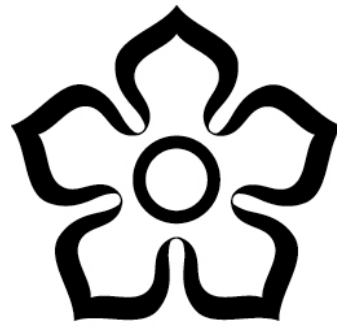


Appendix 2



Leicester
City Council

Business Continuity Management Policy Statement and Strategy 2020

14/10/2019

Leicester City Council

Sonal Devani on behalf of Miranda Cannon

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Business Continuity Management

Policy Statement and Strategy 2020

Business Continuity Management Policy Statement

Disruptive unexpected events occur. It might be an external event such as severe weather, utility failure, terrorist attack or pandemic flu, or an internal incident such as ICT failure, loss of a major supplier or loss of a key building. Such events are usually low likelihood, but high impact and need to be planned for. The council is committed to ensuring robust and effective Business Continuity Management (BCM) as a key mechanism to restore and deliver continuity of key services in the event of a disruption or emergency, hence the creation of this Policy for BCM at Leicester City Council (LCC) and which ensures the council fulfils our duties under the Civil Contingencies Act 2004.

By planning *now* rather than waiting for it to happen, we can get back to normal business in the quickest possible time. This is essential for those who rely on council services and it helps our community retain confidence in the council. Planning ahead means firefighting is kept to a minimum, staff feel able to handle such situations and there is reduced reputational damage and reduced potential for financial loss.

In a disruptive situation, it will not be possible to run **all** council services as normal. Whilst all services are important, priority for recovery will be given to those that are the most essential, referred to as the business-critical activities – those that the Board has agreed must be back up and running within 24 hours, and where resources will be directed first. It is unrealistic to expect the entire service, critical or not, to be recovered immediately. In this case, the essential parts of the service are to be restored followed by the non-essential elements when possible – reasonable and practicable action is taken. All services whether deemed critical or not, should have Business Continuity Plans (BCPs) in place which align with ISO22301.

All services and all staff have responsibilities for ensuring the council continues to operate through any crisis. The BCM Strategy and Policy sets the framework for our BCM approach the key elements of which include:

- Business Continuity Planning will be aligned with the International Standard for Business Continuity, ISO22301.
- A Corporate Business Continuity Plan (CBCP) which is revised and maintained annually. Each senior manager will contribute to an annual review of the CBCP with the assistance of the Manager, Risk Management;
- Business critical services are agreed by the Corporate Management Team;
- Clear roles and responsibilities defined within both the corporate and service business continuity plans and which staff are fully aware of;
- Managers have responsibility for ensuring an effective BCP is in place for their service area which meets the expected standard and which is regularly reviewed
- Training provided to staff on BCM;
- The council will implement a programme of BCP testing exercises and learning is reflected in plans.

Andy Keeling
Chief Operating Officer

Sir Peter Soulsby
City Mayor

Business Continuity Management Strategy

1. DEFINITION

Business Continuity Management (BCM) can be defined as:

'A holistic management process that identifies potential threats to an organisation and the impacts to business operations that those threats, 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 stakeholders, reputation, brand and value creating activities.'

ISO 22301 Societal security – Business continuity Management systems - Requirements

BCM is about the council preparing for a disaster, incident or event that could affect the delivery of services. The aim being that at all times key elements of a service are maintained at an emergency level and brought back up to an acceptable level as soon as possible. Although the immediate response to a disruption is a key component, business continuity is also concerned with maintenance and recovery of business functions following such a disruption.

BCM is not simply about writing a plan, or even a set of plans. It is a comprehensive management process that systematically analyses the organisation, determines criticality of services, identifies threats, and builds capabilities to respond to them. It should become our 'culture - the way we do things'.

2. SCOPE

BCM is a cross-functional, organisation-wide activity; consequently, the arrangements in this strategy apply to all parts of the council.

