

NHS Gloucestershire Clinical Commissioning Group Business Continuity Strategy

Document Control

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Author	A Ewens (Emergency Planning and Business Continuity Officer)
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Revision Date	Version No	Summary of Change	Changes made by	Authorised by
19.2.15	1	Review and updating to bring in line with current BCM principles	Andy Ewens	M. Andrews-Evans
12.1.16	1.1	Reviewed following PWC Audit	Andy Ewens	M. A-E

Plan Management

This plan is maintained by the Emergency Planning and Business Continuity Officer (EP&BCO) at Gloucestershire Clinical Commissioning Group.

Exercising

Specific areas to include-

- Decision to declare/mechanism for notifying partners of 'Business Continuity incident'
- Organisational command, control and coordination arrangements for single/multiple site incidents, in light of regional and national response structures
- Mobilisation/command of all staff within the CCG
- Identification of mutual aid requirements and mechanism for requests
- Welfare considerations for all staff-at scene/additional sites
- Protection of the CCG reputation

Date	Exercise Name	Description
24.11.15	Exercise Laithwaite	Live Play BCM Exercise

Associated Plans

Gloucestershire CCG Business Continuity Plan and Departmental Critical Function Analyses
Gloucestershire LRF Major Incident Procedures Manual
Gloucestershire LRF Humanitarian Assistance Guide
Gloucestershire LRF Mass Fatalities Plan
Gloucestershire LRF Emergency Mortuary Plan
Gloucestershire LRF Recovery Plan
Gloucestershire LRF Warning and Informing Plan

Freedom of Information Act Statement

This document outlines the current capabilities and vulnerabilities for Gloucestershire Local Resilience Forum (LRF) in its mass casualty response capability and capacity. It is therefore not suitable for public release under the Freedom of Information Act (FOIA) as to do so would be detrimental to the effectiveness and security of LRF partners.

Record of Amendments

Version	Date	Nature of Amendment / Remarks
Draft	AUG 13	Initial draft
1/13 v.1	12.09.13	Approved 29.08.2013
1	19.2.15	Updated – Andy Ewens
1.1	12.1.16	Update – Andy Ewens

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1.0 Introduction

The role of Gloucestershire Clinical Commissioning Group (GCCG) is to commission healthcare, both directly and indirectly, so that publicly funded healthcare providers secure the best possible outcomes for patients. In doing so, the GCCG will seek to meet the objectives prescribed in the mandate and to uphold the NHS Constitution.

The GCCG recognises the potential operational, reputational and financial losses associated with a significant service interruption, and the importance of maintaining viable recovery strategies.

All NHS organisations are required to maintain a good standard of preparedness to respond safely and effectively to a full spectrum of threats, hazards and disruptive events. These range from pandemic flu, mass casualty, potential terrorist incidents, severe weather, chemical, biological, radiological and nuclear incidents, fuel and supplies disruption and public health incidents.’
(NHS Operating Framework 2012/2013)

GCCG seeks to ensure that the highest level of services to patients is maintained during any interruption to clinical or non-clinical procedures, medical services or the infrastructure of facilities. Whilst the Civil Contingencies Act identifies the organisation as a ‘Category 2 Responder’ there is a statutory requirement for the organisation, as a provider of NHS services, to ensure that it has effective business continuity plans in place to manage any disruptions to the delivery of its services.

Business Continuity Management (BCM) is an essential component of Emergency Preparedness Resilience and Response (EPRR). It ensures there is capability to provide and maintain an effective response to any significant incident. It links to and contributes to effective Risk Management whilst supporting sound Corporate Governance by GCCG.

It is important for all staff within the CCG to be cognisant of Business continuity Management Systems, to take ownership of those functions within their remit and regularly review and maintain their own, their team and their organisational issues within the planning process.

The CCG Business Continuity Strategy and Plans area available to all employees of the CCG through CCG Live the on line intranet.

2.0 Aim

The aim is to establish a Business Continuity Management System which will:

Ensure that the organisation is aligned with good practice and appropriate guidance of ISO 22301 and ISO (PAS) 22399

3.0 Objectives

The objectives of this Strategy are to:

- Explain what BCM is
- Identify the BCM lifecycle and elements of the planning process
- Identify management procedures to prevent or minimise a disruption to service delivery
- Implement a BCM System within GCCG
- Provide details regarding incident management and command and control arrangements
- Detail how the organisation will provide support to areas affected by providing appropriate management and support
- Identify the process for developing individual team/service/department BCM Plans

4.0 Business Continuity Management

4.1 WHAT IS BUSINESS CONTINUITY MANAGEMENT

Business continuity is the agreed process to ensure the continuation of critical functions in the event of a significant incident.

