



Wigan Borough
Clinical Commissioning Group

Business Continuity Management Policy

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Introduction

1. Wigan Borough Clinical Commissioning Group (CCG) has a leading role in ensuring that healthcare services are provided for the people within the Wigan Borough. Essentially, the role of the organisation is to buy in or commissioning services that meet the varying health needs of the local population. These services may be provided by NHS organisations, such as local NHS hospitals and Trusts, or other private and voluntary organisations.
2. Commissioning is a key function of the NHS and CCGs spend 80% of the NHS annual budget. Given the key role that THE CCG plays within the local health system, it is important that the organisation is able to continue its activities in the face of situations that might be, or could lead to disruption, loss, emergency or crisis.
3. Under the Civil Contingencies Act 2004, Clinical Commissioning Groups are identified as 'category two' responders. Although the Act places a lesser set of duties upon category two responders than it does upon 'category one' responders, Department of Health and NHS England expect NHS organisations to plan for and respond to incidents in the same way as category one responders¹.
4. Therefore, as well as seeking to maintain and protect its staff, stakeholders, reputation, information, sites, facilities and finances, the CCG, as an NHS body, also needs to establish effective business continuity arrangements in order to meet the requirements of the national programme for NHS resilience, under which NHS bodies must ensure they have in place appropriate incident response structures and business continuity plans.

Purpose

5. The aim of this policy is to provide a framework for the development and operation of a business continuity management programme for the CCG. By implementing this policy, The CCG will demonstrate its commitment to establishing, implementing, reviewing and continually improving business continuity management. The policy sets out the scope of the CCG's arrangements for business continuity management and describes the approach and operational activities (the BCM programme) that the CCG will implement in order to develop, maintain and improve organisational readiness to respond to and recover from disruption.

¹ NHS England Core Standards for Emergency Preparedness, Resilience and Response

6. In the past organisations in the UK developed their business continuity management in line with BS25999. However, this standard has been replaced by ISO 22301 and this policy takes into account the requirements of the revised international standard for business continuity.
7. **Benefits of Business Continuity Management** – as well as allowing the organisation to fulfil its resilience requirements as an NHS body, implementation of BCM offers WBCCG a range of benefits:
 - Effective business continuity arrangements allow the CCG to continue to needs and expectations of interested parties;
 - A properly implemented business continuity management programme helps the organisation to identify areas of weakness, duplication and inefficiency, which can offer the CCG the opportunity to become more resilient and more cost-effective;
 - Correctly implemented, BCM promotes greater staff engagement in the successful running of the CCG as it involves CCG staff in efforts to enhance the resilience of the organisation.
 - BCM can also be seen as part of the CCG's efforts to fulfil its duty of care to employees, stakeholders and the wider community as it supports the organisation to discharge its duties and maintain employment throughout a period of disruption.

Definitions

8. Table 1 shown below provides definitions of key terms used within this policy and in relation to the CCG's business continuity arrangement.

| Table 1: Definitions | |
|-----------------------------|---|
| BC | Business continuity is the capability of the organisation to continue delivery of its products and services at acceptable levels following a disruptive incident. |
| BCM | Business continuity management is a holistic management process that provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of key stakeholders, reputation, brand and value-creating activities. |
| BCMP | A business continuity management programme is the ongoing management and governance process supported by Top Management and appropriately resourced to implement and maintain BCM. |
| BCP | A business continuity plan provides documented procedures that guide the organisation to respond, recover, resume and restore to a pre-defined level of operation following disruption. |

Roles and Responsibilities

Chief Officer

9. Take overall ownership of the CCG's business continuity management programme
10. Ensure a policy and objectives are established for the CCG's business continuity management programme
11. Ensure resources needed for the CCG's business continuity programme are available

Accountable Emergency Officer

12. Ensure the CCG meets the business continuity requirements to set out within the NHS EPRR Core Standards.

13. Direct and support the CCG staff to contribute to effective business continuity managements.
14. Promote the importance and need for continual improvement of business continuity management within the CCG.
15. Provide an annual update to the CCG Corporate Governance Committee on business continuity management.

CCG Staff

16. Contribute to the development, completion and implementation of relevant business continuity management processes, documents and activities for the CCG.
17. Review and update the CCG's business continuity management documents.
18. Contribute to the continual improvement of the CCG's business continuity.

GMSS Resilience Team

19. Provide business continuity management guidance and advice to the Accountable Emergency Officer and the CCG staff.
20. Develop relevant business continuity management templates for use by the CCG.
21. Support the CCG with the development and delivery of appropriate business continuity management awareness raising, training, testing and exercising.

