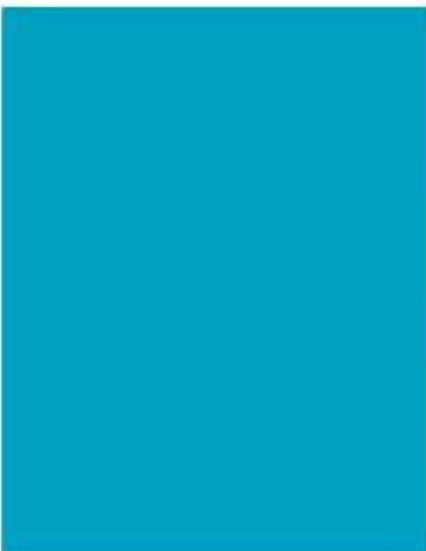


Business Continuity Policy



Business Continuity

Policy

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1 Introduction

NHS England must deliver an effective Business Continuity Management System (BCMS) in order to secure the best possible outcomes for patients and to successfully deliver the NHS England Business Plan 2013/14 – 2015/16 'Putting Patients First'. NHS England recognises the potential operational and financial losses associated with a major service disruption, and the importance of maintaining viable recovery strategies. In addition, NHS England and external providers must comply with the Civil Contingencies Act (2004) in developing robust business continuity plans.

The Business Continuity Policy document defines the framework and implementation of the BCMS to minimise the impact of incidents.

A key element of a successful BCMS is embedding a strong business continuity culture throughout NHS England, endorsed by the NHS England Board.

The BCMS will have responsibility and accountability at National Director level. This will provide assurance that the BCMS is aligned to NHS England strategic objectives.

NHS England's business continuity objectives are to:

- Provide a framework for the development of a robust and consistent BCMS throughout NHS England.
- Identify and mitigate business continuity risk.
- To ensure that the BCMS provides planning, processes, training and continuous improvement to manage operational incidents throughout NHS England.
- Enable the successful delivery of the NHS England Business Plan.
- Promote and maintain the reputational integrity of NHS England.
- Meet the requirements of the Civil Contingencies Act (2004) and align to ISO business continuity requirements and guidelines.

2 Policy statement

NHS England 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 an incident.

This policy statement provides a framework for NHS England business continuity to follow in the event of an incident, such as fire, flood, bomb, staff absence, power and communication failure. It also states the process for implementing and maintaining a robust BCMS.

NHS England business continuity plans will be based on the following standards:

- NHS Commissioning Board Core Standards for Emergency Preparedness, Resilience and Response (EPRR).
- ISO 22301:2012 - Business Continuity Management Systems - Requirements.
- ISO / PAS 22399: 2007 - Guideline for Incident Preparedness and Operational Continuity Management.
- Recognised standards of corporate governance.

All Directors will ensure that nominated NHS England business continuity leads maintain business continuity management, including Business Continuity Plans, for prioritised activities within their area of responsibility. This will include assurance from external service providers.

All staff must be aware of the Business Continuity Plan (BCP) that affects their business areas and their individual role following invocation.

NHS England will implement a programme of BCMS training, exercise, maintenance and review to ensure the relevance of the BCM Strategy.

In addition, NHS England, through the National Support Centre Business Continuity team, will provide assurance to the Department of Health on progress with the BCMS.

3 Scope

Staff within the scope of this document

Staff of the following are within the scope of this document:

- NHS England, including:
 - National Teams;
 - Regional Teams;
 - Area Teams;
- Hosted bodies, including:
 - All Commissioning Support Units;
 - NHS Leadership Academy;
 - NHS Improving Quality.

4 Roles & responsibilities

4.1 National Director: Policy

The National Director: Policy has overall responsibility for the development and implementation of the BCMS within NHS England.

4.2 National, Regional, Area Directors and hosted bodies

National, Regional, Area Directors and hosted bodies have responsibility for:

- Appointing a Nominated lead for business continuity.
- Promoting the embodiment of the business continuity culture within NHS England.
- Implementation of the Business Continuity Policy.
- Developing the BCMS and reviewing business continuity standards within their area of responsibility.
- Provision of appropriate levels of resource and budget to achieve the required level of business continuity in response to incidents.
- Nominating Incident Managers and Incident Directors.
- Ensuring information governance standards continue to be applied to data and information during an incident.
- Providing assurance to the National Director: Policy on their business continuity management.

