The Highland Council	Agenda Item
	13
Resources Committee Meeting – 25ᵗʰ November 2015	Report No
	RES/ 103/15

General Business Continuity Plan (BCP)

Report by Director of Community Services

Summary

This report introduces the attached Council's Business Continuity Plan (BCP). This plan identifies key business activities delivered by Council Services. It has been prepared according to a methodology agreed by the Executive Leadership Team which identifies key activities which must be maintained against a range of timeframes. Services' BCPs form an integral part of the Council's overall General BCP. These plans have been approved by Services' respective committees. Any identified training for staff in the activation of the BCP will follow, as will testing and periodic review.

1.   Background

1.1   The General BCP has been drawn up in response to the requirements of the Civil Contingencies Act but it also represents good business practice. It seeks to identify how key activities will continue to be delivered during a major incident. The requirement to have a BCP is identified in the Council's Corporate Risk Register.

1.2   Key business activities were identified by working groups of managers in each of the Services. These Service managers prepared a risk matrix which identified and assessed the likelihood and impact of the loss of these activities. The risk scoring which followed allowed these teams to rank these risks and to prepare specific arrangements to mitigate them.

2.   Approach

2.1   As agreed by the Executive Leadership Team, the approach throughout has been to concentrate on consequences rather than trigger events, i.e. dealing with overall impacts rather than concentrating on a wide range of scenarios; for instance, key activities could be affected by a range of events that cause loss of staff (e.g. widespread illness, industrial action, severe weather) but loss of staff remains the outcome.

2.2   Business continuity planning has been a new activity for some managers and there was a need to assist the working groups, particularly in carrying out a business impact analysis. This element of the approach is fundamental in

identifying those key areas which are priorities for the business.

3. Monitoring and Performance Reporting

3.1 Progress in further development of the BCP will be monitored periodically by the Executive Leadership Team at no more than a quarterly interval and by Internal Audit at no more than an annual basis.

3.2 Individual Service BCPs have been accepted by their respective committees and are now an integral part of the Council's overall General BCP.

4. Implications

4.1 There are no Financial, Equalities, Rural or Carbon Clever impacts arising as a direct result of this report.

4.2 Resource and Risk implications are noted throughout the General BCP itself.

4.3 There is a follow-on time commitment required to meet training and exercising needs.

Recommendation

The Committee Council is asked to:

a) Approve the Council's General Business Continuity Plan.

Designation: Director of Community Services

Date: 10th November 2015

Author: Emergency Planning & Business Continuity Manager

HIGHLAND COUNCIL
GENERAL BUSINESS CONTINUITY PLAN

D J NORRIE EP & BC Manager Highland Council Signature: Date:	S BARRON Chief Executive Highland Council Signature: Date:
STATUS: For Council Approval Uncontrolled when printed Classification: **OFFICIAL** Revision Version: 1.5 Next Audit Review Date: October 2016	

<u>Distribution:</u>

<u>Internal:</u>

Chief Executive
Depute Chief Executive
Service Directors
Heads of Service
Senior Ward Managers
Local Service Managers
Corporate Communications Manager
Customer Services Manager

<u>References:</u>

A. The Civil Contingencies Act 2004:
   http://www.cabinetoffice.gov.uk/content/civil-contingencies-act

B. The Civil Contingencies Act 2004 (Contingency Planning) (Scotland) Regulations 2005
    http://www.legislation.gov.uk/ssi/2005/494/pdfs/ssi_20050494_en.pdf

C. Preparing Scotland – Scottish Guidance on Preparing for Emergencies:
   http://www.readyscotland.org/ready-government/preparing-scotland/

D. The Business Continuity Institute Good Practice Guide 2013:
   http://www.thebci.org/index.php/resources/the-good-practice-guidelines (Updated August 2014)

1. <u>THE STRUCTURE OF THIS PLAN</u>

1.1. This plan defines the framework within which detailed Service BCPs are contained and implemented. These Service BCPs form the bulk of this plan and are produced as Annexes to this plan.

