



Corporate Business Continuity

Policy Document



DOCUMENT CONTROL

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GLOSSARY OF TERMS

BCM	Business Continuity Management	Holistic management process that identifies potential threats to an organisation and the impact to business operations that those risks, if realised, might cause, and which provides a framework for building organisational resilience with the capability for an effective response that safeguards the interests of its key interested parties, reputation, brand, and value creating activity.
BCMS	Business Continuity Management System	That part of the overall management system that establishes, implements, operates, monitors, reviews, maintains and improves business continuity.
BCP	Business Continuity Plan	Documented collection of procedures and information that is developed, compiled and maintained in the readiness for use in an incident to enable an organisation to continue to deliver its critical activities at an acceptable predefined level
BD	Business Disruption	An event whether anticipated (e.g. a labour strike) or unanticipated (e.g. a power cut), which causes an unplanned, negative deviation from the expected delivery of products or services according to the organisation's objectives.
BIA	Business Impact Analysis	Process of analysing key services and the effect that a business disruption might have upon them
CA	Critical Activities	Those activities which have to be performed in order to deliver the key products and services which enable an organisation to meet it's most important and time-sensitive objectives.
CCA	Civil Contingencies Act	Legislation placing a duty on Local Authorities to have business continuity arrangements in place.
CorA	Corrective Action	The process of reacting to an existing problem or nonconformity and fixing it.
DR	Disaster Recovery	The process, policies and procedures related to the recovery or continuation of technology infrastructure critical to an organisation following a business disruption
EMT	Emergency Management Team	The team that takes the lead role in planning for, coordinating a response to, and supporting the recovery from emergencies, incidents and business disruptions.
IMP	Incident Management Plans	Clearly defined and documented plan of action for use at the time of an incident, typically covering the key personnel, resources, services and actions needed to implement the incident management process.
KS	Key Services	The most important and time sensitive services delivered by the council.
MTPOD	Maximum Tolerable Period of Disruption	Duration after which an organisation's viability will be irrevocably threatened if products and service delivery can not be resumed
PA	Preventative Action	A process for detecting potential problems or nonconformities and eliminating them.
RTO	Recovery Time Objective	Target time set for resumption of product, service or activity delivery after an incident.

1. **The Scope and Objectives of the Business Continuity Management System (BCMS)** (ISO 22301:2012 Ref:4.3)

1.1 Requirements for Business Continuity

1.2 The BCMS shall provide evidence of:

- a clear expression of the organisation's Business Continuity Management (BCM) requirement
- controls and measures that manage its continuity risks
- monitoring and feedback on BCM performance and effectiveness
- continual improvement using objective measurement

1.3 In addition, the BCMS shall provide evidence of:

- a tailored BCM Policy aligned with organisational requirements
- viable organisational structures reflecting BCM roles and responsibilities
- an embedded "Plan-Do-Check-Act" management processes
- a full set of auditable documentation
- established BCM-specific processes, such as Business Impact Analysis (BIA) and Business Continuity Plan (BCP) production

1.4 Acceptable Level of Risk

1.5 Risk is essentially any feature of an organisation which is likely to prevent that organisation from achieving its primary aims. In general, the lower the risk the higher the performance is likely to be. A successful risk management policy therefore needs to take a holistic view of risk as being a potential feature of the whole organisation. The organisation is in turn composed of components which themselves may contain appreciable risk factors.

1.6 Legal and Regulatory Requirements

1.7 The Civil Contingencies Act 2004 requires Category 1 responders (this includes Peterborough City Council) to maintain plans to ensure that they can continue to exercise their functions in the event of an emergency so far as is reasonably practicable.

1.8 The duty relates to all functions, not just emergency response functions. Category 1 responders must have regard to assessments of both internal and external risks when developing and reviewing business continuity plans. These plans may take the form of generic plans, which set out the core of a Category 1 responder's response to any BC incident, or specific plans dealing with particular risks, sites or services.