Business Continuity should also apply to outsourced contracts and services as well as suppliers, service partners and other relevant stakeholders. This is covered in more detail in section 13. The aim is to ensure that business continuity standards are in place so that the service provider is able to deliver acceptable standards of service following a disruption to the organisation or the supplying company.

3. REQUIREMENTS AND STANDARDS

In addition to making sound business sense for any organisation, the Civil Contingencies Act 2004 places a statutory duty upon the council, and as a Category 1 responder, Leicester City Council (LCC) is to:

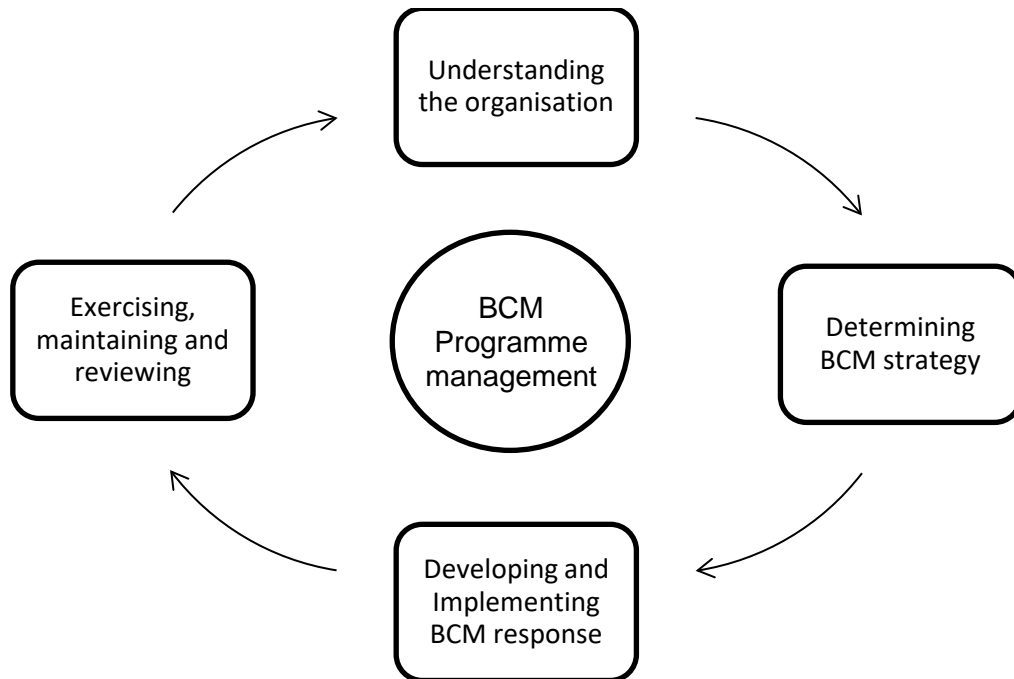
- Maintain plans to ensure that it can continue to exercise its functions in the event of an emergency so far as is reasonably practicable;
- Assess both internal and external risks – achieved through compliant risk assessment in line with the Risk Management Strategy and Policy;
- Have a clear procedure for invoking BCP's;
- Exercise plans and arrange training to those who implement them;
- Review plans and keep them up to date;
- Ensure arrangements to warn, inform and advise the public relating to an emergency are in place;
- Co-operate with other Category 1 responders during and after incident and
- To advise and assist local businesses and organisations with their BCM arrangements.

BCM arrangements are effective only if specifically built for the organisation. The council's programme is aligned with the principles of ISO22301, the International Standard, and to BS11200 Crisis Management Guidance and Good Practice, a recent standard for Crisis Management which is reinforced by reference to the Business Continuity Institute's Good Practice Guidelines.

4. METHODOLOGY

The ultimate aim is to embed BCM within the council's culture. Training and education is an ongoing task but awareness and capability is also a product of the structures put in place and the way we manage our programme.