4.3 Business Continuity Management Team (National Support Centre)

The Business Continuity Management Team is responsible for:

- Providing assurance to the National Director: Policy and to the Department of Health on business continuity management.
- Providing direction and support to NHS England in business continuity development, training, exercise and delivery.
- The development, exercise, maintenance and review of the BCMS and the BCP for the National Support Centre.

- The management and recovery of any National Support Centre business continuity incident under the command and control of the nominated Incident Response Team.
- Reporting to the National Director: Policy on the NHS England BCMS.

4.4 **Business continuity nominated leads**

Business continuity and EPRR leads are to be closely aligned. The business continuity nominated leads will support their director through:

- The development, exercise, maintenance and review of the relevant Business Impact Analysis and BCPs.
- The management and recovery of relevant business continuity incidents under the command and control of the nominated Incident Response Team.
- Liaising with the National Support Centre on the NHS England BCMS.

4.5 **NHS England staff**

All NHS England staff are responsible for:

- Developing an awareness of BCM within their area of responsibility.
- Reporting in accordance with the relevant Incident Reporting and Management System for any business continuity incident.
- Understanding and contributing to business continuity incident and recovery plans within their area of responsibility, including the specific roles and responsibilities allocated.
- Developing business continuity standards within their own area of responsibility with the support of the National Support Centre.

5 **Business continuity plan**

A BCP will be produced for those areas listed within the scope of this policy. The BCP will be based on the following processes:

- Business Impact Analysis (BIA)

- Risk Assessments
- Identification of Prioritised Activities and Continuity Requirements

6 Business continuity incident

6.1 Robust procedures should be detailed within the BCP for the following priority incidents as a minimum. The potential impact of incidents will be assessed through appropriate risk analysis:

- Unavailability of premises for a period that significantly impacts prioritised activities caused by fire, flood or other incidents;
- Significant numbers of staff prevented from reaching NHS England premises, or getting home due to severe weather or transport issues;
- Major electronic attacks or severe disruption to the IT network, systems and mobile telephony;
- Terrorist attack or threat affecting transport networks or office locations;
- Denial of access to key resources, assets, utilities and fuel supply;
- Theft or criminal damage severely compromising the organisation's physical assets;
- Significant chemical contamination of the working environment;
- Serious injury to, or death of, staff whilst in the offices;
- Illness/epidemic striking the population and affecting a significant number of staff;
- Outbreak of a serious disease or illness in the working environment;
- Simultaneous resignation or loss of a number of key staff;
- Widespread industrial action;
- Significant fraud, sabotage or other malicious acts;
- Violent incidents affecting staff.

6.2 Incident Response Structure.

The Incident Response Structure will be defined within the BCP and resourced to ensure procedures facilitate response and recovery from an incident. This should include the following:

- Incident Reporting and Management System.

The BCP is to detail procedures for incident reporting and management to facilitate effective command and control.

- Incident analysis, management and recovery.

Business continuity leads will support and provide guidance to the designated Incident Response Team, as detailed in the BCP.

- Command Centre.

Facilities are to be identified to enable effective management of an incident. The Incident Manager will coordinate operations from the designated location.

Incident Managers and business continuity nominated leads will retain copies of the BCP for effective incident management.

7 Communications strategy

7.1 Business continuity awareness will be developed through NHS England communications.

7.2 Effective communication is essential at a time of crisis. A communications strategy will be defined within the BCP, defining appropriate guidelines for internal and external communication processes in the event of an incident.

7.3 New or variations to legal, regulatory and other business continuity requirements shall be communicated to affected staff and areas.

8 Exercising, maintaining and reviewing BCM

BCPs are to be exercised, reviewed and updated at regular intervals to determine whether any changes are required to procedures or responsibilities.

9 Distribution & Implementation

9.1 Distribution Plan

This document will be made available to all staff via the NHS England internet site. A link to this document will be provided from the Policy Directorate intranet site.

