

South Lincolnshire NHS Clinical Commissioning Group Business Continuity Policy

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**NHS South Lincolnshire Clinical Commissioning Group
Business Continuity Policy & Procedure Version Control
Sheet**

Version	Section/Para/ Appendix	Version/Description of Amendments	Date	Author/Amended
1		Original version adapted from GEM document		
2		Amended for the CCG	March 2014	Jules Ellis-Fenwick
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NHS South Clinical Commissioning Group Business Continuity Management Policy & Procedure Policy Statement

Background	<p>The purpose of this policy is to set out the process that provides the framework to ensure the resilience of organisations to any eventuality, to help ensure continuity of service to key users and patients and the protection of the NHS brand and reputation.</p>
Statement	<p>The aim of the policy is to provide clear guidance to support business continuity management and provides a basis for planning to ensure long-term survivability following a disruptive event.</p>
Responsibilities	<p>Business Continuity Management is integral to the way NHS South Lincolnshire CCG performs its day-to-day business. All staff are required to ensure that the policy is adhered to.</p> <p>There are many and varied possible causes of service disruption and as a general guide, Business Continuity Management must be carried out to minimise the effects of a number of potentially disruptive events, for example:-</p> <ul style="list-style-type: none">• Major accident/incident, national disaster, road closures, epidemic, terrorist attack, theft.• Utility/service outages i.e. loss of water including IT hardware failure, software viruses, network outages, telephone systems, supply discontinuation.• Fire, flood, extreme weather conditions.• Major disruption to staffing i.e. as a result of an epidemic, industrial action, inability to recruit/mass resignations.
Training	<p>Business Continuity Management training is a statutory requirement placed on the NHS under the UK CCA 2004.</p> <p>CCG Executive officers to identify key leads to support Business Continuity Management who will be trained in Business Continuity Management and who will support their staff/team in Business Continuity Management.</p> <p>Business Continuity management training is a statutory requirement placed on the NHS under the UK CCA 2004.</p>
Dissemination	<p>The policy will be disseminated to all staff via the CCG intranet and via email and will be available on the CCG website.</p>
Resource implication	<p>The policy has been developed in line with the Department of Health core standards that all NHS organisations must follow set out in the NHS Commissioning Board Business Continuity Management Framework (January 2013). The standards are a minimum and also apply to subcontracts and partnership arrangements.</p>

1. Introduction

The Civil Contingencies Act 2004 came into force in November 2005 and focuses on local arrangements for civil protection, establishing a statutory framework of roles and responsibilities for local responders such as Clinical Commissioning Groups (CCGs) as Category 2 responders. It is a requirement of the Act that the CCGs have Business Plans in place to support the CCG Emergency Plan.

South Lincolnshire CCG as a 'category two' responder within the Civil Contingencies Act (2004) is required to:

- co-operate with other responders
- share information

Each NHS organisation is responsible for making sure it meets the legal requirements and core standards for business continuity set out in NHS Commissioning Board Business Continuity Management Framework 2013. This responsibility extends to services provided through partnerships or other forms of contractual arrangement.

2. Purpose

- 2.1 The role of South Lincolnshire NHS Clinical Commissioning Group is to commission healthcare, both directly and indirectly, so that valuable public resources secure the best possible outcomes for patients. The Business Continuity policy is important because it will help the CCG make sure that it can continue to deliver its business on behalf of patients in times of disruption.
- 2.2 South Lincolnshire CCG recognises the potential operational and financial losses associated with a major service interruption, and the importance of maintaining viable recovery strategies.
- 2.3 This policy statement is intended to provide a framework for South Lincolnshire CCG to follow in the event of an incident such as fire, flood, bomb or terrorist attack, power and/or communication failure or any other emergency that may impact upon the daily operations. It describes the proposed policy for implementing and maintaining a suitable business continuity process within the CCG, including the roles and responsibilities of the officers with the responsibility for implementing it.

The aim of the policy is to provide clear guidance to support Business Continuity Management and provide a basis for planning to ensure long-term survivability following a disruptive event.

The Business Continuity Management policy is separate from, but may operate alongside the organisation's Business Continuity Plan, Major Incident Plan, Influenza Pandemic Plan and the Stamford and Peterborough Hospitals Business Continuity Plan.