1.9 There must be a clear procedure for invoking the business continuity plan and it must include arrangements for exercises for the purpose of ensuring the plan is effective. Plans should be exercised at least once a year, with a full live scenario once every three years. Arrangements should be included for the provision of training to those involved in implementing the plan and plans must be reviewed and kept up to date. The training of these individuals should be at least annually or after every major restructure. Category 1 responders are required to publish aspects of their BCPs insofar as making this information available is necessary or desirable for the purposes of dealing with emergencies.

1.10 Interested Parties

1.11 An interested party is a person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity.

For a local authority, typical examples may include:

- staff
- customers
- suppliers
- regulators
- governing bodies
- elected members
- representative bodies
- other local authorities

1.12 Details of interested parties are documented in Teams BIA's.

2. Business Continuity Management Policy (ISO 22301:2012 Ref: 5.3)

2.1 Purpose:

2.2 The purpose of this policy is to formalise the BCMS used by Peterborough City Council (PCC) and to provide guidelines for developing, maintaining and exercising Business Continuity Plans (BCPs). This policy establishes the basic principles and framework necessary to ensure emergency response, resumption and recovery of the organisation's activities during a business disruption.

2.3 Scope:

2.4 This policy applies to all Council staff, facilities and IT systems at all locations. The Council shall be prepared for scenarios including, but not limited to loss of premises, loss of staff, supplier failure, loss of I.T, loss of data and loss of utilities. These events may be localised, impacting a single location or county-wide impacting multiple locations. This policy provides guidance for the resumption and recovery of time sensitive activities in accordance with recovery time objectives.

2.5 Policy:

2.6 PCC recognises the potential strategic, operational, financial and interested parties' risks associated with a business disruption and the importance of maintaining Council's business processes in the event of a business disruption. Business continuity policy and planning are fundamental to ensure against adverse organisational and reputational risk of a business disruption.

2.7 All arrangements will comply with this policy and the Resilience Team will monitor the consistent application of the BCMS to ensure that the Corporate Management Team (CMT) can make decisions based on harmonised information.

2.8 Responsibilities:

2.9 The PCC CMT is responsible for this policy and for ensuring that it is communicated to all persons working for, or on behalf of, the organisation.

2.10 All levels of management within PCC have a responsibility for maintaining business continuity arrangements within their area of business with overall responsibility lying with the Chief Executive Officer.

2.11 Business Impact Analysis and Risk Assessment:

2.12 All activities undertaken by the Council that are involved in providing a service to the community should be included in BIA's. The Critical Activity Analysis holds all critical activities and can be used during an incident to determine recovery priorities.