1.2. The plan is based on continuing services which have been assessed and agreed as being the most critical to the community we serve. These have been defined as 'critical business areas' and the plan is built around safeguarding these activities and functions.

1.3. The Services' BCPs section specifies what steps will be taken in the event of a threat to the continuity of our business. They include our reliance on suppliers of services to the Council. Other sections of the plan cover co-ordination, executive control, responsibilities, decision making and communication.

1.4. The full list of topics that are covered by this plan is as follows:

   SECTION 2:   <u>Executive Control</u>. This section describes how executive management of the responses to a major business interruption will be conducted by the Council.

   SECTION 3:   <u>Local Arrangements</u>. This section deals with how the required levels of response identified in this plan will be notified down to those who deliver critical services.

   SECTION 4:   <u>Roles and Responsibilities</u>. This section describes the top level roles and responsibilities of the response Council's structure and emphasises the need for nominated deputes.

SECTION 5:   Planning Assumptions. To plan effectively it is necessary to understand the consequences that the plan must address. A range of generic consequences is described in this section and these have been used to assess business impacts in the Business Impact Analysis (BIA) process.

SECTION 6:   Critical Business Areas. This section describes the critical business areas and the length of time they can be interrupted without causing serious harm.

SECTION 7:   Framework for Strategic Decision Making. The framework for strategic decision making at the different UK alert levels is defined here. A general business continuity plan is also defined, and a number of general preparations and precautions are listed.

SECTION 8:   Service Business Continuity Plans. The baseline plan must be tailored to local circumstances and this section describes how this is done.

SECTION 9:   Testing. This section describes how testing and validation of the plan will be conducted.

SECTION 10:   Change Control and Formal Review. This section describes how configuration control will be applied to this document. It also describes how amendments can be suggested, and how they will be managed. Finally it lists the arrangements for periodic review of the plan.

2.   EXECUTIVE CONTROL

2.1.   Executive control of all Highland Council activities lies with the Council's Corporate Emergency Management Team (CEMT) which is chaired by the Chief Executive and consists of the Executive Leadership Team (ELT), or their representatives, and the Corporate Communications Manager. Operational control will be through the respective local managers and Ward Managers.

2.2.   The Council's Corporate Emergency Management Team (CEMT) is responsible for:

- Providing the policy-making and corporate management function for the duration of any major business interruption.
- Policy and structuring arrangements to deal with any long term consequences of any major business interruption.
- Financial control of all expenditure incurred, by Highland Council.
- Providing spokespersons to respond to requests from the media for interviews and information.
- Keeping Elected Members and Council staff fully informed.

2.3.   In the event of the business interruption being as a result of a wider major incident, the CEMT will need to assess how any decisions made by the Highlands & Islands Local Resilience Partnership (HILRP) might be implemented within the Council.

2.4.   Effective implementation of the Council's general business continuity plan will likely demand cross-Service working. This document provides a generic plan for the Council. Implementation of this plan is then organised on a Service basis through relevant managers (the Depute Chief Executive will take responsibility for Headquarters and the Service Centre). Service Directors will give support and advice to local managers in addition to their role on the CEMT.

2.5. There are many operational activities that are managed from Headquarters. In these instances Service Directors will control the activities of those staff to allow critical services to be safeguarded. Heads of Service who have responsibility for this kind of operational activity are to give support and advice to local managers. Normal deputising arrangements should apply.

2.6. The Chief Executive will ensure that Members are informed of the measures being taken across the Council. If necessary, local Members will be briefed on the activation of plans through the respective Ward Managers. If Members have any particular concerns over the measures being taken that cannot be answered locally, the Members are to be referred to the Chief Executive for advice.

2.7. An important aspect of management of the response to any serious business interruption will be communication with the public. All public notifications will be managed through the Corporate Communications Manager. Managers and staff are to refer all media enquiries to the Corporate Communications Manager. Day-to-day contact from the public will be through the Service Centre, Service Points and the website in the first instance.