- 2.4 The NHS England Core Standards for EPRR, ISO 22301 supported by ISO 22313 and PAS2015 outlines the requirements for business continuity management.
- 2.5 The CCG Business Continuity Manager with support from the GEM Business Continuity Team will develop a business continuity management infrastructure that meets the requirements of the ISO 22301 and ISO (PAS) 22399. The Business Continuity Plan (BCP) will be designed to meet the requirements of this standard.

2.6 The BCP should include the following:

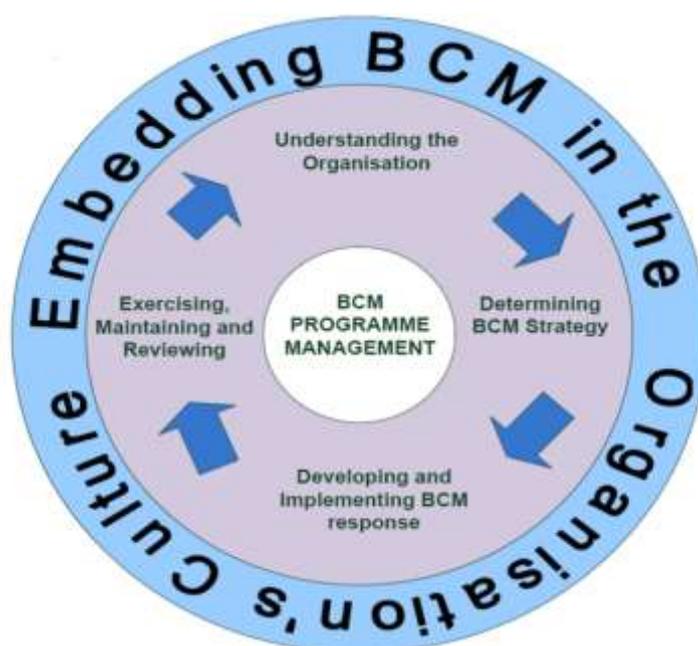
- risk assessments and business impact analysis which identifies South Lincolnshire CCG's critical services;
- plans in place to recover South Lincolnshire CCG's critical services; and
- the support provided by South Lincolnshire CCG for incident response arrangements.

The list below provides examples of what might be considered an event to invoke a BCP. The list is not exhaustive and judgement will be applied in each case:

- loss of workplace short and long term;
- loss of information and communications technology infrastructure services for up to five days;
- loss of key staff short and long term
- significant national or international incident impacting on South Lincolnshire CCG, such as a pandemic; and
- any requirement as identified by the business impact analysis process;

3. Scope

- 3.1. This policy applies to those members of staff that are directly employed by South Lincolnshire CCG and for whom the CCG has legal responsibility. For those staff covered by a letter of authority/honorary contract or work experience the organisation's policies are also applicable whilst undertaking duties for or on behalf of South Lincolnshire CCG. Further, this policy applies to all third parties and others authorised to undertake work on behalf of the South Lincolnshire CCG.
- 3.2. This policy statement currently covers all locations currently occupied by South Lincolnshire CCG.
- 3.3. Separate supporting emergency preparedness, resilience and response plans will be developed to cover South Lincolnshire CCG response.