Embedding BCM in the organisation's culture



BCM programme management involves:

- Assigning responsibilities for implementing and maintaining the BCM programme within the council;
- Implementing business continuity in the council – including the design, build and implementation of the programme;
- The ongoing management of business continuity – including regular review and updates of business continuity arrangements and plans.

Key stages in a BCM programme are:

1. Understanding the organisation:

This stage involves the use of business impact analysis and risk assessments to identify critical deliverables, evaluate priorities and assess risks to service delivery (see below). This step involves intelligent, in-depth information-gathering.

- **Business Impact Analysis (BIA)** – identifying the critical processes and functions and assessing the impacts on the council if these were disrupted or lost. BIA is the crucial first stage in implementing BCM, and helps measure the impact of disruptions on the organisation;
- **Risk assessment** – once those critical processes and functions have been identified, a risk assessment can be conducted to identify the potential threats to these processes.

2. Determining an appropriate Business Continuity Strategy:

Making decisions based on analysis of data gathered. Setting recovery time objectives for services and determining resources required. The identification of alternative strategies to mitigate loss, and assessment of their potential effectiveness in maintaining the council's ability to deliver critical service functions.

The council's approach to determining BCM Strategies will involve:

- Implementing appropriate measures to reduce the likelihood of incidents occurring and/or reduce the potential effects of those incidents;
- Taking account of mitigation measures in place;
- Providing continuity for critical services during/following an incident;
- Identifying key staff who would be involved in a BCM response to an incident and accessibility to critical BCPs;
- Considering services that have not been identified as critical.

3. Developing and implementing a BCM response:

BCPs are created to address the strategic, tactical and operational requirements of the organisation. It is crucial to evidence the response structure to an incident in the BCPs (see section 7 for more detail).

The Corporate Business Continuity Plan (CBCP) and service areas BCP pulls together the organisation's strategic response to a disruption and enables resumption of business units according to agreed corporate priorities and provides strategies for use by response teams. The BCP ensures that the following actions are considered:

- The immediate response to the incident;
- The interim solutions or maintaining an emergency level of service;
- Reinstating full services.

4. Exercising, maintaining and reviewing:

- **Testing and Exercise** – Testing plans helps to ensure they are in step with organisational changes and can be audited against defined standards. **An exercise programme will enable the organisation to:**
 - Demonstrate the extent to which strategies and plans are complete, current and accurate; and
 - Identify opportunities for improvement
- **Maintenance of BCPs** – Ensures that the organisation's BCM arrangements and plans are fit for purpose, kept up to date, quality assured and support an effective response.
- **Review and Lessons Learnt** - Assesses suitability and adequacy and effectiveness of the BCM programme and identifies opportunities for improvements. It is imperative that a debrief is held after an incident with the involvement of relevant parties, be it internal or external for example, it should include those who are involved in the planning of how to deal with an incident affecting that service area and in the recovery from the incident. Lessons learnt should be taken on board and relevant actions taken by the assignee and reflected in their service area BCPs, as well as relevant procedures and guidance.

5. ROLES AND RESPONSIBILITIES

The table below details the roles and responsibilities of those involved in BCM, it's planning, implementation and invocation of plans.