Business Continuity Management is a process that:

- Identifies and manages current and future threats to a business
- Takes a proactive approach to minimising the impact of incidents
- Provides a framework for building organisational resilience
- Keeps critical functions up and running during times of crises
- Minimises downtime during incidents and improves recovery time
- Demonstrates resilience to stakeholders and suppliers.
- Protects reputation and brand.

Business Continuity Management must become embedded into the way the organisation plans and manages activities.

It is recognised that a disruption to internal services provision could escalate, resulting in the organisation requiring the support of other emergency responders.

4.2 BUSINESS CONTINUITY MANAGEMENT LIFECYCLE

The Business Continuity Management lifecycle is a series of activities which collectively cover all aspects and phases of the business continuity management programme. See figure 1:

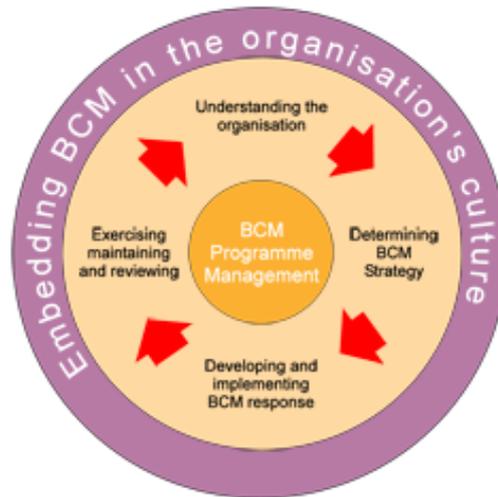


Figure 1

Business Continuity Management Toolkit – HM Government

4.3 UNDERSTANDING THE ORGANISATION

This involves gaining a full understanding of the services we provide and identifying key activities and staff required to maintain critical and essential services. This process starts with identifying service provision or processes where any failure, e.g. of equipment, suppliers, etc., would lead to a significant interruption. The main internal and external threats that the organisation faces need to be identified, their impact calculated and risk assessed. Once the threats are established, the resources are identified that are needed to ensure critical services are maintained.

In order to develop BCM Plans staff need to understand the services provided across the organisation. This would include identifying critical functions or services, the effect of those functions being disrupted and the priority for returning to normality.

Irrespective of the disruption, BCM needs to cater for the loss or unavailability of the following:

- People
- Premises and utilities
- Technology
- Information

- Supplies
- Transport
- Stakeholders.

4.4 DETERMINING THE OPTIONS (STRATEGY)

GCCG will consider strategic options for its critical activities and the resources that each activity will require on its resumption. The most appropriate strategy or strategies will depend on a range of factors such as:

- The maximum tolerable period of disruption of the critical activity
- The costs of implementing a strategy or strategies, and
- The consequences of inaction.

The organisation must agree which services are 'critical' to be maintained and have plans in place to ensure service delivery is maintained for the first 24 hours, followed by procedures to continue for three days and then seven days. Further disruption may need to be managed in accordance with those services and type of disruption.

Members of the Incident Management Team must have the information, authority and knowledge to be able to assess the situation, confirm the priorities and decide on the appropriate course of action, which may include invoking the appropriate BCM plans.

4.5 DEVELOP AND IMPLEMENT A BUSINESS CONTINUITY MANAGEMENT RESPONSE

The organisation will ensure a defined incident response structure is in place to enable an effective response and recovery from disruptions.

The GCCG will make sure that arrangements are in place to ensure that disruptions can be managed within specialist individual areas, services or teams. Each critical service will ensure they have a local business continuity plan in place.

The Incident Management Team would enable the organisation to:

- Confirm the nature and extent of the incident
- Take control of the situation
- Contain the incident, and
- Communicate with stakeholders.

The Incident Management Team should assess risks that might affect ability to deliver services and consider how both clinical and non-clinical provision can be maintained, regardless of the type of disruption. This can be achieved by identifying a list of all known risks or hazards which may threaten service provision. The risk should be rated, which will help inform what may need to be done to minimise or respond to the risk.