- 2.13 A BIA will be undertaken by Team Managers to identify critical activities (high priority activity). This will happen once a year; after a Council restructure or after an incident where the Corporate Business Continuity Plan was activated. It shall also identify the recovery time objectives (RTO) and impact of activity not being delivered.
- 2.14 Critical activities will be risk assessed and the owner of that critical activity will take the appropriate loss mitigation or risk treatment measures.
- 2.15 Business Continuity Plans:
- 2.16 CMT shall sponsor the development of the Corporate BCP to assist recovery from an organisation wide crisis and provide, at the very minimum, strategic decisions upon which critical activities should be recovered before others.
- 2.17 BCPs will also be prepared at a Team or Service level, as appropriate, and be owned and signed off by the senior management within this area of business. These plans will cover localised business disruptions and set out processes for recovering critical activities within their RTO and the medium term actions to return to 'business as usual'. These plans will also support the Corporate BCP work effectively.
- 2.18 Specific plans for Services delivered at the Council might be necessary if business operations are significantly different and the Service BCP template isn't suitable; an example is Clare Lodge.
- 2.19 Plans shall anticipate the impact from a variety of probable scenarios, including loss of premises, loss of staff and loss of IT/Telecomms. The BC policy and planning should recognise that staff are the most important asset of Council for ensuring the necessary ability of the Council to continue critical business processes in spite of an incident.
- 2.20 Testing:
- 2.21 The Corporate BCP should be tested annually to ensure credible recovery preparedness. The scope, objectives, and measurement criteria of each test shall be determined and coordinated by CMT on a *per event* basis. Test results shall be shared across the organisation.
- 2.22 Authors or owners of Service BCPs will undertake to carry out tests annually (for example confirming contact numbers and checking the location of resources) to guarantee the accuracy of this information.
- 2.23 Corporate Communications:
- 2.24 The overarching and department/service-specific BCPs shall include mandatory instructions, advice, process, procedure or guidance concerning internal and external communications. External communication during time of crisis is a critical activities. The CMT shall work with Corporate Communications to develop the process and messages that will be communicated to the media and to staff in the event of a county-wide or department/service-specific business interruption.
- 2.25 BCP Maintenance and Management Reporting:
- 2.26 The Corporate BCP and Service BCP's shall be updated annually using the templates provided by the Resilience Team. All PCC departments shall update their BCPs as often as changes require. Major updates should be incorporated as soon as possible and not held to the pre-arranged schedule. Reporting business continuity planning status and progress is a key element of creating an effective BC program in the organisation.

2.27 Business Continuity Programme Governance:

2.28 As demonstrated in this policy, Business Continuity is an institutional concern affecting all departments and therefore must receive senior management guidance and oversight. A formal BC programme governance structure shall be developed to ensure effective decision-making and alignment with ISO 22301:2012.

2.29 Policy Compliance:

2.30 Consistent compliance with this policy is essential to its effectiveness. All PCC Services and Directorates are expected to adhere to this policy and to follow it consistently.

3. **Provision of Resources** (ISO 22301:2012 Ref: 7.1)

3.1 The organisation shall determine and provide the resources needed that will:

- Achieve its business continuity policy and objectives;
- Meet the changing requirements of the organisation
- Enable effective communication on business continuity management system matters, internally and externally; and
- Provide for the ongoing operation and continual improvement of the business continuity management system.

3.2 CMT has appointed the Chief Executive as the person with appropriate seniority and authority to be accountable for the BC Policy and its implementation.

3.3 The Resilience Manager has been appointed to implement and maintain the BCMS.

3.4 Each Service/Directorate shall identify at least one BC Champion who will coordinate the assessment of key services through the BIA and produce Service/Directorate level BCPs.

3.5 Further BC Champions may be appointed as dictated by the requirement to deliver key activities.

3.6 BC roles, responsibilities, competencies and authority shall be defined and documented within each BCP. Dependent on individual BCPs these will include:

- telecommunications and information systems
- office buildings and facilities
- service facilities
- plant and equipment
- personnel

4. **The Competency of Personnel, Training and Awareness Programmes**

(ISO 22301:2012 Ref: 7.2 & 7.4)

4.1 The Council shall ensure that personnel who are assigned business continuity responsibilities are competent to perform the required tasks by creating a competence development programme as a way of providing training, education and support.

4.2 The Resilience Team will be responsible for providing training to individuals that they have identified as having a role within the Service BCP's.