4. Accountability, responsibilities and training

- 4.1. In order for South Lincolnshire CCG to develop a good long-term business continuity capability, it is essential that all staff take on an appropriate level of responsibility.
- 4.2. Individual managers will be required to assess their specific area of expertise and plan actions for any necessary recovery phase, setting out procedures and staffing needs and specifying any equipment or technical resource which may be required in the recovery phase.
- 4.3. The Business Continuity Manager with support from the GEM Business Continuity Team will be responsible for change control, maintenance and testing of the plan.
- 4.4. The Chief Officer and Officers of South Lincolnshire CCG, and their appointed deputies, will hold two hard copies of the Business Continuity Plan (BCP) allocated to them. It is intended that one copy should be located at the holder's home address so it is easily accessible and the second in the BCP folder at their office base. The BCP folder will also contain recovery procedures, contacts, and lists of vital materials or instructions on how to obtain them.
- 4.5. The CCG Chief Officer and Officers are responsible for:
 - implementation of the business continuity policy and standards;
 - review of business continuity status and the application of the policy and standards in all business undertakings;
 - enforcing compliance through assurance activities;
 - provision of appropriate levels of resource and budget to achieve the required level of business continuity competence; and
 - ensuring information governance standards continue to be applied to data and information during an incident.
- 4.6. All other CCG staff are responsible for:
 - achieving an adequate level of general awareness regarding business continuity;
 - being aware of the contents of their own business area's business continuity plan and any specific role or responsibilities allocated;
 - participating actively in the business continuity programme where required; and
 - ensuring information governance standards continue to be applied to data and information during an incident.
- 4.7. South Lincolnshire CCG Business Continuity Incident Control Team (BC ICT) and Business Continuity Manager will be responsible for:
 - determining the criteria for implementing the BCP;
 - the overall management of a crisis, providing strategic direction and co-ordination of service recovery plans;
 - with support from the GEM Business Continuity Team will:
 - deliver training and awareness of the plan; and
 - maintain the plan.

5. Chief Officer

The Chief Officer has overall responsibility for the operational management and for ensuring that NHS South Lincolnshire CCG has robust arrangements for business continuity and service recovery in place.

6. Cascade process

- 6.1. The BC ICT will provide the immediate management functions required to handle an incident. A cascade structure will be developed to cascade key messages to essential personnel.

7. Risk analysis

- 7.1. South Lincolnshire CCG is not responsible for the direct provision of health services; however it is responsible for some functions that have a direct impact on providers of health services. Therefore the risks to stakeholders resulting from a large catastrophic incident affecting South Lincolnshire CCG could be significant.
- 7.2. Where there is an incident involving the IT infrastructure, the GEM IT Service Helpdesk should be informed of the affected service and obtain an initial assessment.
- 7.3. The CCG Business Continuity Manager with support from the GEM Business Continuity Manager will work with directorates to develop an asset list of locations, staff and services.
- 7.4. A series of robust plans and mitigation will be developed for the following priority incidents:
 - unavailability of premises for more than five working days caused by fire, flood or other incidents;
 - major electronic attacks or severe disruption to the IT network and systems;
 - terrorist attack or threat affecting transport networks or the office locations;
 - denial of access to key resources and assets;
 - significant numbers of staff prevented from reaching CCG premises, or getting home, due to bad weather or transport issues;
 - theft or criminal damage severely compromising the organisation's physical assets;
 - significant chemical contamination of the working environment;
 - serious injury to, or death of, staff whilst in the offices;
 - illness/epidemic striking the population and therefore affecting a significant number of staff;
 - outbreak of a serious disease or illness in the working environment;
 - simultaneous resignation or loss of a number of key staff;
 - widespread industrial action;
 - significant fraud, sabotage or other malicious acts; and
 - violent incidents affecting staff.

8. Incident notification

- 8.1. The CCG Business Continuity Manager with support from the GEM Business Continuity Manager will develop procedures for incident notification and communicate these to staff.

9. Incident analysis

- 9.1. The response to an emergency incident does not necessarily or automatically translate into the declaration of a disaster and the implementation of a full recovery operation.
- 9.2. Incidents may cause a temporary or partial interruption of activities with limited or no office damage. It will then be the responsibility of the CCG Business Continuity Manager, in conjunction with CCG Chief Officer and/or Officers as available, to evaluate and declare the appropriate level of response.
- 9.3. The CCG Business Continuity Manager (and CCG CO/ Officers as available) will decide if temporary premises or alternative long-term premises are eventually to be required and will manage the acquisition.
- 9.4. Severity of an incident will be identified as follows:
 - small;
 - medium;
 - large; and
 - catastrophic
- 9.5. The CCG Business Continuity Manager with support from the GEM Business Continuity Team will develop definitions that classify incidents in accordance with the level of downtime expected.
- 9.6. The severity level will indicate the urgency of recovering the business service, and also the order in which services should be reinstated.
- 9.7. In particular, immediately upon notification of an incident involving the IT infrastructure, the South Lincolnshire CCG should be made aware of the affected service and obtain an initial assessment.

