Haringey Council
Business Continuity Policy

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Policy author:	Business Continuity Programme Manager

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1. Introduction

Business Continuity Management is a process that helps to identify, manage, and mitigate risks to ensure that the priority activities and processes of the Council can be maintained in the event of a disruption.

This policy sets out the approach that Haringey Council will take to planning for, and responding to business continuity disruptions, covering both internal and external incidents.

This policy is intended to provide the organisation and its partners with assurance that Haringey Council is meeting its obligations under the CCA (Civil Contingencies Act) 2014 and ISO 22301 in regard to business continuity.

This policy has been developed with close regard to ISO 22301, the Business Continuity Management standard, and the Business Continuity Institute's Good Practice Guidelines 2018.

1.1. Aim

To develop, implement and maintain an effective Business Continuity (BC) Management system (BCMS) across Haringey Council to enable services to:

- Develop a corporate strategy to manage corporate business continuity risks.
- Identify local actions to maintain or recover their priority activities or processes in the event of a disruptive event.
- Develop a Corporate strategy to respond to and recover from business continuity incidents.

1.2. Objectives

The objective of the Haringey BCMS is to reduce the impact of a business disruption or disaster, enabling essential services to continue to be delivered to local residents and businesses. To do this the BCMS will:

- Provide a framework for the development, implementation, and monitoring of an effective BC management Programme.
- Identify, assess, minimise and mitigate business continuity risk.
- Raise awareness of business continuity and the interdependencies between services and stakeholders.
- Establish business continuity procedures throughout the organisation to address planning, processes, response, and continuous improvement to manage disruptions that may affect the Councils priority activities and support the delivery of the corporate objectives.
- Develop appropriate training and testing based on the business continuity procedures to ensure that staff with a role in preparedness and response are competent and confident.
- Align with International Standard for Business Continuity, BS ISO 22101:2012 and its guidance BS ISO 22313: 2012.
- Provide assurance to residents and partners.
- To support local businesses and supporting organisations in developing their own effective business continuity plans

2. Scope

This policy applies to all Council service areas of the London Borough of Haringey.

This policy does not intend to replace or supersede existing relevant polices or planning (e.g., the Haringey Emergency Management Plan or the Haringey Corporate Risk Policy etc.). Rather, it advocates the use of existing risk registers and incident response mechanisms and will link closely with emergency preparedness activities and planning, where appropriate.

2.1. Haringey Business Continuity Management System (BCMS)

Haringey has a two-tier BC management system comprising of:

- The overarching corporate BC plan that sets out the corporate strategy to enable the Council to respond to large-scale business disruptions.

- Service-level business continuity plans set out the operational arrangements that can be activated in response to local operational and tactical level incidents.

This business continuity system is scalable, enabling an individual service to manage low-level disruptions whilst also providing a strategic framework for the Council to manage disruptions that affect the whole organisation. Business Continuity Plans will be developed with regard to ISO22301 best practice and from industry standards.

All Business Continuity Policies, Plans and Procedures will be reviewed annually or in line with major changes to ISO220301 best practice, upon invocation, or when significant changes occur which effect the organisation and its delivery or services. Where changes are made these will be communicated with all relevant staff and partner organisations. Once changes are made plans and policies should be submitted to the Resilience Emergency Planning Board for review and then signed off formally by the appropriate internal governance groups.

3. Key Service Areas

This policy applies to all Haringey Council Services and staff.

Each service will develop and maintain their own service BC Plan. Services will determine their own scope, based on the activities and processes identified as priority through their own business impact assessment (BIA).

Service BC Plans will contain a set of recovery actions which detail how the service will mitigate risk and maintain and/or recover critical and priority activities or processes in the event of a disruption. Activities, products, assets and/or systems identified as dependencies will be considered for inclusion in the Corporate BC plan and corporate risk register.

Services may exclude parts of their operations that fall outside the scope of their BC plan provided that such exclusions do not negatively impact on the Council's ability to deliver its Corporate Objectives.