Business Continuity Management

Priorities

22. By implementing and maintaining a business continuity management programme, the CCG seeks to achieve the following priorities should a disruptive incident affect the CCG:
 - Protect the safety of people employed by or working with the CCG;
 - Maintain, recover, resume or restore the CCG's priority activities;
 - Protect the interests of the CCG stakeholders;
 - Protect the CCG's finances, property, resources and reputation.

Disruptions

23. The CCG's BCM policy seeks to address the following disruptions that may arise as a consequence of some form of incident, interruption or termination.
24. **Loss of people** – A range of possible scenarios (e.g. industrial action, severe weather causing transport disruption/closures, an influenza pandemic) could cause the CCG to experience loss of key personal, knowledge, skills, relationships or contacts.
25. **Loss of premises** – Fire, utility failure, civil disorder in a locality or gas explosion are examples of scenarios that could lead to denial of access to buildings, facilities or accommodation and the inability to undertake CCG activities from normal place of work.
26. **Loss of resources** – Resources that support the CCG's activities, such as IT hardware, IT systems and networks, databases, telephony or other equipment may suffer failure, theft or malicious damage.
27. **Loss of suppliers** – Third party providers of goods and services to the CCG may experience disruption themselves or may suspend or cease operation for some reason (e.g. bankruptcy, fraud investigation, statutory breach).
28. **Activities and Locations within Scope** – the policy will apply to all activities that come under the operation of the CCG. However, it is acknowledged that some CCG activities, owing to their more time sensitive nature, will be more susceptible than others to the impacts of a disruptive incident. Therefore the CCG will undertake analysis of its activities to establish the organisation's 'prioritised activities'. Initial business continuity efforts will be focused on these prioritised activities with other activities falling within the scope of the BCM programme in due course. In this way the CCG will adopt the 'lifecycle' approach to business continuity as recommended by good practice, which will allow the organisation to continually improve its BCM arrangements.
29. The policy will be applicable to the main site utilised by the CCG located on the third floor in the Wigan Life Centre, College Avenue, Wigan WN1 1NJ. All staff based within the CCG's accommodation at the Wigan Life Centre, including those from other organisations such as staff from Greater Manchester Shared Services, should make themselves familiar with the business continuity arrangements that are applicable to Wigan Life Centre.
30. **Interested Parties** – Table 2 below provides a summary of individuals or organisations that have an interest in or may be affected by the CCG's business continuity management. The needs and expectations of these interested parties will be taken into account within the operation of the CCG's

business continuity management programme. This policy will be made available to all interested parties.

| Table 2: Interested Parties | |
|---|---|
| Interested party | Nature of interest in the CCG's BCMP |
| Great Manchester CCGs | Working in partnership |
| NHS England (Greater Manchester Health and Social Care Partnership) | Working in partnership |
| Wigan Council | Working in partnership/service provider for Wigan Borough CCG |
| NHS funded providers: <ul style="list-style-type: none"> • Wrightington, Wigan and Leigh NHS Foundation Trust • North West Boroughs Healthcare NHS Foundation Trust • Bridgewater Community Healthcare Trust | Working in partnership/service provider for Wigan Borough CCG |
| Greater Manchester Shared Services | Support and service provider for Wigan Borough CCG |
| NHS Shared Business Services | Business support services |
| Other GM NHS commissioners and providers | Mutual aid arrangement to support NHS organisations |
| MIAA | Internal Audit & counter Fraud |
| Grant Thornton | External Auditor |

31. **WBCCG Approach to Business Continuity Management** – The following underpin the CCG’s BCM policy and are the norms to which the organisation aspires:
32. To be successful, business continuity management must be introduced and supported by the CCG’s Executive Management Team.
33. Business continuity is part of everyone’s job and must be integrated into core CCG business processes.
34. Those that undertake the activities delivered by the CCG are best placed to understand the continuity requirements of those activities.
35. The CCG’s business continuity management programme is a continually evolving process.
36. When a business continuity event occurs, CCG staff may need to work in different ways and/or different locations than they would normally.
37. Business continuity procedures will be sufficiently detailed and clear so that someone other than the person primarily responsible for the work can follow them.
38. The CCG will learn from business continuity events and disruptions.
39. The CCG’s business continuity management will integrate with the CCG’s roles described within the health economy Incident Response Plan.
40. **Guidelines** – This policy has been developed with reference to the Business Continuity Institute Good Practice Guidelines 2013. The CCG will operate a business continuity management programme that follows the ‘lifecycle’ described within the Good Practice Guidelines 2013 (Appendix 1).
41. The CCG will also take into account the business continuity guidance and toolkits on business continuity issued by the NHS England Business Continuity Working Group, coordinated by the National Support Centre.
42. **Standards** – The CCG will align its business continuity management arrangements with the requirements of the international standard for business continuity, ISO 22301. Implementation of this policy will allow the CCG to demonstrate its commitment to meeting the CCG business continuity requirements set by NHS England within the Core Standards for emergency preparedness, resilience and response (EPRR).
43. **Business Continuity Objectives** – In order to implement and maintain an effective business continuity management programme, the CCG will establish

and communicate relevant business continuity objectives. These objectives will be consistent with this policy, be measurable, take into account applicable requirements and be monitored and updated as appropriate.