City Mayor / Executive	<ul style="list-style-type: none"> Approve the council's Business Continuity Strategy and Policy Statement annually.
Audit and Risk Committee	<ul style="list-style-type: none"> Ensure that the Business Continuity Strategy is produced, approved by the Executive and updated regularly; Monitor effectiveness of Business Continuity Management (BCM) arrangements via reports from the Manager, Risk Management Note the BC Policy & Strategy
Chief Operating Officer / BCM Champion	<ul style="list-style-type: none"> During an incident, lead the Council's 'Strategic' (Gold) Incident response.
Strategic and Operational Directors	<ul style="list-style-type: none"> Ensure the BCM policy, strategy and development plan is enforced and resourced appropriately; Participate as required in management teams within the Corporate Business Continuity Plan (CBCP); Ensure appropriate levels of staff sit on the 'Strategic' (Gold) and 'Tactical' (Silver) Recovery teams within the CBCP; Ensure each of their Service Areas has an effective and current BCP in place which is reviewed each year; Annually self-certify that effective plans exist for all their services, that these plans remain current and 'fit for purpose'; and that any testing of those plans has been carried out (with the assistance and support of Risk, Emergency & Business Resilience (REBR), if required); Identify staff for training and also keep themselves updated on BCM practice; Embed BCM culture into the ethos of operational management
Corporate Management Team	<ul style="list-style-type: none"> Approve the BC Strategy and Policy annually and ensure implementation
Manager, Risk Management / Business Continuity & Risk Officer	<ul style="list-style-type: none"> Overall responsibility for co-ordinating the BCM programme; During an incident, co-ordinate the council's BCM incident response(s), supporting the COO as 'Strategic' lead; Following an incident, facilitate the 'lessons learned' session(s); Produce the Corporate BCM framework and key strategies; Make available best practice tools (e.g. templates); Identify training needs and arrange delivery; Support and advise service areas; Facilitate the self cert process; Facilitate testing and exercising of the council's BCPs when requested by Directors/their teams; Quality control – review BCM arrangements for services; Lead on the council's statutory duty to promote BCM in the community.
All Heads of Service / Managers	<ul style="list-style-type: none"> Lead Business Continuity arrangements within their area; Attend training commensurate with their role; Identify staff from their teams that have a role to play in any recovery for suitable training; Prepare a recovery plan covering all service delivery functions (priority for critical functions), update at least annually; and, Implement the agreed arrangements in the event of a disruption.
All Staff	<ul style="list-style-type: none"> Familiarisation with business continuity arrangements within their area; Attend training commensurate with their role; Engage with testing and exercising; Respond positively during a crisis.

6. INVOKING THE CORPORATE BUSINESS CONTINUITY PLAN (CBCP)

The CBCP is a high-level strategic response plan which is accessible to all 'on call senior officers'. This plan will not allow recovery of individual services but guides them to allow for the recovery of affected services, with the use of the service area's own plans. The CBCP may be invoked by any member of the council's Corporate Incident Response Team (CIRT) as defined within the plan itself. Effectively, the CBCP covers the Council's 'Strategic' (Gold) and 'Tactical' (Silver) level responses with individual service area plans covering the 'Operational' (Bronze) level.

The CBCP is triggered by serious situations such as:

- Serious danger to lives and/or the welfare of council staff, Members, visitors or service users;
- Major disruption of council services or interruption of any of its business-critical activities (as listed in the CBCP);
- Serious loss or damage to key assets;
- Serious impact on the council's financial status or political stability; or
- Emergency situations in Leicester, or the wider Local Resilience Forum area (Leicester, Leicestershire and Rutland).

7. CORPORATE INCIDENT RESPONSE TEAM

The council has put in place a 3-tier incident management structure: - the Strategic (Gold) and Tactical (Silver) teams have control of the situation and are authorised to take all decisions necessary. The Strategic (Gold) Team have overall control by overseeing, directing and authorising the work of the Tactical (Silver) Team who are managing the response and deciding, and monitoring, the actions for the Operational (Bronze) team(s) to implement.

The CBCP sets out this process in more detail. The following teams are subject to change as the BCM Programme develops, but currently are as follows:

Incident Response Team:

- Comprises principally of those Directors and Senior Heads of Service who have responsibility for a defined Business Critical Activity;
- Manages and directs the council's response to a serious incident affecting council services or assets;
- Comprises of the Strategic (Gold) and Tactical (Silver) teams;
 - **Strategic (Gold) Team** will act as a 'check and challenge' function and leads on communications (internal and external), workforce-related matters and directs non critical services;
 - **Tactical (Silver) Team** will manage the Operational (Bronze) Recovery teams and keeps the Strategic (Gold) team informed of developments.

