



BUSINESS CONTINUITY MANAGEMENT

ACTION PLAN

**Proposals to Meet the Business Continuity Management Duty Requirements
of the Civil Contingencies Act 2004**

*Prepared on behalf of Wear Valley District Council by the County Durham and Darlington
Emergency Planning Unit*

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Introduction:

The 'Civil Contingencies Act' 2004 (CCA) requires local authorities (and other Category 1 responders*) to demonstrate a variety of Civil Protection duties in order to increase resilience and improve effectiveness in response to an emergency situation. (Full copy of the Act and Guidance can be seen at www.ukresilience.info/ccact/index.htm)

An 'emergency' is defined in Part 1 of the Act as:

“An event or situation which threatens serious damage to human welfare in a place in the UK, the environment of a place in the UK, or war or terrorism which threatens serious damage to the security of the UK”.

One of the main objectives of the Act is to establish a consistent level of civil protection activity across the UK.

The Business Continuity Management duty within the CCA supports emergency planning and risk assessment duties. The duty is also dependant upon the other civil protection duties including information sharing and co-operation with partner organisations.

The purpose of this Plan initially produced by the County Durham and Darlington Emergency Planning Unit (EPU) and agreed by the Business Continuity Management Working Group (BCPWG) and subsequently the Management Team, is to outline a number of proposals to consolidate and strengthen upon the performance of Business Continuity Management within Wear Valley District Council in order to comply with the November 1st 2005 deadline and meet the requirements of the CCA. It is further suggested that all nine local authorities in County Durham and Darlington adopt a joint local authority approach so that a degree of consistency is achieved and monitoring and auditing of the duty can be effectively attained by the EPU in conjunction with the Local Resilience Forum (LRF). This Plan focuses upon implications in fulfilling the Business Continuity Management duty and not the duty imposed upon local authorities to promote Business Continuity to local businesses and voluntary organisations. The promotion aspect of the Act will be the second phase of the Business Continuity Management duty as it is the only part of the Act which has been given an extension period of six months i.e. a legal requirement by April 2006.

* See Appendix 1

Wear Valley District Council Business Continuity Management Proposals

The following pages contain details of proposals from the Business Continuity Management (BCM) Working Group to be considered by the Management Team of Wear Valley District Council. Written comments are to be forwarded to the Chair of the Business Continuity Management Working Group.

The proposals outlined within this document are based upon the BCM requirements within the CCA and 'Preparing for Emergencies' draft guidance document, the Business Continuity Institute's (BCI) Good Practice Guidelines* and the British Standard Institute's Publicly Available Specification 56 (PAS 56)#.

At this present time, Business Continuity Management is performed at different levels within each local authority within County Durham and Darlington. Some or parts of the proposals contained within this document may have already been adopted by some of the authorities. The BCM Working Group proposes that the Management Team accepts the proposals incorporated in this document so that a BCM Policy Document and BCM Programme can be produced in order for arrangements to be accurately documented and formalised.

* details can be seen at www.thebci.org/GPGMain.html

details can be seen at www.thebci.org/PAS56.html

Proposal 1 – Appointment of Local Authority Business Continuity Liaison Officer (LABCLO)

The BCM Working Group is required to identify a Liaison Officer who will have overall responsibility for Business Continuity Management (BCM) activities within the authority.

The Local Authority Business Continuity Liaison Officer (LABCLO) should not be the same person who is identified as being the Emergency Planning Liaison Officer for the authority, although it is recognised that for some authorities this may not be possible due to the size and structure of the organisation. It is the responsibility of Wear Valley District Council to determine who is most appropriate for the LABCLO role. It is proposed that this person has an understanding of risk management activities within the authority.

The main rationale for the above proposal is to ensure that each local authority within County Durham and Darlington is continuously committed to the BCM duty and that full ownership of the processes involved is achieved. It is further recommended that LABCLOs have this role written into existing job descriptions to ensure that appropriate time is given to BCM duties.

Note:

It has been already agreed by the BCM Working Group that the Director of Central Resources is designated as the LABCLO for the Council.

Proposal 2 - Roles and Responsibilities of the LABCLO

The BCM Working Group proposes that the following roles and responsibilities should be accepted and assumed by the LABCLO.

