

Open Report on behalf of Pete Moore, Executive Director Finance and Public Protection

Report to:	Audit Committee
Date:	23 July 2018
Subject:	Business Continuity Management

Summary:

Business Continuity Management (BCM) was highlighted with lower assurance as part of the Finance and Public Protection Combined Assurance Status Report presented to the Audit Committee in January 2018. This report seeks to update member of the committee on progress made by the Emergency Planning and Business Continuity Service since this report was published and to inform them of work still outstanding.

Recommendation(s):

That members of the committee note progress made since January 2018 and are aware of the work still outstanding.

Background

A Business Continuity Management Programme is the on-going management and governance process supported by senior management and appropriately resourced to ensure that the necessary steps are taken to identify the impact of potential losses, maintain viable recovery strategies and plans, and ensures continuity of products and services through training, exercising, maintenance and review.

A Business Continuity Management System (BCMS) is that part of the overall management system that establishes, implements, monitors, reviews, maintains and improves business continuity. The management system includes organisational structure, policies, planning activities, responsibilities, procedures, processes and resources.

In 2004, the Civil Contingencies Act was introduced to ensure that the UK had appropriate plans in place for civil protection. A BCMS is a vital component of this plan. The Act identified organisations, which provide vital frontline public services such as local authorities, as Category 1 Responders and placed a legal responsibility upon them to establish BCM within their organisations. These responsibilities are reflected in the Business Continuity Policy.

In 2016, the restructured Emergency Planning Unit took on responsibility for corporate business continuity co-ordination for the County Council and was renamed the Emergency Planning and Business Continuity Service, the service completed further training aligned to the Business Continuity Institute's Good Practice Guidelines and ISO 22301 principles and began a fundamental review of the existing BCMS arrangements for the Council. Whilst that provision was fit for purpose, documentation and practices were predominantly based upon the old BS25999 standard which was replaced by ISO 22301 in May 2012.

The review of BCMS has been partially delayed due to the service being required to respond to an unprecedented amount of emergencies and unplanned events over the last twelve months, (checks required from the Grenfell Tower incident, dealing with IT outages and a governance review of the LRF requested by the Chief Constable). This has had an impact on both core business and the review resulting in lower assurance because of the amount of work still outstanding.

2. Progress

Work and review on BCMS at LCC continues and improvements are continually being made. As part of the overall review, work has taken place and continues to review core documents / templates to produce a suite of documents. Of particular relevance, this includes the following in line with the Business Continuity Institute BCMS lifecycle stages.

Analysis tools (forming the foundation / first stage of a BCMS cycle)

As would be expected this stage includes risk assessments and business impact analysis and is quite paperwork heavy, this process has taken some time to complete. Most critical service areas have now completed these with EP & BC service liaison officers but there are some service areas that still require review. This was due to the EPBCO service liaison officer for those particular areas being on long term sick and ultimately leaving the service, recruitment is currently underway.

Collaborative Working

Recommendations from both the malware and audit reports have stated that more emphasis and work should be undertaken with critical stakeholders, suppliers and commissioned services to ensure that they have adequate BCMS in place and that plans are regularly tested alongside LCC's plans. Effective partnership working and plan / system integration is therefore essential. The EP & BC service are currently working on wording regarding BC that can be incorporated into future contracts, some examples already exist and it is hoped that this can be further developed with the assistance of procurement and legal services for inclusion in all future contracts of this nature.

It is also important that these service suppliers are included and invited to participate in all of LCC's critical service area plan exercises. This will ensure that teams and organisations get to know each other and that all parties understand each other's roles, responsibilities, requirements, operating procedures and

limitations. Outcomes from these exercises will also identify any gaps in planning and unrealistic expectations.

The service now attends Facilities Management meetings along with IMT, LCC Property and relevant contractors. This ensures relevant BC risks are more transparent and linked into the corporate picture of LCC's critical services.

The Lincolnshire Resilience Forum (LRF) have also recently formed a multi-agency business continuity group predominantly looking to share planning and good practice across organisations, learn lessons from previous incidents and exercises and to identify any supplier interdependencies. The service provides both the management and project support officer for this group.

Implementation Tools

A more streamlined corporate business continuity plan (BCP) template has now been developed which will replace existing plans currently in use. Improvements are aimed at making this more action plan focused. Background information has been removed and put into other documents. The new plan template has been consulted on and approved through the LCC Business Continuity Steering Group. Our EPBCO's have started rolling this out to all LCC critical services. This roll out is in its early stages but it should be noted that all critical services already have BCPs and are being supported in adopting the new template. It is hoped that this template will be more comprehensive than the previous. Most of the template is intuitive and includes notes for deletion once complete. A separate guidance document has been produced to assist completion.

BC Awareness Training

In January this year all EP & BC Service officers took the Certificate of the Business Continuity Institute (CBCI) examination and I'm pleased to report that all passed ensuring that all officers have now obtained an industry recognised qualification.