Recovery Teams:

- Comprises principally of Heads of Service and their senior managers;
- Collective responsibility for resumption of critical services within their divisions by means of their own individual BCPs;
- Will be directed by and report back to the CBCP 'Tactical' (Silver) team.

The above establishes the command, control and communication system helping to ensure the organisation has clearly documented and well understood mechanisms for responding to an incident regardless of its cause.

8. MAINTENANCE OF THE CBCP

Ensuring that the plan reflects ongoing changes within the business is crucial. This involves revising the document and amending to reflect updates, testing the updated plan, informing and updating the on call team/authorised personnel. The Manager, Risk Management/Business Continuity & Risk Officer are responsible for this maintenance task and annually they ensure that the CBCP undergoes a formal/complete review which may lead to major revisions and to confirm the incorporation of changes required via the on-call team/directors.

9. BUSINESS CRITICAL SERVICES BCPs

Annually, the Business Continuity & Risk Officer/Manager, Risk Management circulate a reminder to business-critical services plan owners requesting a thorough update of the plan for submission to REBR. The Business Continuity & Risk Officer facilitates this process. Although, changes should be made to their BCP's as and when new staff join or leave, to reflect office moves, procedures changing, a thorough review is expected annually, usually by the financial year end.

Each department is responsible for keeping its contact lists up to date and issuing off site documentation to new members of staff in their service areas BCPs'. These revisions will need to then be distributed to all authorised personnel, who exchange their old plans for the newly revised plans.

10. LOCATING BCPS

The CBCP and BCPs from business-critical services are held securely on the LCC pages hosted on Resilience Direct (a secure Government IT platform within which LCC have a restricted area) as well as the restricted pages on REBR's site on SharePoint.

BCPs should be saved electronically and onto a memory stick (ensuring that the memory stick is an encrypted one). Holding paper copies is acceptable as this mitigates the risk of total loss of ICT, however, also being cautious of such a method as the plan will contain confidential information. Ensure staff within teams are aware who have access to their service area BCP. This will ensure smoother and faster recovery following an incident.

11. BUSINESS CONTINUITY SELF CERTIFICATION

Annually, all Directors will self-certify that BCPs are in place for all their services where the Manager, Risk Manager will facilitate the process and report to Corporate Management Team.

12. MANAGING BUSINESS CONTINUITY INCIDENTS AND INCIDENT MANAGEMENT SYSTEM

REBR support and advise service areas during a business continuity incident to help them manage a response to an incident. After an incident has concluded, REBR can assist with conducting the debrief and lessons learnt session, involving all the relevant parties to assist service areas collect feedback to draw up a list of lessons learned and if necessary, amend BCPs appropriately to reflect any changes.

On-call officers are regularly briefed by REBR on how to deal with internal and external incidents and its response. In addition, they are also briefed on guidance, plans and processes available to them to aid in the response of an incident.

REBR have access to an Incident Management System (IMS) to log incidents. This cloud web-based system is accessible anywhere as long as there is internet access and all logs are timed, dated and by whom. All key LCC responders are/will be given access to log entries during an incident. This is to be used for all major and minor incidents and will help towards conducting the debrief and lessons learnt session.

13. BUSINESS CONTINUITY AND PROCUREMENT

Contracts for goods and/or services deemed critical to business continuity should include a requirement for each nominated supplier to give an assurance and evidence that robust BCP arrangements are in place covering the goods and/or services provided. When procuring critical goods and/or services, the need for further business continuity requirements in the specification and/or evaluation criteria must be considered.

14. BCM IN THE COMMUNITY

The council will participate in appropriate practitioner groups and work with partner agencies and schools to promote BCM in the community and will advise and assist local organisations with their BCM arrangements.

15. MULTI-AGENCY BUSINESS CONTINUITY GROUP

The Manager, Risk Management will continue to chair this group which involves partner agencies such as emergency services, utilities, voluntary organisations. These meetings highlight how partner agencies respond to an incident and its business continuity implications.