44. **Resources** – In order to implement and sustain an effective business continuity management programme the CCG will ensure there are suitable finance and operational resources available to the programme. These will include the nomination of an appropriately senior CCG business continuity ‘champion’ and the approval by senior management for sufficient staff involvement in business’s continuity programme activities, such as business continuity plan preparation, testing and exercising.
45. **Processes** – The CCG will implement appropriate processes for business continuity management to ensure that the organisation aligns with good practice and meets the relevant standards for business continuity. These processes will cover the full ‘BCM Lifecycle’ and will include the following:
 - Business impact analysis and risk assessment, taking into account worse case scenarios and the Greater Manchester Community Risk Register;
 - Identification of continuity strategies and options;
 - Development and implementation of a business continuity plan;
 - Integration with existing incident response protocols;
 - Training, testing and exercising of business continuity arrangements;
 - Embedding business continuity within core CCG business processes, including processes for communication and awareness.
46. As a minimum, processes such as testing and exercising of business continuity arrangements will be undertaken at least annually.
47. **Documents** – At the heart of the CCG’s business continuity management programme will be three key documents.
48. **Business Continuity Management Policy** – this document identifies what the CCG intends to do about BCM and outlines the organisation’s programme for BCM.
49. **Business Continuity Impacts and Strategies Toolkit** – identifies the CCG’s key activities, the potential impacts and risks of disruptions to them as well as the strategies/options for dealing with disruptions.
50. **Business Continuity Plan (BCP)** – documents the CCG’s procedures for responding to disruptive incidents.

51. The CCG will develop additional documents as required to support the business continuity management programme, such as training and exercising logs or incident debrief reports.
52. All documents relating to the CCG's business continuity management programme will be appropriately identified and described (e.g. will include a title, date, author and version number) and will be available, as appropriate, electronically or as a paper copy.
53. **Communication and Awareness** – This policy along with all supporting and associated business continuity information and documents will be placed in appropriate places on the CCG's SharePoint and network drive.
54. The business continuity management programme will be promoted in various ways (e.g. via CCG email circulation, in CCG meetings, at meetings of the Wigan Borough Resilience Forum and during induction of new starters) and consideration will be given to the options for enhancing understanding and awareness of the programme through channels such as staff drop-in sessions, seminars and e-learning.
55. **Governance** – the CCG's business continuity management arrangements will link with the organisation's established governance risk management processes.
56. **Audit and Review** – An audit of the CCG's business continuity management arrangements will be in line with the CCG's established audit procedures and may be subject to internal or external audit as required.
57. This policy will undergo formal review every two years or after significant organisational change to ensure content remains applicable. Review of this policy will be undertaken by the Corporate Governance committee. Additional review may be undertaken following incidents or disruptions. By undertaking a regular review of the BCM programme, the CCG will seek to continually improve the suitability and effectiveness of its business continuity arrangements.

Equality, Diversity & Human Rights Impact Assessment

58. The CCG is committed to promoting Equality & Diversity Strategy 2016 – 2019.
59. It is important to address, through consultation, the diverse needs of our community patients, their carers and our staff. This will be achieved by working to the values and principles set out in the CCG's Equality, Diversity and Human Rights Strategic Framework.

60. To enable the CCG to meet its legislative duties and regulatory guidance, all new and revised procedural documents, services and functions are to undertake an impact assessment to ensure that everyone has equality of access, opportunity and outcomes regarding the activities. Contact the Quality Team for support to complete an initial assessment. Upon completion of the assessment, the Quality Team will assign a unique EqIA Registration Number. The CCG undertakes Equality Impact Assessments to ensure that its activities do not discriminate on the grounds of:

Age
Disability
Gender reassignment
Marriage and civil partnership
Pregnancy and maternity
Race
Religion or belief
Sex
Sexual orientation

61. Before any committee, group or forum validates a strategy, policy or procedural document and EqIA Registration Number will be required.

Consultation & Approval Process

62. Advice on this document has been provided by GMSS Resilience Team.
63. Consultation with the Senior Management Team
64. Approval by Senior Leadership Team for onward approval by the Corporate Governance committee.

Dissemination & Implementation

65. **Dissemination** – Following approval the document will be submitted to the Governance Team for registration and uploaded on to SharePoint.
66. **Implementation** – Awareness will be raised via the Governing body, committees and team meetings.