10. Communications strategy

- 10.1. Good communication is essential at a time of crisis. A communications strategy will be developed to ensure there are appropriate statements for internal and external communication and processes for ensuring communication to all staff in the case of an emergency.

11. Incident co-ordination facilities

- 11.1. Incident co-ordination facilities will be in place at all locations across the CCG/NHS estate in Lincolnshire.
- 11.2. The BC ICT will state which of these locations is to be used to co-ordinate an incident when notifying managers that an incident has occurred.

12. Business continuity recovery packs

- 12.1. The South West Lincolnshire Business Continuity Manager with support from the GEM Business Continuity Team will develop disaster recovery packs to be located in each Incident co-ordination facility. Copies will also be held by each CCG CO/Officer at their home.
- 12.2. The contents of these packs will be checked for completeness and updated regularly, or whenever there is a change in the BCP which may affect its contents.

13. Business continuity plan maintenance

- 13.1. The CCG Business Continuity Manager with support from the GEM Business Continuity Manager will be responsible for ensuring the BCP is reviewed and updated at regular intervals to determine whether any changes are required to procedures or responsibilities. A complete BCP will be distributed annually to each BC ICT member.
- 13.2. In addition, any unscheduled changes, for example a change to an Incident co-ordination facility, will be conveyed to all areas concerned and updates circulated to each BC ICT member.

14. Training and awareness

- 14.1. Business Continuity Management Training is a statutory requirement placed on the NHS under the UK CCA 2004.
- 14.2. Once in place, the CCG Business Continuity Manager with support from the GEM Business Continuity Team will identify appropriate levels of training and awareness sessions for all CCG staff to ensure business continuity becomes part of the CCG culture and daily business routines, improving the organisations resilience to the effects of emergencies.
- 14.3. The BC ICT will also receive training to ensure team members can perform their role effectively and participate in testing.

15. Testing

- 15.1. The on-going viability of the business continuity program can only be determined through continual tests and improvements. The CCG Business Continuity Manager with support from the GEM Business Continuity Manager will be responsible for ensuring regular tests and revisions are made to the BCP to ensure they provide the level of assurance required.
- 15.2. If there is a major change to the role and structure of South Lincolnshire CCG, plans will be tested and revised once a “settling-in” period has been achieved, to allow for a confident level of recovery.

16. Equality impact assessment

- 16.1. South Lincolnshire CCG aims to design and implement services, policies and measures that are fair and equitable. As part of its development, this policy and its impact on staff, patients and the public have been reviewed in line with the CCGs legal equality duties.

The purpose of the assessment is to improve service delivery by minimising and if possible removing any disproportionate adverse impact on employees, patients and the public on the grounds of race, socially excluded groups, gender, disability, age, sexual orientation or religion/ belief.

- 16.2. An equality impact assessment has been completed and has identified impact or potential impact as “no impact”.
- 16.3. South Lincolnshire CCG will endeavour to make sure that this policy will support a diverse workforce continue to deliver the business of the organisation.

17. Legislation, Standards and References

Civil Contingencies Act (CCA) 2004, Social Care Act 2012
PAS 2015 Framework for health services resilience
International Standard ISO 22301 BCM Requirements and ISO 22313 BCM Guidance
NHS England Business Continuity Management Toolkit 2013.
NHS England Business Impact Analysis Tool 2013

BUSINESS IMPACT ANALYSIS : CORPORATE TEMPLATE

PRIORITISED ACTIVITIES

Reference Number:					
1.	Name of Author:				
2.	Job Title of Author:				
3.	Author telephone and email:				
4.	Date:				
5.	Business Continuity Lead				
6.	Name and description of service and location:				
7.	List the prioritised activities¹ undertaken	Tick as appropriate²			Responsible Officer
		Red	Amber	Green	
i.					
ii.					
iii.					
iv.					
v.					

¹ Prioritise activities are those which priority must be given following an incident in order to mitigate impacts

² **Red** activities are those that must be continued, **Amber** activities are those which could be scaled down if necessary and **Green** activities are those which could be suspended if necessary

1 – Insignificant, 2 – Minor, 3 – Moderate, 4 – Major, 5 – Extreme