- To be the main contact between the County Durham & Darlington Emergency Planning Unit and Wear Valley District Council for all BCM issues.
- To drive BCM throughout the local authority.
- To ensure that the Management Team & Members of the Council are consulted and kept informed at all stages throughout the BCM process.
- To establish and maintain a local authority BCM Working Group.
- To disseminate information and minutes to the BCM Working Group, Management Team and Members of the Council.
- To identify from other working groups risks and threats that may impact upon BCM processes and plans.
- To identify any training needs of key personnel.
- To attend joint local authority Business Continuity Management working group meetings that may be established for the purpose of sharing good practice with other Category One responders.

Proposal 3 – Establishment of a Business Continuity Management Working Group

The Local Authority agrees to establish a Business Continuity Management Working Group who will manage BCM process.

It is a requirement that each BCM Group has *as a minimum*, one representative from each department. This will ensure that BCM encompasses all critical activities within the local authority.

The Local Authority accepts that a lead and a suitable deputy group member is identified by the LABCLO to ensure that each department is represented at all meetings. Should the department representative be unavailable to attend a meeting, s/he will nominate a substitute to attend on their behalf. It is further recommended that each BCM Working Party member (and deputy member) have this duty reflected in their job descriptions to ensure continual commitment and support for the BCM process.

Note:

A BCM Working Group has already been identified for the purpose of producing a Business Continuity Plan for the Civic Centre. Current membership of this group can be seen at Appendix 2.

Proposal 4 - Terms of Reference of the BCM Working Group

The Local Authority agrees the following roles and responsibilities to be accepted by each BCM Working Group member.

- To assist the LABCLO and the County Durham & Darlington Emergency Planning Unit in ensuring the Council fully supports the BCM duties of the Civil Contingencies Act.
- To develop and maintain effective and robust arrangements to ensure that the Council can continue to exercise its Civil Protection functions in the event of an emergency.
- To develop and maintain effective and robust arrangements to ensure that the Council can continue to perform its ordinary functions in the event of an emergency.
- To develop and maintain a BCM Programme and Policy.
- To ensure that the BCM Programme encompasses all mission critical activities of the Council.
- To discuss and propose procedures for ensuring service providers have Business Continuity Plans and BCM arrangements in place.
- To discuss and propose that BCM becomes an integral part of all local authority work and consider proposing that it becomes integrated into Service Plans.
- To discuss any concerns in respect of BCM.
- To consider implications of the Local Resilience Forum Community Risk Register and identify any changes needed to BCM procedures and plans within the Council.
- To consider implications of any joint working with other local responders to share information and good practice.
- To ensure arrangements are in place for the testing and exercising of Business Continuity Plans.
- To ensure that a training programme for key personnel is devised and delivered
- To ensure that Business Continuity Plans are effectively monitored, reviewed and kept up to date.
- To discuss and propose procedures for the provision of Business Continuity information to be made available to the public, local businesses and voluntary organisations.

Proposal 5 – Chairing of the BCM Working Group

The Local Authority agrees that the BCM Working Group is chaired by the LABCLO with support from Susan Williams (Emergency Planning Officer) who is responsible for the Council's Emergency and Business Continuity Planning.

Proposal 6 – Roles and Responsibilities of BCM Working Group Members

The Local Authority agrees that BCM Working Group members should accept the following roles and responsibilities.

- To ensure department attendance at every BCM Working Group meeting.
- To assist the LABCLO in driving the BCM process.
- To represent their department and provide knowledge / expertise for the group.
- To actively participate in group discussions, exercises and workshops for the purpose of BCM.
- To identify any departmental risks that may have an impact on BCM plans and procedures and bring them to the attention of the BCM Working Group.
- To suggest items for consideration at future meetings.
- To discuss local authority BCM plans, policy and procedures and identify areas of improvement.
- To provide Business Impact Analysis information and other information needed for the production of Business Continuity Plans.
- To ensure that each Departmental Service Plan contains reference to BCM and that this is progressed throughout their respective departments.

It is further agreed that each BCM Working Group member (and deputy member) have this duty reflected in their job descriptions to ensure continual commitment and support for the BCM process.

Proposal 7 - Identification of Internal and External Dependencies

In addition to the services that local authorities provide themselves the CCA states that Category One responders have a duty to ensure that the services they are not directly responsible for (e.g. those that are contracted-out or underpin service provision) can continue to be delivered. It is therefore necessary for local authorities to look at their internal and external dependencies and ensure their suppliers / contractors also have contingency arrangements in place.