9.2 Training plan

The National Support Centre will identify levels of training and awareness facilitation for NHS England business continuity leads and staff to ensure that a strong business continuity culture is embedded within NHS England. This will improve the organisation's resilience to the effects of incidents.

10 Monitoring

10.1 Compliance

Compliance with the policies and procedures laid down in this document will be monitored by the National Support Centre, together with independent reviews. Non-compliance will be reviewed to determine corrective action.

The Director of Corporate Development, in conjunction with the Head of Corporate Operations, is responsible for the monitoring, revision and updating of this document.

10.2 Equality impact assessment

This document forms part of NHS England's commitment to create a positive culture of respect for all staff and service users. The intention is to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and value the diversity of all individuals and communities.

As part of its development this document and its impact on equality has been analysed and no detriment identified.

11 Associated & reference documentation

11.1 Associated documents

- NHS England Business Continuity Management Strategy.

11.2 Reference documents

- Civil Contingencies Act 2004.
- ISO 22301:2012 – Business Continuity Management Systems Requirements.
- ISO 22313:2012 – Business Continuity Management Systems Guidance.
- ISO / PAS 22399:2007 – Guideline for Incident Preparedness and Operational Continuity Management.
- NHS Commissioning Board Business Continuity Framework.
- NHS Commissioning Board Core Standards for Emergency Preparedness, Resilience and Response (EPRR).
- NHS England Business Continuity Management Toolkit.
- NHS England Risk Management Policy and Procedure.
- PAS 2015:2010 Framework for Health Services Resilience.

Appendix 1 Version control tracker

Version Number	Date	Author Title	Status	Comment/Reason for Issue/Approving Body
V01.00	Aug 2013	Business Management & Continuity Senior Manager	Approved	Updated Business Continuity Policy

Appendix 2 Definitions

Unless a contrary intention is evident or the context requires otherwise, words or expressions contained in this document shall have the same meaning as set out in the National Health Service Act 2006 and the Health & Social Care Act 2012 or in any secondary legislation made under the National Health Service Act 2006 and the Health & Social Care Act 2012 and the following defined terms shall have the specific meanings given to them below:

Board	means the Chair, Executive Members and Non-executive Members of NHS England collectively as a body.
Budget	means a resource, expressed in financial terms, proposed by the Board for the purpose of carrying out, for a specific period, any or all of the functions of NHS England.
Business Continuity	Means capability of the organization to continue delivery of products or services at acceptable predefined levels following a disruptive incident.
Business Continuity Management (BCM)	Means a holistic management process that identifies potential threats to an organization and the impacts to business operations those threats, if realized, might cause, and which provides a framework for building organizational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities.
Business Continuity Management System (BCMS)	Means part of the overall management system that establishes, implements, operates, monitors, reviews, maintains and improves business continuity. NOTE The management system includes organizational structure, policies, planning activities, responsibilities, procedures, processes and resources.
Business Continuity Plan (BCP)	Means documented procedures that guide organizations to respond, recover, resume, and restore to a pre-defined level of operation following disruption. NOTE Typically this covers resources, services and activities required to ensure the continuity of critical business functions.
Business Continuity Programme	means an ongoing management and governance process supported by top management and appropriately resourced to implement and maintain business continuity management.
Business Impact Analysis (BIA)	means a process of analysing activities and the effect that a business disruption might have upon them.
Executive Member	means a Member of the Board who is appointed under paragraph 3 of Schedule A1 of

the NHS Act 2006.

Incident	means a situation that might be, or could lead to, a disruption, loss, emergency or crisis.
National Director	means an Executive Member or other Officer of NHS England who reports directly to the Chief Executive.
NHS England	means NHS Commissioning Board.
Nominated Officer	means an Officer charged with the responsibility for discharging a specific task within SOs and/or SFIs.
Prioritised Activities	activities to which priority must be given following an incident in order to mitigate impacts. NOTE Terms in common use to describe activities within this group include: critical, essential, vital, urgent and key.
Risk Assessment	overall process of risk identification, risk analysis and risk evaluation.
SFI	means Standing Financial Instruction.
SO	means Standing Order.