Monitoring Compliance

67. The Assistant Director of Governance is responsible for monitoring compliance with the Document Control Policy.

68. This will be completed on an annual basis and reported to the Corporate Governance Committee.
69. The following will be monitored for compliance:
- Approval processes for strategies and policies;
 - Is there a minute detailing the approval at the appropriate committee and Governing Body?
70. Document and archiving control for the policy:
- Is the document control page correctly completed including incremental version number?
 - Is this document on SharePoint in PDF format?
 - Is the previous version held by the Governance Team archive?
 - Does the document meet the standard style and format criteria?

Standards and Key Performance Indicators

71. This policy must be reviewed every two years or when there are significant changes in the policy.
72. This policy will be monitored for effectiveness by self-assessment against any external accreditation that is applicable and may be subject to review by internal audit.

References & Bibliography

73. **Good Practices Guidelines 2013 and 2018.** *A guide to Global Good Practice in Business Continuity*, Business Continuity Institute
74. **ISO 22301:2012**, *Societal security – Business continuity management systems – Guidance*, International Organisation for Standardisation
75. **ISO 22313:2012**, *Societal security – Business continuity management systems – Guidance*, International Organisation for Standardisation
76. **PAS 2015**, *Framework for Health Services Resilience*, (2010) British Standards Institute

Associated Documents

77. **NHS England Emergency Preparedness, Resilience and Response Framework 2015**, NHS England
78. **NHS England Business Continuity Management Framework 2013 (Service Resilience)**, NHS England
79. **NHS England Core Standards for Emergency Preparedness, Resilience and Response**, NHS England
80. **The Route Map to Business Continuity Management**, *Meeting the Requirements of ISO 22301*, John Sharp, (2012) British Standards Institute

Appendix 1 – The Business Continuity Management (BCM) Lifecycle

The BCM Lifecycle shows the stages of activity that an organisation moves through and repeats with the overall aim of improving organisational resilience.



Figure 1: The Business Continuity Management (BCM) Lifecycle
Source: BCI Good Practice Guidelines 2013

| Stage | Purpose |
|--|---|
| 1 Policy & Programme Management | The start of the Business Continuity Management (BCM) Lifecycle. It is the stage that defines the organisational policy relating to business continuity (BC) and how that policy will be implemented, controlled and validated through a BCM programme that is underpinned by BCM objectives. |
| 2 Analysis | The stage within the BCM Lifecycle that reviews and assesses the organisation in terms of what its key activities are, how it functions and the impacts of disruption to key activities. |
| 3 Design | The stage within the BCM Lifecycle that identifies and selects appropriate strategies and options to determine how continuity and recovery from disruption will be achieved. |
| 4 Implementation | The stage within the BCM Lifecycle the implements the agreed strategies and options through the process of developing Business Continuity Plans (BCP). |
| 5 Validation | The stage within the BCM Lifecycle that confirms the BCM programme meets objectives established from the BCM policy and that the organisation's BCPs are fit for purpose. |

Appendix 2 – Outline of Implementation Process for CCG Business Continuity Management Programme



BCM Lifestyle Stages

| | | | |
|-------------------------------------|--------------|-----------------------------------|----------------|
| (1) Policy and Programme Management | (2) Analysis | (3) Design and (4) Implementation | (5) Validation |
| (6) Embedding Business Continuity | | | |

Key Elements of BCM Programme Implementation Process

| Scoping Discussion | Presentation to Executive Management Team | BCM Initial Meeting | BCM Initial Meeting | BCM Exercise Meeting | Business Continuity Exercise |
|---|--|---|---|---|---|
| <ol style="list-style-type: none"> 1. Scope CCG BCM programme 2. Identify CCG BCM Champion 3. Draft a CCG BCM policy 4. Link with existing CCG Risk and Governance arrangements | <ol style="list-style-type: none"> 1. Gain CCG EMT approval for BCM policy 2. Agree schedule of BCM meetings 3. Share and raise awareness of BCM policy | <ol style="list-style-type: none"> 1. Agree BCM roles 2. Agree template BCM documents 3. Agree timeline and responsibilities for completion of BCM documents | <ol style="list-style-type: none"> 1. Review completed BCM documents 2. Agree any amendments to BCM documents 3. Share BCM documents with interested parties 4. Establish BC procedures and relevant training | <ol style="list-style-type: none"> 1. Establish BC exercise aim and objectives 2. Identify BC exercise roles and responsibilities 3. Agree date and details of BC exercise 4. Provide notification of BC exercise | <ol style="list-style-type: none"> 1. Deliver BC exercise 2. Identify learning and follow up actions from the BC exercise 3. Implement follow up actions and amend BCM documents as required |