3.1. Digital and Cyber Resilience

Haringey Digital services are responsible for putting in place and maintaining appropriate procedures for the resilience and recovery of the ICT infrastructure and services including cyber security. It is the responsibility of Digital Services to maintain separate Digital response plans in addition to their own local BC plans. This includes a separate Digital incident escalation and management process.

Digital Services will:

- Lead the identification of organisational digital recovery needs
- Plan for the recovery of services in order of criticality Digital services will ensure digital and telephony services are recovered in an appropriate technical order. Ensuring services have a suitable environment to continue to work from.
- Plan to improve the resilience of services and reduce outage frequency and duration.

3.2. Buildings

The Corporate Landlord has the prime responsibility for the management, operation, and maintenance of space within the operational building portfolio. This is delivered through the Facilities Management Team.

Facilities Management is responsible for ensuring buildings are safe and fit for purpose. This is achieved through the delivery of "hard" facilities management services (e.g., electrical and mechanical), for services across the operational building portfolio plus "soft" (e.g., cleaning) facilities management services to some

(e.g. Administrative) buildings. The two teams combine to deliver an integrated Facilities Management service.

The Property Team manages the council's Commercial and Community buildings portfolio.

The Council will make full use of flexibility within its property portfolio to maintain priority functions of services and support business continuity. Where physical environment is key to the delivery of a priority activity or process (e.g., customer contact centre), the service will plan for alternative measures in their BC plans, and/or raise the requirement as a dependency in their BIA to ensure it is considered in the Corporate BC and Corporate Risk Register.

3.3. Third Parties

The Council acknowledges that it retains accountability for the performance and outcomes of the services it commissions through third parties. It is the responsibility of commissioners, contract managers and Legal Services to ensure that BC clauses are explicit and satisfactory within each outsourced service contract.

Haringey should ensure contracts with provider organisations contain relevant emergency preparedness, resilience (including business continuity and where applicable cyber security and Disaster Recovery) and response elements. This assurance will be undertaken during the procurement of services.

This includes Service Level Agreements and arrangements where the supplier may service multiple customers. In these cases, the services commissioning these agreements needs to undertake an assessment to ensure that the provider has the capacity and adequate resourcing to put plans in place particularly to cover short or no notice incidents, with recovery timescales that are acceptable to both the provider and commissioner.

As required Haringey will also audit, assess, and make recommendations to providers on their Business Continuity arrangements. Where third parties and suppliers are delivering critical activities and services such as Out of Hours functions, they should be involved within testing and exercising of the service level BC response plans.

4. Governance

4.1. Council Leadership Team (CLT)

The Council Leadership Team is accountable to the Chief Executive for monitoring and ensuring compliance with the statutory duties of the Council, including BC management arrangements. A report on BC compliance and risk will be issued quarterly for the attention of the board.

Where a service is non-compliant with BC requirements, the accountable Director or Assistant Director maybe requested to attend the Council Leadership Team for review.

4.2. Resilience and Emergency Planning Board

The Resilience and Emergency Planning Board (REPB) is a strategic board that ensures the effective performance of the BC management system. The aim of the group is to ensure the capacity of the organisation and the borough to anticipate, prepare for, respond to, and recover from incremental change and sudden disruptions, identifying opportunities for growth and resilience building.

The objectives of the group are:

- Provide strategic leadership and governance for emergency planning and resilience work.
- Ensure compliance across the organisation with the statutory responsibilities set out in the Civil Contingencies Act 2004
- Support the identification, assessment, and mitigation of community, environmental, health risks.
- Consult, sign off and promote understanding of Emergency and Business Continuity plans, protocols, and procedures.

- Support the review and implementation of lessons arising from incidents, exercises, and workshops.

The REPB is chaired by the Director of Placemaking & Housing and membership is comprised of lead officers representing services with a corporate role in the resilience of the ogranisation. The Emergency Planning and Resilience team act as secretariat to the board. For further information on the REPB please see the Terms of Reference for the group.

5. Standards and Guidance

Business Continuity is a statutory duty under the Civil Contingencies Act 2004.