2.8. Full implementation of the plan may mean changes to work patterns and roles of Council staff. These changes will be carried out in consultation with the Trade Unions. The Depute Chief Executive will inform Union officials at the stage when such changes are being introduced. Staff are expected to co-operate with these changes. Wherever possible, these changes will be pre-planned, on the basis of previous identification of suitable relief staff by Senior Ward and local Service Managers.

3. LOCAL ARRANGEMENTS FOR NOTIFICATION

3.1. Service Directors are expected to implement any arrangements for sustaining critical services as and when the local situation demands. Service Directors will keep the CEMT informed of the measures that have been actioned. Flexibility in the response must be maintained.

3.2. As it is likely that a major business interruption will cross boundaries, Service Directors will be responsible for co-ordinating and co-operating across these boundaries and will ensure that the CEMT is kept informed of any widespread issues that are receiving wider co-ordination.

4. ROLES AND RESPONSIBILITIES

4.1. The Chief Executive retains executive authority for the management and deployment of Council resources during a serious business interruption. The Chief Executive will exercise this authority through the CEMT.

4.2. Council Members may be invited to form an Emergency Committee, comprising 15 Members (including the Convenor and Leader of the Council's Administration) and would be politically balanced. This Emergency Committee will convene on an ad hoc basis to make decisions regarding the business interruption and to deal with urgent items of Council business. The Committee may be convened virtually, using on-line means and/or video conferencing. In all cases, the meetings will be minuted.

4.3. Council managers are likely to need relief at some stage in a protracted incident. For this reason, deputes need to be identified, and nominated, who will have full executive authority should the lead officer be unavailable.

4.4. It is the duty of all Service Managers to safeguard the delivery of critical services and activities as far as is feasible. Each Service has a number of critical services identified but co-operation and back-up from other Services is expected where necessary. Where there is a conflict of priorities, the Chief Executive will determine priorities.

5.   PLANNING ASSUMPTIONS

5.1.   This general business continuity plan aims to provide a framework for dealing with the following generic consequences of a major business interruption:

a.	Loss of Staff	- Extensive staff shortages, including staff with specialist skills.
b.	Loss of Buildings	- Including building denial and serious building damage.
c.	Loss of Communications	- Significant and prolonged disruption of communications.
d.	Loss of ICT	- Significant and prolonged disruption of ICT.
e.	Loss of Internet	- Inability to access remotely.
f.	Loss of Utilities	- Medium to long-term shortage of essential energy supplies.
g.	Loss of Internal Supplier	- Inability to provide critical services – interdependencies.
h.	Loss of External Supplier	- Breakdown or delay in external supply chains.
i.	Excess Demand	- Overwhelming demand placed upon specialist staff (e.g. EHOs).
j.	Loss of Critical or Sensitive Data	- Inability to access or which may result in non-compliance.
k.	Loss of Reputation	- Actions or inactions which attract significant public criticism.
l.	Loss of Compliance/Accreditation	- Including breaches of legal duties (not applicable to all services).

5.2.   It will be necessary to be flexible in our response, and to vary our response from day-to-day. Whilst the list above applies to all Services, there are a few impacts which are specific to individual Services because of the nature of their work.

5.3.   Notwithstanding our efforts, it is likely that for short periods of time the demands upon our services will exceed our ability to sustain all of the critical activities simultaneously. The Council's Corporate Emergency Management Team (CEMT) will make decisions on which critical activities will be given priority and, in consultation with local Service managers, will arrange for their implementation.

6.   CRITICAL BUSINESS AREAS

6.1.   Services have identified critical business areas within the Council, and have then grouped them according to how long they can be interrupted without causing serious harm. These time categories are:

- Must be sustained 24/7.
- Can be interrupted for up to 3 days.
- Can be interrupted for up to 7 days.

6.2.   These critical business areas are included in Annexes A to E in the form of Business Impact Analyses (BIAs). This information will be kept up to date by the review and re-issuing of the Annexes when required.

