



Surrey Downs Clinical Commissioning Group

Business Continuity Management Policy

Policy ID	CG04
Version:	1.1
Date ratified by Executive Committee	13/01/15
Author	Governing Body Secretary
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Next review date:	21/08/16

Version History

V1.0	25/10/13	First draft, as amended by Executive Committee
V1.1	09/12/14	Revised based on 2013/14 experiences and advice from internal audit report on business continuity specifically that the policy should be “tailored to local arrangements, for example through providing more detail on areas such as business impact analysis, testing of the Business Continuity Plan, and the way in which the effectiveness of the policy will be monitored”.

EQUALITY STATEMENT

Surrey Downs Clinical Commissioning Group (Surrey Downs CCG) aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. It takes into account the Human Rights Act 1998 and promotes equal opportunities for all. This document has been assessed to ensure that no-one receives less favourable treatment on grounds of their gender, sexual orientation, marital status, race, religion, age, ethnic origin, nationality, or disability.

Members of staff, volunteers or members of the public may request assistance with this policy if they have particular needs. If the requesting person has language difficulties and difficulty in understanding this policy, the use of an interpreter will be considered.

Surrey Downs CCG embraces the four staff pledges in the NHS Constitution. This policy is consistent with these pledges.

EQUALITY ANALYSIS

This policy has been subject to an Equality Analysis, the outcome of which is recorded below.

		Yes, No or N/A	Comments
1.	Does the document/guidance affect one group less or more favourably than another on the basis of:		
	Gender (Men and Women)	No	
	Race (All Racial Groups)	No	
	Disability (Mental, Physical and Carers of Disabled people)	No	
	Religion or Belief	No	
	Sexual Orientation (Heterosexual, Homosexual and Bisexual)	No	
	Pregnancy and Maternity	No	
	Marital Status (Married and Civil Partnerships)	No	
	Transgender	No	
	Age(People of all ages)	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there any exceptions valid, legal and/or	N/A	

	justifiable?		
4.	Is the impact of the document/guidance likely to be negative?	N/A	
5.	If so, can the impact be avoided?	N/A	
6.	What alternative is there to achieving the document/guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	

For advice in respect of answering the above questions, please contact the Corporate Office, Surrey Downs CCG. If you have identified a potential discriminatory impact of this procedural document, please contact as above.

Names and Organisation of Individuals who carried out the Assessment	Date of the Assessment
Kate Taylor, Service Redesign Manager	27/01/14
Justin Dix, Governing Body Secretary	

1. Introduction

1.1. Business Continuity Management (BCM) is an established set of processes to mitigate the risk of interruption to the Surrey Downs CCG's services in the event of a disruption to normal operations. These disruptions may be attributable to a number of factors that the CCG has a greater or lesser degree of control over such as severe weather, loss of utilities, IT system failures or the loss of key staff through pandemic illness.

2. References

2.1. This policy has been guided by Section 7 of NHS England's "Business Continuity Management Framework (service resilience)".

<http://www.england.nhs.uk/wp-content/uploads/2013/01/bus-cont-frame.pdf>

This policy has not been updated nationally at the time of writing.

3. Definitions

3.1. Business Continuity Management or BCM is an organization-wide discipline and a complete set of processes that identifies potential impacts which threaten an organization. It provides a capability for an effective response that safeguards the interests of its major stakeholders and reputation.

4. Purpose and scope

The aim of this policy is to:

- 4.1. Enable the CCG to anticipate, prepare for, prevent, respond to and recover from disruptions, whatever their source and whatever part of the business they affect.
- 4.2. To identify critical functions and maintain these during a disruption, allowing the delivery of services to continue whilst recovery is in progress.
- 4.3. Fulfil the CCG's responsibilities as a Category 2 organisation as defined by the Civil Contingencies Act, and as an NHS body with responsibilities to its public, its partner organisations and its staff.

5. Duties

5.1. The document applies to the activities of NHS Surrey Downs CCG. Any staff directly employed by, or contracted to work for NHS Surrey Downs CCG are covered. This includes staff employed by Commissioning Support Units who are expected to abide by the CCG's Business Continuity Policies or highlight any issues where these may not be consistent with CSU policies. Business Continuity for CSU staff will reside within the associated function e.g. contracting, business intelligence Integration of business continuity arrangements rests with the CCG team completing their business continuity template.

5.2. The process of BCM is owned by the whole organisation, and is led by the Governing Body which acknowledges the need for sound BCM arrangements.

5.3. The NHS Surrey Downs CCG BCM Policy will be implemented through all departments of the organisation and premises it operates from.

6. Target audience

6.1. Each function of NHS Surrey Downs CCG has responsibility for managing its own business risk and business continuity arrangements. These are brought together under this corporate Business Continuity Policy and Action Plan which establishes how the Executive Officers and Senior Managers will oversee the response to, and recovery from, any business interruptions.

6.2. The person with senior level responsibility for BCM is the Chief Operating Officer.

6.3. Designated leads in each function are responsible for delivering the information required for the function's business continuity plan as set out below.

6.4. NHS Surrey Downs CCG will use functional level Business Continuity Plans to undertake a business impact analysis at departmental level to determine which are its critical services and functions and to identify the Recovery Time Objectives for each. The Business Impact Analysis will also identify key stakeholders for each activity.

6.5. The Business Impact Analysis and Business Continuity Plan will be reviewed at regular intervals, particularly during high risk periods such as winter, to ensure that they continue to reflect the organisation's needs.

6.6. The Business Continuity Plan will be tested at regular intervals and training will be provided to staff where required to ensure that disruptions can be responded to effectively.