The Haringey business continuity management procedures are be based on the following guidance and standards:

- ISO 22301 Business Continuity Management Systems
- Business Continuity Institute: Good Practice Guidance 2018
- ISO 27701 Information Security Systems

6. Roles and Responsibilities

6.1. Chief Executive

- The Chief Executive has overall accountability for the discharge of the Council's statutory duties, including Business Continuity.
- Holds responsibility for ensuring that the requirements of the BC Policy are met, and that sufficient financial and material resources are available to mitigate unacceptable risk. The Chief Executive delegates responsibility for monitoring business continuity compliance to the REPB.

6.2. Directors and Assistant Directors

Directors and Assistant Directors are accountable for the performance of the services for which they are responsible. In the context of BC management this means:

- Assess risks to their service delivery and take steps to increase resilience Providing direction to staff during a disruptive incident.
- Attend the REBP if required, in the event of an incident affecting their service area.
- Attend the Council Leadership Team if called for review.

6.3. Business Continuity Programme Manager

Business Continuity Programme Manager is the professional lead for the BC programme in the Council. They are responsible for:

- Providing BC guidance, advice, and assurance to business as usual, projects, contacts, third parties and during response to a disruptive incident
- Develop and coordinate the corporate BC programme and assess compliance against this policy.
- Manage corporate planning for identified corporate BC threats (e.g., fuel supply disruption)
- Review and audit service level BC plans for quality assurance.
- Collate and report to the REPB and Council Leadership Team on the status of BC management.

6.4. Heads of Service

Heads of Service will Lead and manage robust, safe and resilient services that deliver in challenging times, including maintaining accurate risk registers, business continuity plans and information asset registers.

6.5. Business Continuity Plan Owners

Heads of Service and Team Managers who are BC Plan Owners are responsible for ensuring their own BC plans are maintained to a good standard and that identified risks are appropriately managed and mitigated. They are responsible for:

- Leading and championing Business Continuity within their service area or team
- Overseeing the maintenance of their service and team BC plans
- Considering the risk of business continuity disruption to their service, and putting in place any reasonable preventative, mitigation or planning measures.
- Ensuring the awareness and understanding of local BC arrangements by their staff.
- Lead their service response group in the event of a disruption affecting the delivery of their priority activities, providing direction to officers, and reporting the BC management response group, as appropriate.
- Ensure contracts with suppliers of priority goods and/or services to the Council must include assurance that the supplier has suitable business continuity arrangements in place.

6.6. Directorate Business Continuity Links

The Emergency Planning and Resilience Team maintain a network of Directorate BC Links across all service areas, they are responsible for helping to maintain service BC plans, under direction of their respective BC leads. Their specific responsibilities include:

- Ensure a suitable service BC plan is in place and reviewed, updated, and submitted to the Emergency Planning and Resilience Team at least annually, or following its invocation.
- Participate in relevant training and exercises to validate the service BC plans.

6.7. All staff

All staff should be provided with the appropriate level of awareness of the BC arrangements for their team. For most staff, the key information they must be aware of includes:

- Contributing to service BIA and BC plans reviews and development
- Staff should report any service disruption to their manager as soon as possible.
- Maintain awareness of the BC plans that affects their teams / business areas and their individual role following invocation.
- Assisting with business continuity response and recovery following an incident

7. Plans and Procedures

Haringey maintains a full set of emergency plans and procedures documenting its response to emergency and business continuity incidents. These include:

- Haringey Corporate Business Continuity Plan
- Haringey Service Level Business Continuity Plans
- Emergency Management Plan
- Warning Informing and Alerting Plan
- Emergency Welfare Plan
- Recovery Management Plan

This Policy and all Haringey emergency and business continuity plans also adhere to a number of plans at a London level. Those most applicable to business continuity are listed here:

- London Resilience Pandemic Influenza Response Plan
- London Fuel Disruption Protocol and National Emergency Plan – Fuel
- London Water Supply Disruption Plan
- Power Outage and Telecoms Disruption Planning

7.1. Risk Assessment

Haringey Business Continuity Programme Manager will undertake a business continuity risk assessment to identify risks and issues that could impact on the operations of the organisation. Relevant risks will be added to the corporate risk register for management through the Haringey risk management strategy. This will be reviewed at least annually.