The following describe strategies that could be adopted:

- Tolerate (Do nothing)
- Transfer (Change, transfer or end the process)
- Treat (Insure)
- Mitigate (Take steps to soften the impact).

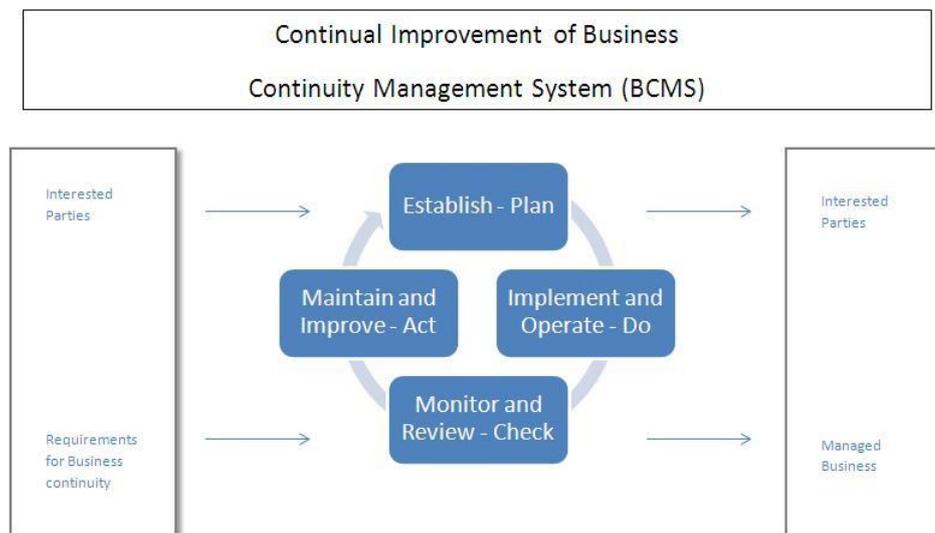
Any significant risks that have been identified as part of this process should be incorporated into the organisation’s risk register.

4.6 MAINTAINING, EXERCISING AND TESTING

These are essential processes to ensure that procedures and BCM arrangements remain current and fit for purpose. Regular testing of the processes, combined with an ongoing review of this strategy and BCM contingency plans is essential.

4.7 EMBEDDING A BUSINESS CONTINUITY MANAGEMENT CULTURE

Embedding a BCM Culture is a long-term activity aimed at ensuring BCM principles are adopted across the organisation and become part of the day-to-day planning of services and training.



ISO 22301 Societal Security – Business Continuity Management Systems – Requirements

Business continuity plans must be kept up-to-date, key staff provided with appropriate training and procedures validated through exercises and testing. The process will also include effectively managing the prioritisation of services and ensuring resilience of key providers and suppliers.

5.0 Roles and Responsibilities

5.1 Corporate responsibility

The Strategy does not change the responsibilities of the Board, which has ultimate responsibility for management of GCCG.

5.2 Implementing strategy

The governing body Accountable Emergency Officer (Executive Nurse) is responsible for implementing this strategy and establishing a BCM System within GCCG.

The Accountable Emergency Officer will ensure that a corporate BCM Plan incorporating departmental Critical Function Analyses is developed and maintained.

5.3 Management and departmental support

The Accountable Emergency Officer will be supported by the EPRR lead manager for GCCG and the Emergency Planning and Business Continuity Officer.

Each member of staff, team, service and department manager is responsible for maintaining individual services and implementing BCM within their team. They will develop and maintain service or departmental BCM Plans.

Where a service is contracted out, or is dependent on external providers or suppliers, it is the responsibility of the manager of that service to ensure continuity arrangements are in place. Therefore, appropriate managers need to ensure that providers, suppliers and contractors have robust BCM Plans in place to provide and maintain contracted services.

All staff will contribute to the development of their service or departmental BCM Plan. They will ensure that they are familiar with the plan and their role and responsibilities in implementing it.

6.0 Significant or Escalating Internal Incident

Any disruption to service delivery has the potential to escalate into an internal incident that may require the organisation to invoke the Major Incident Plan. A major incident is any occurrence that cannot be dealt with by routine management arrangements alone.

