff on BC.

Business Continuity Testing and Exercise Programme

The testing and exercise programme is still in development and will be confirmed once all Essex CCG Business Continuity Plans have been approved.

The planned testing and exercise programme is required to ensure that all aspects of the response to an incident have been exercised, in particular:

- All information in plan is verified
- All plans are rehearsed
- All relevant personal (including deputies) are exercised

The Clinical Commissioning Groups Business Continuity Plan may be tested and exercised through multi-agency exercises such as Essex Resilience Forum, Local Health Resilience Partnership and Partners exercises, the type of exercise will be reflected in the programme.

All exercise will undertake a full debrief and identification of lessons learnt and best practice. A debrief report will be produced for all exercises and an action plan for improvement implemented.

Business Continuity Management Review

The business continuity management review programme is the process by which Essex CCGs will undertake annual review of and continual improvement to the BCMS.

Annually in quarter 2 the Head of Emergency planning will undertake a full EPRR and Business continuity management review including a full review against the EPRR national standards in conjunction with NHS England. The Head of Emergency planning will produce an annual report.

The purpose of the review is to ensure the effectiveness and management of BCMS and to set the Emergency Planning Work Plan for the coming financial year.

The annual report, summarising the findings of the review will be shared with NHS England and the Local Health Resilience Partnership as evidence of continual improvement.

In addition the Head of Emergency planning will meet as a minimum 6 monthly (Q1 and Q3) with the CCGs Emergency Accountable Planning Officers to discuss BCM.

The emergency planning team will provide information to internal/external audit in relation to the business continuity functions as required.

Business Continuity Audit Programme

The Business Continuity Management system will be audited in line with the CCG's Audit Plan, once the CCGs Business Continuity Plan has been approved. The period between audits will not exceed two years and this timescale will be factored into the CCGs Audit Plan. The Audit process will include:

- Defining the audit scope
- Defining the audit approach
- Reviewing the information gathered by the BCM activities
- Identifying gaps in the content and level of information gathered
- Obtaining and comparing relevant documentation, such as, BIA's
- Reference secondary sources such as, guidance, standards and legislation
- Providing a draft audit report for discussion
- Providing an agreed audit report incorporating recommendations
- Providing an agreed remedial action plan, including timescales
- Providing a monitoring process to ensure the action plan is implemented

The Emergency Planning Team will undertake a self-assessment of the BCMS annually with each Essex CCG utilising the NHS England Core Standards and ISO22301 Business Continuity Self-Assessment Tool. The outcomes from the self-assessment will be produced in a report and submitted as per the governance process

**Report Written by Maxine Hazle CCG Emergency Support Officer and Jackie King CCG Head of
Emergency Planning
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Annex A - Business Continuity System - Improvement Action Plan			
	Completed		
	In progress		
	Delayed		
Objective	Details of Task	Officer Responsible	Comments / Updates
Agree the sharing of resources between CCGs that will assist a CCG to maintain its critical functions following a disaster relating to the loss of :- <ul style="list-style-type: none"> Premises (temporary only) key Staff IT (loss of Hardware, loss of IT capability at a CCG site) 	Complete a memorandum of understanding that details how CCGs will share the following to ensure maintenance of a affected CCGs critical functions <ul style="list-style-type: none"> Premises (temporary) Staff IT (hardware) 	JK	Memorandum of understanding in development CCGs have premises hot desk arrangements in place these could be expanded upon in a disaster. NELCSU have completed a proposal for the replacement of IT equipment in an emergency The head of emergency planning will be writing an emergency IT provision options paper outlining all the CCG options this is to be considered by all the AOs for decision
CCGs to understand the provision set out in their CCG leases for permanent premises relocation if required following a disaster	Head of Emergency Planning to work with NHS Property services to determine provision for relocation on a permanent basis following a disaster if required e.g. Fire	JK	Awaiting a response from NHS Property Services who are checking all the CCG lease agreements
Devise a method of contacting staff in an emergency both in and out of hours	Develop staff contact lists from each CCG to be stored on Resilience Direct.	JK	Mid Essex staff list is complete NE Essex – ACE completing Awaiting responses from NELCSU in regard to the other CCG staff lists, meeting planned for the 12 th January to discuss

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Obtain suppliers / contractors list for each CCG	Work with contract Heads regarding list of suppliers held by each CCG to support Business Continuity Strategies. (Including collective work arrangements with Essex CCGs)	MH	Emailed and awaiting replies. Mid Essex CCG complete
Ensure the setup of Paper Back-up Systems as required	Services to identify paper back-up systems if ICT is lost	MH	To be commenced
To be clear with NEL CSU how IT provision would be regained and in what timeframe following in a NELCSU IT disaster	NEL to complete and share their IT disaster BC plan	JK	Awaited from NELCSU
To work with NEL CSU in regard to out of hours IT provision	Continue on-going discussions with NEL CSU	JK	NEL CSU Service Desk in Essex is now open from 07:00-19:00, Monday to Friday. They are intending to move to a 24/7 model using a phased approach and extending the opening times by one hour at both ends of the working day so this is the first of these phases.
Develop IT hardware assets register	Check with NELCSU re availability of assets register for hardware, to support BC ICT strategy	JK	Awaiting response from NELCSU Mid Essex CCG undertaking a internal hardware audit
Determine Business Continuity Audit Dates for each CCG	Future external BC audits to be communicated to the Emergency Planning Team to ensure it is built into the audit schedule. EPT will devise own audit schedule to incorporate annual self – assessment audits.	MH	Schedule to be devised in line with completion of BCPs
Develop a master EP Risk Register which feeds into CCG corporate risk registers as required	Develop and maintain a master EP Risk Register, incorporating all local CCG EPRR and BC risks. Ensure risks are incorporated into CCG cooperate risk registers as required.	JK	To be commenced
Develop BC folders on Resilience Direct	Set up BC folders on RD - specific folders for each CCG, containing all required BC documentation for Directors on-call.	MH/JK	In progress