7.2. Business Impact Analysis

All services will undertake a process of Business Impact Analysis (BIA) to identify their critical services and activities, recovery timeframes and required recovery resources. The BIA information will form the basis for the Service BC plans. BIAs will be reviewed at least annually.

All information from the service BIAs will be complied into a Master BIA document. This will be used as an operational support tool for both strategic and tactical level incidents.

7.3. Corporate Business Continuity Plan

Haringey maintains a Corporate BC plan for responding to business disruptions. The plan is reviewed annually or in line with organisational developments and sets out:

- List of Critical Priority 1 Activities
- The command-and-control structures that will be put in place including Out of Hours Activation
- Roles and responsibilities
- Response and recovery activities for maintaining continuity of critical functions.
- Recovery activities

7.4. Service Business Continuity Plans

Reviewed annually or in line with organisational developments and sets out:

- Critical services and activities
- Key contacts and stakeholders
- Recovery actions and resources

7.5. Process Chart for the Haringey Business Continuity Management Process, based on ISO 22301:2019 and the Plan Do Check Act Improvement Cycle

Plan   **Do**   **Check**   **Act**

Context of the Organisation	Leadership	Planning	Support	Operation	Performance Evaluation	Improvement
Understanding of the Organisation	Management commitment	BC Risk management	Resources	Business Impact Analysis and	Monitoring, analysis and evaluation	Improvement and amendment action plans
Expectations of Residents and Partners	BC Policy	Setting Corporate BC objectives	Corporate Engagement	Corporate BC Plan	Internal audit	Set schedule for annual reviews.
Legal and Regulatory	Roles and responsibilities		Staff Awareness	Service and Team BC Recovery Plans	Management review	
Scope of the Organisation	Agreed Training expectations		Documented information	Digital Response Plans		
BC Management Processes				Exercising and testing		

8. Business Continuity Incidents

8.1. Business Continuity Incident Levels

1 **Routine**	A small-scale business continuity incident, typically, short-lived with localised impacts that can be managed using Service Level BC Plans and without extensive use of Council resources. Silver Group may be established to support coordination, command, and control
2 **Critical Incident**	A business continuity incident that requires invocation of the Haringey Corporate Business Continuity Plan and Service Business Continuity Plan(s). A full command structure would be established including a Council Silver (Tactical) and Gold Group (Strategic) to ensure a coordinated response. This type of incident will require extensive Council resources to respond but can be managed with Council resources (or with minimal supplementary mutual aid).
3 **Major Incident**	The incident requires a greater response than the Council is able to provide - mutual aid is required. It will require a multi-agency response and special arrangements to be implemented. This may also be in response to a regional or national emergency. Major Incident Declaration can only be declared via Duty Gold.

9. Training and Exercising

9.1. Training

Haringey has undertaken a training needs analysis and developed an exercise programme that sets out the detail of the delivery of training and exercises in regard to business continuity. This is set out in appendix 1. As an overview:

- Business Continuity leads will be provided with appropriate training for their role through the provision of workshops and training sessions.
- Supporting roles in the BC management programme will have necessary skills and competence levels identified to highlight relevant training requirements.
- Staff identified to undertake a role within the BC Incident Response Group will receive appropriate training to enable them to respond appropriately.

9.2. Exercising

The Haringey business continuity plans and procedures are to be exercised, reviewed, and updated at least annually to determine whether any changes are required. As a minimum the exercise programme should include:

- Business Continuity table top exercise – annually
- Live exercise – every 3 years

A detailed Exercising plan can be found in Appendix 2 of this Policy.

10. Continuous Organisational Development

As part of its commitment to continual development, Haringey undertake reviews of its response and procedures following major exercises or real incident responses. Where appropriate this may take place as part of a multi-agency process.

Haringey will maintain appropriate procedures for debriefing staff and identifying and acting on lessons. Lessons identified will be addressed through changes to policy, plan, and procedures and or staff training.

The BC programme Manager will be responsible for ensuring that this process takes place and that appropriate actions are included in the BC work programme.