- 4.3 The Resilience Team will provide training to individuals who have a responsibility to develop and maintain business continuity arrangements.
- 4.4 The Council shall ensure that persons working under its control will have an appropriate awareness of the BCMS. This shall be achieved through an awareness programme.
- 5. BCM Exercising (ISO 22301:2012 Ref: 8.5)**
- 5.1 The Council shall exercise its BC arrangements to ensure that they meet business requirements by creating an exercise programme. The organisation shall:
- develop exercises that are consistent with the scope and objectives of the BCMS;
 - have a programme approved by CMT to ensure exercises are carried out at planned intervals and when significant changes occur;
 - carry out a range of different exercises that taken together validate the whole of its business continuity arrangements;
 - plan exercises so that the risk of an incident occurring as a direct result of the exercise is minimized;
 - define the aims and objectives of every exercise;
 - carry out a post-exercise review of each exercise that will assess the achievement of the aims and objectives of the exercise; and
 - produce a written report of the exercise, outcome and feedback, including required actions.
- 6. Maintaining and reviewing BCM arrangements (ISO 22301:2012 Ref: 9.1)**
- 6.1 The Council will review annually or after significant changes occur, its BCM arrangements and capability to ensure their continuing suitability, adequacy and effectiveness.
- 6.2 The review of BC arrangements shall be conducted either through self-assessment or audit.
- 6.3 The self-assessment programme will be coordinated by the Resilience Team in conjunction with the plan owner/author and action will be taken to address the gaps identified in the assessment.
- 6.4 In the event of an incident that results in the invocation of the Corporate Business Continuity Plan or a Service BCP, a post-incident review shall be undertaken to:
- identify the nature and cause of the incident;
 - assess the adequacy of management's response;
 - assess the organisation's effectiveness in meeting its recovery time objectives;
 - assess the adequacy of the BC arrangements in preparing employees for the incident; and
 - identify improvements to be made to the BC arrangements.
- 6.5 It is the responsibility of all services to inform the Resilience Team of all invocations via the actions outlined in Service BCP's and to coordinate post incident review and inform CMT annually on the organisations state of preparedness.
- 7. Internal Audit (ISO 22301:2012 Ref: 9.2)**
- 7.1 The guidance states that the organisation shall ensure that internal audits are conducted triennially to determine whether the BCMS:

- conforms to planned arrangements for BC, including the requirements of this BCM standard; and
- has been properly implemented and is maintained; and
- is effective in meeting the organisation's BCM policy and objectives; and
- provides information on the results of audits to management.

7.2 The audit programme(s) shall be planned, established, implemented and maintained by the organisation, taking into account the BIA, risk assessment, control and mitigation measures and the results of previous audits.

7.3 Audit procedure(s) shall be established, implemented and maintained that address:

- the responsibilities, competencies and requirements for planning and conducting audits, reporting results and retaining associated records; and
- the determination of audit criteria, scope, frequency and methods.

Selection of auditors and conduct of audits shall ensure objectivity and the impartiality of the audit process.

8. Management review of the BCMS

8.1 CMT shall review the organisation's BCMS at planned intervals and when significant changes occur to ensure its continuing suitability, adequacy and effectiveness. This review shall include assessing opportunities for improvement and the need for changes to the BCMS, including the business continuity management policy and business continuity management objectives. The results of the reviews shall be clearly documented and records shall be maintained.

8.2 The Management review shall include appraisal of:

- the status of actions from previous reviews;
- the performance of the management system including trends apparent from nonconformities and corrective actions, the results of monitoring and measurement, and audit findings;
- changes to the organisation and its context that might impact the management system; and
- opportunities for continual improvement.

8.3 The output from the management review shall include any decisions and actions related to:

- varying the scope;
- improving the effectiveness ;
- modifying the strategy and procedures, including changes to:
 - business requirements;
 - resilience requirements;
 - business processes affecting the existing business requirements;
 - statutory, regulatory and contractual requirements; and levels of risk and/or levels of risk acceptance;
- resource needs; and funding and budget requirements.

9. Preventive and Corrective Actions

9.1 PCC shall improve the BCMS through the application of preventive and corrective actions. Any preventive or corrective action taken shall be appropriate to the magnitude of the problems and commensurate with the business continuity policy and

organisational objectives. Changes arising from preventive and corrective actions shall be reflected in the BCMS documentation.

10. Continual Improvement

The organisation shall continually improve the effectiveness of the BCMS through the review of the business continuity policy and objectives, audit results, analysis of monitored events, preventive and corrective actions, and management review.