6.3.   Identification of an activity against a particular timescale does not imply that it is more important than those with longer timescales. The timescale merely serves to illustrate how speedy the initial response must be if the activity or service is likely to be interrupted.

6.4.   It follows that if an activity or service is not included in these lists, then delivery of that activity may be suspended to allow the critical activities and enablers to be sustained.

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7. FRAMEWORK FOR STRATEGIC DECISION MAKING

7.1. Whilst a myriad of local decisions will be taken as local responses are implemented, it is also necessary to establish the framework by which decisions will be taken at the strategic level. These will be necessary to determine what is to be done on the larger issues, such as the closure of schools.

7.2. The BIAs list the critical business activities/services that must be sustained. It is envisaged that the Council will keep its remaining activities and services going for as long as it can. However, there may well come a point where the Council will have to close down the non-critical activities because, for example:

- There are insufficient staff.
- The staff have been diverted to critical activities.
- Fuel shortages constrain normal service delivery.

7.3. These decisions will often be best made at a strategic level. Furthermore, the decisions may well be influenced by advice or direction from a national level.

7.4. Decisions will also have to be made about when and how activities and services should be re-started.

7.5. In the event of the business interruption being part of a larger major incident, the overall response will be discussed in the HILRP[1] forum. The Chief Executive will communicate any agreed decisions to the CEMT. However, as far as Council responsibilities are concerned, the Chief Executive, acting through the CEMT, is the executive authority. Acting on advice from the HILRP and national authorities, the CEMT will make and communicate to Service managers any necessary decisions and measures.

7.6. The CEMT may have a large range of issues to address and the following gives a flavour of some of the important considerations in preparation for and recovery from a major business interruption.

PREPARATORY CONSIDERATIONS
- Preparation, communication and maintenance of plans.
- Briefing of Members and staff.
- Training and authorisation of staff.
- Review of stock levels.
- Preparation and issue of communications.
- Review of plans.
- Review of preparedness.
- Liaison with HILRP member organisations.
- Briefing of Members and staff.
- Training and authorisation of staff.
- Increasing stock levels.

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[1] HILRP – Highlands and Islands Local Resilience Partnership. Under the Civil Contingencies Act (2004), Category 1 responders, such as Police, Fire and Rescue, Coastguard, SEPA , NHS Health boards and Local Authority services, are required to undertake multi-agency based risk assessments and to plan for the response to, and recovery from, events or situations which may constitute a 'major emergency'. The Highlands and Islands Local Resilience Partnership, or HILRP, is one of eight such strategic, or "GOLD Command" multi-agency groups in Scotland responsible for emergency planning, resilience and major emergency response and recovery. Each organisation within the HILRP is also responsible for contributing to warning and informing members of the public of potential risks and how they can be better prepared in the event of a major emergency.

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- Increasing planned maintenance.
- Preparation and issue of communications.

RECOVERY CONSIDERATIONS
- Liaison with HILRP member organisations.
- Briefing of Members and staff.
- Resumption of normal Council committee business.
- Resumption of routine meetings.
- Lifting of travel restrictions.
- Re-starting non-critical activities and services.
- Re-opening of schools.
- Re-opening of public buildings.
- Re-provisioning stock levels.

7.7. General Measures. Some general preparations and precautions are given in the remainder of this Section.

7.8. There are common themes that can be seen in the generic measures, and which arise in a number of different scenarios. Some of these are described below (but see also Para 5.1 above):

- Shortage of skilled staff. Measures are needed to substitute for missing staff who have critical skills. These may involve cross-training staff from other services; use of private-sector staff; use of voluntary agencies, etc.

- General shortage of staff. As above, but with the opportunity for greater flexibility in redeploying staff. There may well still be training requirements prior to redeployment.

- Loss of energy supplies. Measures are needed to cope with interruption to energy supplies, and these can include the use of alternative energies; stockpiling, etc.

- Breakdown of supply chains. Measures are needed that recognise that suppliers will also be affected by a major incident. These might include the use of alternative suppliers; raising of stock levels; installation of additional capacity, etc.