7. Policy Specific Roles and Responsibilities

Area	Description	Lead	NHSE Ref
7.1. Planning	Maintenance of a viable policy and plan	Executive Business Manager	7.4, 7.6, 7.8. 7.14
7.2. Leadership and assurance	Assurance of the overall strategic direction of Business Continuity Management across NHS Surrey Downs CCG. Commitment to making sure that the Business Continuity Management Policy is resourced and enforced.	Governing Body	7.1
7.3. Executive Leadership	Undertake leadership and sponsorship of the Business Continuity Management framework under the direction of the Governing Body.	Chief Operating Officer	7.22
7.4. Delivery	Act as a point of tactical leadership. Liaise with Heads of Service to ensure that agreed actions are taken in each team.	Executive Business Manager	
7.5. Legal responsibilities	Ensure that the CCG discharges its legal responsibilities to the public and other stakeholders	Governing Body Secretary	7.5
7.6. Management of control room arrangements	Eg premises, utilities, IT, equipment	Executive Business Manager	7.3, 7.24
7.7. Resourcing	Make sure that there are suitable financial resources for Business Continuity Management	Chief Finance Officer	7.1
7.8. Benchmarking against national toolkits	Ensure that the planning process takes into account nationally available toolkits that are seen as good practice.	Executive Business Manager	7.10
7.9. Finance	Set out how finances and unexpected spending will be covered, and how unique cost centres and budget codes can be made available to track costs	Chief Finance Officer	7.2
7.10. Use of external contractors	Use of external contractors to be made available in severe circumstances	Chief Finance Officer	7.25
7.11. Reporting	Manage, monitor and report on the progress of the Business Continuity Management System as required	Executive Business Manager	
7.12. Delegated leadership	Nominate one manager/staff member (Departmental Business Continuity Lead) who will have specific responsibility for business continuity in their department	Heads of Service	
7.13. Local analysis	Undertake a Business Impact Analysis for their team	Departmental Business Continuity Lead	7.15
7.14. Recovery	Prepare a Recovery Plan for critical services in their department/	Departmental Business Continuity Lead	7.4, 7.15
7.15. Public awareness	Ensure that where appropriate, sections of Business Continuity Plans and Policy are published and accessible to the public.	Head of Communications	7.7
7.16. Staff awareness	Ensure that the Business Continuity Plan and other supporting information is	Head of Communications	7.7

	available on the staff intranet site and will actively be promoted to both new starters as part of the induction process and also for existing staff.		
7.17. Training	Identifying the need for training and for all NHS Surrey Downs CCG staff to ensure business continuity becomes part of organisational culture and daily business routines, improving the organisation's resilience to the effects of business disruptions.	Executive Business Manager	7.9
7.18. Testing	Responsibility for ensuring regular tests and revisions are made to all plans to ensure they provide the level of assurance required.	Executive Business Manager	7.17
7.19. Refresh and audit	Ensuring that the Business Continuity Policy and Plan is reviewed and updated at regular intervals to determine whether any changes are required to procedures or responsibilities.	Executive Business Manager	7.9
7.20. Risk	Ensure that the risks associated with business continuity are identified and mitigated, based on worst case scenarios	Executive Business Manager / Governing Body Secretary	7.11, 7.12, 7.13, 7.16
7.21. Alert and Escalation Procedures	Ensure system resilience actions are in place	Director of Commissioning and Strategy	7.18, 7.19, 7.20, 7.21, 7.22, 7.23
7.22. Insurance	Ensure that indemnity / insurance arrangements are in place where possible	Governing Body Secretary	7.26
7.23. Mutual aid arrangements	Mutual aid with other organisations e.g. if loss of premises is an issue	Executive Assistant	7.23

8. Local arrangements

- 8.1. The Executive Assistant is the lead for Business Continuity and will undertake the following actions to ensure that local responses are in place:
- 8.1.1. Ensure that the other tenants and the landlords work together to ensure a consistent response to building issues, such as use of flood barriers, loss of utilities, security issues, fire safety arrangements, fire safety testing, maintenance of the building to minimise foreseeable building issues etc.
 - 8.1.2. Work with tenants in common security suppliers (Securitas) to liaise over actual or potential business continuity issues.
 - 8.1.3. Work with the supplier of the CCG's IT systems to ensure that in the event of loss of IT, systems will be restored within specified periods and that staff are aware of other options e.g. use of web based NHS mail to maintain essential business functions.

- 8.1.4. Work with external bodies such as the environment agency e.g. to monitor flood alerts
- 8.1.5. Identify staff within the organisation who can provide on-site responses to potential business continuity issues.
- 8.1.6. Maintain on-call arrangements.
- 8.1.7. Have plans in place for the maintenance of telecommunications in the event of a business continuity exercise
- 8.1.8. Support the development of related policies and procedures such as the adverse weather policy
- 8.1.9. Provide staff training and communications materials in relation to business continuity.
- 8.1.10. Ensure heads of service maintain their team Based Business Continuity response sheets
- 8.1.11. Undertake lessons learnt exercises following a business continuity incident and routinely following each winter period.
- 8.1.12. Ensure the Executive is kept appraised of any potential threats to business continuity.
- 8.1.13. Ensure that significant risks are on the CCG risk register.

9. Document Control including archiving arrangements

- 9.1. This is a live document. The document controller is the Executive Assistant who will liaise with the Governing Body Secretary to maintain the policy.

10. Monitoring Compliance

- 10.1. This policy will be monitored by the Executive Committee.

11. Appendices

- 11.1. Departmental Business Continuity Plans as at 13.01.15