Page 88 of the CCA Guidance states *“local responders also have an interest in ensuring that their suppliers and contractors have in place robust BCM arrangements”* suggesting that organisations should *“build BCM into procurement and contract management processes”*. Further stating that *“The Office of Government Commerce provides detailed advice on these issues which is freely available on its website: www.ogc.gov.uk”*.

The Local Authority accepts that:

- All Business Impact Analysis processes to include the identification of all departments' internal and external dependencies.
- The BCM Working Group investigates the impact of a disruption preventing the continuation of a service that a department is dependent upon for its continued functioning.
- The BCM Working Group investigates Business Continuity arrangements of external suppliers. Consideration should be given to priorities i.e. initially ensuring that any suppliers who support the critical functions of the local authority have BCM arrangements in place.
- Statements are written into BCM Policies and/or procedures that may be produced
- Consider the development of procedures to build BCM into contractual arrangements.

Proposal 8 – Identification of Front line Services

The CCA requires local responders to put in place arrangements to ensure that they continue to exercise their functions in the event of an emergency “*in so far as is reasonably practicable*”. Page 76 of the Guidance document identifies criticality as being an essential factor in determining which functions to focus upon and proceeds to list a number of useful indicators including impact on human welfare, the environment and security, emergency management / civil protection functions and an acceptable level of ordinary service during an emergency response.

The Local Authority agrees that the BCM Working Group should:

- Revisit Business Continuity Plans (whether in draft or published form) and assess whether key front line services (e.g. emergency response, human welfare, security of the community and its environment) have been identified as being Class One, Two, or Three functions*.
- Identify and cross reference functions classed as critical according to the CCA, i.e. those that are critical services performed on a day to day basis, and those that are critical services for responding to emergency situations and revise Business Continuity Plans to ensure that these services are mentioned. This could be achieved by revising the Council's Generic Emergency Plan to identify services that would be crucial during response to an emergency, e.g. emergency repairs or accommodation.
- Seek advice and assistance from the EPU in updating Business Continuity Plans to include front line services within their recovery priorities.
- Seek advice and assistance from the EPU in identifying internal and external suppliers that support critical functions
- The Council investigates these critical suppliers to ensure that they have robust BCM arrangements in place.

It is very likely that services identified to be critical for emergency response purposes will be regarded as Class One functions for the purpose of Business Continuity Plans. The above process will ensure that both Emergency Planning and Business Continuity Planning are not performed in isolation but that each one has regard for the other and that plans and procedures integrate.

* See appendix 3 for definitions

In order for the above to remain integrated, it is essential that any relevant changes made to either Emergency or Business Continuity Plans are reflected in both plans and therefore incorporated into amendment procedures.

Proposal 9 - BCM Policy

The BCI Good Practice Guide (to which the CCA Guidance document supports) emphasises the need for a BCM Policy to be written and signed off by top management within the organisation.

Having such a Policy in place will re-enforce the need for BCM within the local authority and help achieve the support needed from Chief Officers.

Success of having a robust BCM Policy within the organisation not only depends upon support from top management but education and awareness of both internal and external stakeholders.

The Local Authority agrees that the following be accepted:

- The EPU will assist the Council's BCM Working Group in the development of a BCM Policy Statement
- The BCM Policy Statement to be signed by Management Team and Members.
- The BCM Working Group to discuss and propose ways in which the BCM Policy Statement is communicated effectively throughout the organisation.

Proposal 10 - BCM Programme

In order for BCM to be successful, it will be essential that a BCM Programme is effectively managed. The introduction of the CCA and the development of the BCI PAS 56 further emphasises the need for organisations to have a clearly documented BCM Programme in place. It is envisaged that findings from Business Impact Analysis and Risk Assessments will be combined to produce a programme of events identifying priorities and work schedules to be included within the BCM Programme.

The Local Authority accepts that the BCM Working Group should:

- Seek assistance from the EPU in the development and maintenance of a BCM Programme.
- Document the BCM Programme and seek acceptance by the Management Team and Members.
- Link the BCM Programme to other Policies or Statements of Purpose as considered necessary by Council's BCM Working Group.
- Continuously monitor and update the BCM Programme at least annually.
- Widely communicate the BCM Programme throughout the Council.