7.9. General Preparations and Precautions. There are certain preparations and precautions that are general and should be applied across the range of critical activities where appropriate. These may include:

- Home Working. Service Directors are to make maximum use of home working arrangements and these should be defined in their BCPs.

- Access to Buildings. Council buildings and other facilities may be required as a resource for other than their usual purposes. For this reason it is essential that Service managers maintain arrangements to allow access to and operation of the buildings and facilities 24/7.

- Flexible Working. It is expected that during a period of protracted severe weather staff will respond positively to requests to undertake work outwith their normal range of duties. Trade Unions will be consulted on arrangements.

- Use of Previously-Employed or Retired Staff. The need for specialist skills may result in the need to ask previously-employed or retired staff whether they are prepared to re-enter employment with the

Council to assist in sustaining critical services and activities.

- Voluntary Organisations. Where there is a likelihood of a shortage of care staff, the use of voluntary organisations should be considered and incorporated into Service plans where those organisations have agreed to provide support.

- Suppliers. Service managers should establish where possible that suppliers also have contingency plans in place that will allow them to meet our needs.

7.10. ICT and Telephony. The Council has an increasing dependence on ICT and Telephony. Whilst there are separate Business Continuity (BC)/Disaster Recovery (DR) arrangements for this specialism, there is cross-over into this plan through individual service BCPs. ICT Services will provide advice and guidance to Services in relation to the ICT elements of their individual plans and may further review contractual DR Service once service plans are completed and when updated.

- ICT DR Plan. This plan applies in any situation where some or all of the applications or systems included in the contractual DR service based at the primary data centre are either lost or withdrawn and the backup service in the secondary data centre is required to be activated.

- DR Servers Capacity. The DR solution is designed to provide for the defined applications or systems with up to 10% of their standard user concurrency (i.e. **1**0% of the total number of users of that system or application. If there are BCP issues for Services which are very reliant on ICT and Telephony, then Services will need to decide which system functions are to be used and/or specific staff who will use them. Going beyond the 10% of their standard user concurrency will start to degrade the relevant DR Service which may eventually fail. The exception to this, due to its criticality, is Outlook (email), which is designed for 100% DR failover[2].

- Recovery of Interfaces. The DR Service does not include the recovery of interfaces between different systems or applications, although this can be requested. Recovery of interfaces will incur additional charges.

- Services' Business Priorities. Services must therefore identify clearly in their plans those elements of ICT which are critical to their business continuity arrangements. This information must also be passed to ICT Services to assist in defining business priorities for continued, but restricted, ICT operability. Without feedback to ICT Services, it would be difficult to assess changing priorities for DR Service.

8. SERVICES' BUSINESS CONTINUITY PLANS (BCPs)

8.1. The Services' BCPs provide the detail of how this plan and the generic contingency measures are applied and are maintained by the appropriate Service Director. The Council has robust but separate general response arrangements for major incidents in the form of the General Emergency Plan. Specific major incidents may require that both plans are invoked at the same time. In which case, there will be a need for the Council's collective response to be co-ordinated by Directors across a range of responses.

8.2. The Council's General BCP has been developed through a series of steps:

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[2] The exception to this, due to the criticality of the service, is Outlook (email). Data is mirrored in real time to two systems in different locations containing identical information for all email users. If one system fails, the other system activates seamlessly; a process which has been designed to cause no impact on the end user.

- Identification of which of our activities are business critical, and which are supporting activities.
- Grouping of these critical activities into those that must be sustained 24/7, or can be allowed to lapse for up to 3 days, or up to 7 days.
- Identification of the hazards that might cause us to be unable to deliver these critical activities. Hazards include shortage of staff, loss of telephones, etc.
- Development of generic measures that could be deployed to overcome the effects of these hazards if they occur.

8.3. These generic measures are developed into an action plan for dealing with each of the relevant hazards. Services' BCPs are detailed, with staff identified; contact details included; buildings identified; arrangements for access to buildings made and listed; suppliers contacted; and so forth. Each Service BCP becomes a part of the Council's General BCP.