A standard training package providing a basic overview of business continuity has now been produced in the form of a presentation session for EPBCO's to present at service team meetings etc. This is in addition to the LCC BC e-learning package on Lincs2 Learn.

Corporate BCP

This document is the last to be reviewed as part of the process and as per other documents, is likely to change significantly in design and content. It is hoped this will be complete by the end of 2018.

Corporate Communications Plan

The service has been working with the LCC communications team and has drafted a Corporate Communication plan following lessons learned during incidents. Since the start of the BCMS review, communications have improved both between services in activation, during incident response and collaborative working and also to staff.

The communications team now utilise a text system to message key managers. Further collaborative work is taking place to incorporate Business Support into this plan. Many organisations use expensive companies to provide an incident response communication service, LCC have resourcefully & innovatively used existing structures and tools to improve incident communications. A central fax list of existing hardware faxes has also been collated following lessons learned from LCC's and other organisational cyber-attacks.

Validation

Existing policy states that all LCC critical service BC plans will be exercised once per year. At present, there are 24 critical service area plans, all with their own varying number of critical activities.

This exercise schedule was an area that was criticised in the last audit report as it was not being achieved. With reductions in staff, this would have been even more difficult to achieve going forward and so it has been agreed with the Director of Finance & Public Protection that each critical service plan will be exercised at least once every three years. This schedule is more realistically achievable and is in line with the frequency for exercising LRF and LCC Emergency Plans. It is proposed that those plans exercised longest ago should be first on the new schedule and that a three year exercise cycle is published to enable both the EP & BC Service and critical service areas to factor into future work programmes.

An exercising package has been designed and is being rolled out via the EPBCO's to all LCC critical service areas. The initial package focuses on the loss of staff risk but further scenarios are currently being designed to address other risks including loss of supplier, loss of utility, loss of IT and loss of premises. The roll out has begun but is in its early stages. The service will be attending CMB in August to promote the agenda of BCMS and encourage critical service leads to get an exercise booked in with the team.

The Corporate business continuity plan is due to be validated this year; this will take the form of a table top exercise and will predominantly involve members of the LCC business continuity steering group. Scenarios are currently being prepared and the exercise will take place in December.

LCC took part in a BC exercise run via Resilience Direct in May 2018. This was effectively a corporate BC exercise involving most critical services and strategic commanders, run via email and facilitated by the EP & BC service. This exercise took place at short notice which provided greater assurance for audit purposes.

Recommendations from this exercise will go to CMB for their attention.

It should also be noted that the business continuity e-learning package available on Lincs2Learn has been reviewed, updated and relaunched. All LCC strategic and tactical officers, critical service plan owners and any other key staff have been invited to complete this new training to add to their existing competencies and portfolios and to improve their service resilience.

LCC experienced a significant IT outage in August 2017. It is fair to say that response and communication has improved on previous incidents. A debrief report was produced following debriefs and the recommendations are being monitored via the LCC business continuity steering group. A copy of this report can be found using the link below.

<http://imp.lincolnshire.gov.uk/livelink/livelink.exe?func=ll&objId=43905258&objAction=browse&viewType=1>

Policy and Programme Management

The existing LCC business continuity policy document is due review and will be completed this year alongside the corporate BCP review. This will require senior management approval and consultation and will be presented to CMB once complete.

All revised documents have now been published on LCC Resilience Direct pages and George and can be viewed using the link below.

<http://george/section.asp?docid=61538&ovt=1>

Conclusion

Although the BCMS review has fallen behind schedule due to the reasons stated above much work has taken place since January. LCC have been required to implement its business continuity plans and procedures on several occasions in response to threats and incidents. The new procedures and plans co-ordinated through the EP & BC service and managed by the business continuity steering group have stood up well to these tests and have been further developed as a result of debriefs and lessons learned. It should be expected that this will be the case in the future as more threats are realised.

BCMS documentation is progressing well with most critical service's risk assessments and business impacts assessments now complete, those that are not will shortly be picked up with the appointment of a new EPBCO. The new corporate plan template will continue to be rolled out throughout this year and the corporate BCP and policy statement completed as well.

The training and exercise schedule will be further developed and critical services invited to participate in events facilitated by the EP & BC service. Liaison with

partner agencies and suppliers will continue to be developed through participation in LRF working groups and inclusion in exercises and training events.

LCC BMCS is a major piece of work included in the EP & BC service plan 2018 -19 and it should be expected that a substantial assurance level can be evidenced by the end of the year. There is much confidence in existing systems already and as stated above, these have been validated on several occasions over the last six months. The outstanding tasks are to ensure that BCMS paperwork has all been completed for audit purposes and to further develop training and exercising to validate BCP's and procedures, this will be an ongoing process.

Consultation

a) Have Risks and Impact Analysis been carried out??

No

b) Risks and Impact Analysis

Any changes to services, policies and projects are subject to an equality impact analysis. The considerations of the contents and subsequent decisions are all taken with regard to existing policies.

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

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