Proposal 11 - BCM Management Information System (MIS)

The BCM process is a process in need of support not only at the start of the BCM project but continuously throughout each of the stages of the BCM life cycle. It is therefore important that Management Team are supportive at each stage within the process. Effective communications between the LABCLO, the BCM Working Group, and Management Team is also needed to ensure a continuous strategic level of support for the BCM process.

The BCM Working Group agrees to develop a Management Information System (MIS) as part of their BCM Programme. The MIS will outline the communication strategy that is adopted to ensure that the Management Team (and other personnel as considered necessary) are consulted throughout the BCM Programme. The MIS should also have regard for communication links that may be established to ensure critical information about local risks and risk registers are reported to and considered by the BCM Working Group.

Proposal 12 - BCM Information to the Public

The CCA requires Category One responders to publish aspects of their Business Continuity Plans in “so far as this is necessary or desirable for the purposes of dealing with emergencies”. The Guidance expands upon this requirement, proposing that Category 1 responders “make information available to the public about what will happen in the event of an emergency”. Information to the Public can be provided by a variety of means including websites, leaflets, awareness raising training, national and regional publications etc. This public awareness duty is also required for emergency planning purposes and there is a need for a consistent approach to this issue. The above duty will also be subject to EPU approaches for the purpose of dealing with information requests in accordance with the CCA and the ‘Freedom of Information Act’.

The Local Authority accepts that:

- The EPU should devise generic templates for the purpose of information made available to the public.
- The EPU should devise templates for the purpose of responding to requests for information for use within the EPU and for local authorities. Information to the Public templates to be discussed at the new Local Authority Civil Contingencies Group – for agreement to type of information, content, format and delivery. This will give a consistent approach to Emergency Planning and Business Continuity Planning throughout County Durham and Darlington.
- The EPU should use templates internally within the Unit and update the intranet with relevant information, providing links to local authority and other websites as considered appropriate.
- The EPU should develop its own website to act as a key local authority source of providing amongst other things, information to the public

Proposal 13 - Risk Assessment

The CCA requires Category One responders to identify and assess significant risks of an emergency occurring in their area, in accordance with their particular functions, as a basis for performing their other civil protection duties. This Risk Assessment duty applies to Emergency Planning and Business Continuity functions since local responders also need to ensure that their systems and processes are resilient to a range of internal risks. Page 83 of the Guidance document states that *“the development of Community Risk Registers will mean that local responders will have access to up-to-date information about risks in their area”*. It will therefore be essential that this information is considered by Emergency Planning and Business Continuity Planning groups within the local authorities in addition to any internal risk assessments that local authorities perform.

The Local Authority acknowledges that:

- LABCLOs should receive copies of the Community Risk Register and any amendments so that s/he can identify (with EPU support and guidance) any implications on BCM procedures and plans
- Identification of additional local risks to be fed through the Council’s pre-identified MIS (BCM Working Group to Management Team) and fed into the Local Resilience Forum for information

Proposal 14 - BCM Implementation Plans

In order to ensure that local authorities comply with the BCM duty imposed by the CCA, implementation plans need to be developed.

The BCM Working Group recommends that:

- Based upon the proposals included in this Plan, Emergency Planning Officers should produce a matrix or Gantt chart identifying actions and timescales from the immediate period until November 2005 when Category One responders should be able to demonstrate that they are complying with the BCM duty of the CCA.
- Implementation plans be agreed by the Management Team and put into action by the Council's BCM Working Group.

Proposal 15 – BCM Training and Testing Templates

The Act specifies that key staff need to be trained and that a training programme should cover issues such as plan contents, roles and key skills and knowledge required during activation of the plan.

Other guidance documents (e.g. PAS 56, Continuity Forum, BCI Good Practice Guidelines) indicate that training and awareness raising of BCP should be filtered throughout the organisation and be provided to new and existing staff. Demonstration of a variety of exercise types should be clearly documented in an exercise cycle. The guidance document makes reference to the PAS 56 and the five stages involved in BCM life cycle from the BCI guidelines. It specifically mentions that at stage four (building and embedding a BCM Culture) the success of a BCM strategy will depend upon effective education and awareness programmes for both internal and external stakeholders (e.g. employees and suppliers).