8.4. These Service BCPs will include support from locally-based staff dedicated to operational activities that are usually organised and managed directly from Headquarters. In these instances, Directors will control the activities of those staff to allow critical services to be safeguarded. Directors will also liaise with local Service Managers and Senior Ward Managers appropriately. Heads of Service who have responsibility for this kind of operational activity will give support and advice to their respective Service Directors.

8.5. The Services' BCPs are based on a standard template and will be similar from Service to Service, differing only in the detail of how and where the critical activities will be sustained. Once completed, Service BCPs are reproduced as separate documents due to their size (please refer to Annexes A to E).

8.6. Any queries on any particular Service BCP should be referred to the appropriate Service Director.

8.7. Budget Cover. The Director of Finance will identify cost codes and subjectives to be used when incurring expenses directly caused by implementing this plan.

8.8. Emergency Expenditure. Service Directors are not to allow the maintenance of critical activities and services to be constrained on purely financial grounds. In accordance with the Council's Financial Regulations (June 2014), the Chief Executive has the following delegated powers in respect of expenditure of an emergency nature:

9.4.1 To authorise expenditure of an urgent/emergency nature in consultation with the Director of Finance, provided that the expenditure is reported to the first available meeting of the appropriate Committee.

9.4.2 To take such immediate action, as may be necessary, to protect the interests of the Council in relation to:
- *Emergencies arising from industrial action*
- *Any other emergency which, in the opinion of the Chief Executive, in consultation with the appropriate officers and elected Members, requires such action.*

8.9. Recovery. In the event that there are significant recovery issues associated with the business interruption, the Council will need to form a Recovery Working Group. The Head of Environmental & Regulatory Services (with the assistance of the Environmental Health Manager) is the officer nominated to co-ordinate recovery on behalf of the Chief Executive. Reference in the first instance should be made to the HILRP Recovery Guidance Document.

9. TESTING

9.1. The Services' BCPs, along with their contingency measures, will be tested at regular intervals. The timing of tests will be at the discretion of Service Directors, but the time interval between tests should not exceed 12 months.

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9.2. In each case the responsibility for conducting the tests lies with each Service Director. They will be required to show that contingency measures are in place, are practicable, and that any necessary amendments have been made to keep them up to date. They may agree co-ordinated tests with their colleague Service Directors. They may also agree that tests should be limited to specific activities, provided that these restricted tests give a fair measure of the effectiveness of the overall plan.

9.3. Because of the nature of most of the critical activities, a physical test involving a reduction in service level will be impracticable. The expectation is therefore that tests will comprise a balanced mixture of table-top exercising and actual auditing. (*For example, if a contingency measure requires that certain staff should be trained in a new activity, then this can be validated by examining the training records for these people*).

9.4. To facilitate continuous improvement Service Directors will be expected to copy their test outcomes to the Chief Executive, the Executive Leadership Team, and to the plan author. Naturally, Service Directors are to seek to resolve any issues that arise from their testing.

10. CHANGE CONTROL

10.1. This plan is owned by the Chief Executive.

10.2. The Council's Emergency Planning & Business Continuity Manager is the author of the plan, and only this person may issue new versions of the plan. The author will ensure that all new versions are brought to the attention of all relevant staff.

10.3. Service Directors own their Service's BCP and are expected to maintain the detail of them to reflect, for example, changes in appointments or internal structures.

10.4. Council managers who perceive a need for change should contact the Council's Emergency Planning & Business Continuity Manager. Changes that would affect the plan significantly will require the authorisation of the Chief Executive.

ANNEXES

A. Corporate Development

Annex A - Corporate
Development Service

B. Finance

Annex B - Finance
Services Service BCP.

C. Development & Infrastructure

Annex C -
Development & Infras

D. Care & Learning

Annex D - Care &
Learning Service BCP

E. Community Services

Annex E -
Community Services S

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