Once a potential disruption to service delivery has been identified the Senior On Call Manager will invoke an appropriate management response commensurate with the incident. This may require a formal major incident to be declared or internal escalation management procedures to be put in place. An example of what this management support might look like follows:

7 Management support

Provision of support for first 24 hours

In hours – Managers and appropriate staff will assess the incident and take appropriate action based on relevant business continuity plans. They will inform the Senior On Call or On Call Manager of the incident, actions taken, and progress of the incident.

Out of hours –take appropriate action based on relevant business continuity plans.

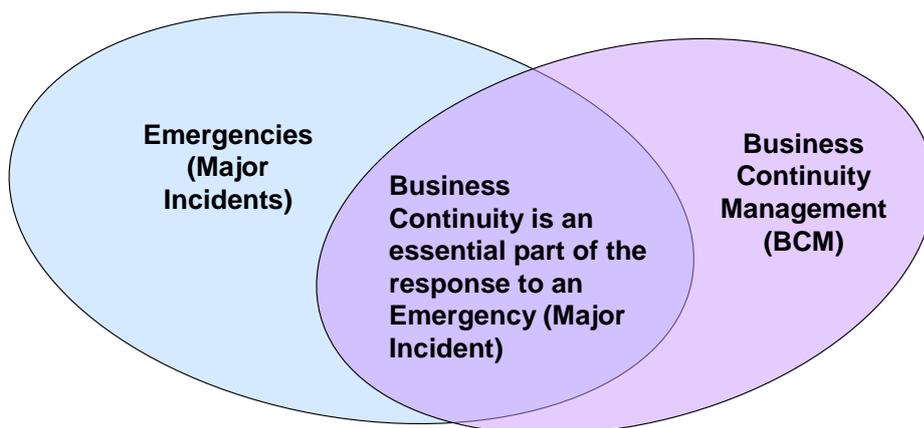
If this were to continue for three to seven days the approach would be a planned approach by an appropriate level Incident Management Team.

7.1 Managing longer term incident (i.e. Pandemic Flu)

Any incident lasting seven days or longer could lead the Incident Management Team to consider whether to escalate to declare a major incident and whether this needs to extend to include support from the Local Resilience Forum in accordance with contingency plans already developed.

Although Major Incident and Business Continuity Management are two separate work streams, they must have the ability to quickly interact with each other. Sound BCM ensures there is capability to provide and maintain an effective response to a major incident.

Major Incident and Business Continuity Management Planning Interaction



Note: An internal disruption to services may not be a major incident to external agencies

8.0 Training

Staff who may be required to become involved with BCM response will receive appropriate training to enable them to fulfil their management role and/or function. This training will include procedures outlined in Business Continuity Management Plans, 'Action Cards' and protocols detailed in individual risk assessments. Training for key staff will give assurance to the Board that staff are able to respond effectively to an incident.

All staff are made aware of BCM issues. Those not directly involved in the delivery of critical services need to understand what is expected of them to support the response to a disruption to services provision.

The Accountable Emergency Officer will ensure training needs are identified, training records compiled and the BCM planning lifecycle is maintained. Staff should receive training during induction and refresher training when changing appointment and when procedures are altered.

9.0 Testing, Maintenance and Practice

BCM procedures must be tested to demonstrate that they work and be reviewed in line with any lessons learned.

10.0 Document Reviews

All BCM Plans will be reviewed annually or earlier if required and evidence of reviews maintained.

11.0 Supporting Documentation/Guidance

The following documents were consulted and should be read in conjunction with this strategy.

The Civil Contingencies Act 2004

The Health and Social Care Act 2012

NHS Resilience and Business Continuity Management Guidance (Department of Health, 2008)

NHS EPRR documents and supporting materials including:

- NHS Emergency Planning Framework (2013)
- NHS Core Standards for Emergency Preparedness, Resilience and Response (EPRR)
- NHS Business Continuity Management Framework

BS: ISO 22301 Societal Security – Business Continuity Management Systems – Requirements

Business Continuity Management Toolkit – HM Government

BSI PAS: 2015 – Framework for Health Services Resilience

Gloucestershire Local Resilience Forum Major Incident Strategic and Tactical Plans

Gloucestershire Local Resilience Forum Pandemic Flu Plan

Gloucestershire Local Resilience Forum Severe Weather plan 2014

Gloucestershire Local Health Resilience Partnership: Health Community Response Plan

GCCG Major Incident Plan