The Management Team accepts that:

- The EPU produces templates for training and testing programmes for the purpose of BCM to be used and adapted as necessary for each of the nine local authorities.
- The EPU identifies and considers coordinating training and testing for BCM with training and testing for Emergency Planning purposes wherever possible.
- The EPU to produce a process (and templates) for identifying lessons learnt from training, testing and response to activation of plans so that accurate documentation can form part of the audit trail for Business Continuity and Emergency Planning duties.

By agreeing to the above actions the Management Team will ensure that there is a consistent approach to training and testing of BCM and Emergency Planning.

Proposal 16 - BCM Audit Programme

The CCA Guidance document highlights the importance of maintenance and auditing of BCM (and also Emergency Planning) duties. It will be essential that local authorities can demonstrate that they are performing their duties outlined in the Act. An audit checklist could be based around information held within the Continuity Forum's Benchmarking Assessment Tool* and at Annex 7D of the CCA Guidance (Page 205).

The Management Team accepts that:

- The EPU should develop BCM audit templates to be performed by the Council annually.
- The EPU should develop a BCM review process so that results from BCM audits are communicated to all key BCM personnel.
- The EPU should develop similar audit templates and review processes for Emergency Planning activities in order to dovetail with BCM audit procedures.
- All audits to be performed at the beginning of each financial year (as a minimum) and incorporated into the Council's Emergency Planning and BCM events schedules.
- Results of audits to be forwarded to the EPU's Senior Emergency Planning Officer (Business Continuity) and Senior Emergency Planning Officer (Emergency Plans) for gap analysis and provision of advice and assistance to local authorities as considered necessary.

* Continuity Forum Benchmarking Tool can be accessed from www.continuityforum.org/node/64

Proposal 17 - BCM Mutual Aid

Mutual aid agreements currently exist between all nine local authorities within County Durham and Darlington for the purpose of Emergency Planning. With the increase in threat of terrorist activity, an emergency may occur that not only activates more than one Emergency Plan but also the Business Continuity Plans of the local authorities within Durham and Darlington. Such an event will therefore have serious resource implications on the local authorities.

The Management Team agrees that:

- The EPU's Chief Emergency Planning Officer recommends at LRF that mutual aid agreements between local authorities in County Durham and Darlington are extended to emergencies requiring the activation of Business Continuity Plans.

The Way Forward:

Following acceptance of proposals contained in this document by Management Team Susan Williams will:

- Produce a summary report identifying actions to be taken in order to carry each of the proposals forward.
- Produce a BCM implementation plan for approval of the Council
- Arrange a meeting with the LABCLO as identified by the BCM Working Group to discuss draft implementation plan
- Arrange a meeting of the BCM Working Group to discuss and carry forward the BCM implementation plan

Appendix 1

Local Arrangements for Civil Protection

The Civil Contingencies Act provides a statutory framework for civil protection at a local level and places duties upon local responders to ensure that they are prepared to deal effectively with an emergency situation.

The Act divides local responders into two Categories – Category One and Category Two. Category One responders have duties placed upon them to:

- Assess local risks
- Put in place emergency plans
- Put in place business continuity management arrangements
- Put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency
- Share information with other local responders to enhance co-ordination
- Co-operate with other local responders to enhance co-ordination and efficiency
- Provide advice and assistance to businesses and voluntary organisations about business continuity management (Local authorities only – extended compliance to April 2006)

Category Two responders are placed under lesser duties of co-operating with Category One organisations and sharing relevant information. A table showing Category One and Two responders can be seen below.

Category 1	Category 2
<ul style="list-style-type: none"> ▪ Local Authorities ▪ Police ▪ Fire ▪ Ambulance & Health ▪ Environment Agency ▪ The Secretary of State 	<ul style="list-style-type: none"> ▪ Utilities - Electricity, Gas, Water & Sewerage, Public Communications providers ▪ Transport – Railway, Airport and Ferry Operators ▪ Harbours and Ports ▪ Health & Safety Executive

Appendix 2

BCM Working Group Representatives

Department	Lead	Deputy
Central Resources		
Housing Services		
Community Services		
Regeneration		

Appendix 3

Classification of Functions

The following recovery timescales have been identified for the Wear Valley District Council Business Continuity Planning process:

Definition of Class One Function:

An essential function needing to be restored within 0-24 hours.

Definition of Class Two Function:

An important function needing to be restored within 3 days.

Definition of Class Three Function:

Function needing to be restored within 14 days.