11. Audit and Monitoring Criteria

Compliance with this policy will be monitored by the Emergency Planning and Resilience Team, together with independent reviews by both internal and external audit. Non-compliance will be reviewed to determine corrective actions. Assurance of the BC Programme will be undertaken quarterly In line with CLT updates.

All Business Continuity Policies, Plans and Procedures will be reviewed annually or in line with major changes to ISO220301 best practice, upon invocation, or when significant changes occur which effect the organisation and its delivery or services. Where changes are made these will be communicated with all relevant staff and partner organisations and where necessary, updated documents will be circulated.

Once changes are made plans and policies should be submitted to the Resilience Emergency Planning Board for review and then signed off formally by the appropriate internal governance groups.

The Resilience and Emergency Planning Board hold a log on lessons learned and ensure that recommendations are actioned appropriately by services.

12. Business Continuity Document Storage

- The Business Continuity Programme Manager will store all Business Continuity documents electronically on One Drive and in Monday.com.
- BC Plan Owners and key deputies are expected to store their service and team plans to ensure access in and out of office hours.

The following methods of storage are recommended:

- Electronic storage on One Drive.
- Secure off-network copy held.

13. Review

13.1. Next formal review

A review of this document will take place on the first anniversary of adoption and subsequently every 3 years until rescinded, superseded or following significant organisational change that impacts the Policy.

13.2. Latest version

The audience of this document should be aware that a physical copy may not be the latest version. The latest version, which supersedes all previous versions, is always available from the Emergency Planning and Resilience team.

Any member of staff with a responsibility under this policy should familiarise themselves periodically with the latest version and for complying with protocol requirements at all times.

13.3. Implementation and dissemination of document

Awareness of this policy and the Haringey business continuity programme will be promoted to Haringey staff by the Emergency Planning and Resilience Team and Business Continuity Leads**.**

14.Training Needs Analysis and Exercise Programme

14.1. Training Needs Analysis

Required by who?	Training Requirement	How provided
Haringey Gold and Silver Group	- BC management awareness – policy and plans in place. - BC management awareness – Haringey responsibilities - Awareness of the impact that a major incident could have upon the daily business of Haringey. - Activation of the BC management plan - Role of the Business Continuity Management Response Group - Recovery planning and processes	- Business Continuity Policy and Plan - Gold and Silver training session provided by Emergency Planning and Resilience Team - Tabletop type exercise - Frequency: annual
Emergency Planning and Resilience Team	- BC management awareness – policy and plans in place. - BC management awareness – Haringey responsibilities - Awareness of the impact that a major incident could have upon the daily business of Haringey. - Activation of the BC management plan - Role of the Business Continuity Management Response Group	- Business Continuity Policy and Plan - Training delivered by the BC Programme Manager - Involvement with exercises and staff training sessions.
Business Continuity Plan Owners	- BC management awareness – policy and plans in place. - BC management awareness – Haringey responsibilities - Awareness of the impact that a major incident could have upon the daily business of Haringey. - Role of the Business Continuity Management Response Group - Logging basics	- Business Continuity Policy, Corporate BC Plan and Service BC Plans - Business Continuity Policy and Plan - Training delivered by the BC Programme Manager - Involvement with exercises and staff training sessions
All staff	- BC management awareness – policy and plans in place. - BC management awareness – Haringey responsibilities	Policy and relevant service BC plans

14.2. Exercise Programme

Exercise/ Type	Frequency	Actions
Critical Service Business Continuity Plan	Annual rolling programme. Each Critical Service plan to be tested annually with a bespoke exercise supported by the Business Continuity Programme Manager	• Test effectiveness of identified recovery options. • Identify if critical activities are up to date and appropriate. • Identify accuracy of recovery plan details • Update and identify additional recovery or response actions. • Raise awareness for key staff. • Post Ex Report compiled which details key actions and recommendations. • Updates and changes fed back into the Service BC Plan
Non-Critical Service Business Continuity Plan	Annual rolling programme. Services to be given the Self-Assessment Exercise tool to be used to test Service BC plans during an appropriate team meeting	• Test effectiveness of identified recovery options. • Identify if critical activities are up to date and appropriate. • Identify accuracy of recovery plan details • Identify update needs. • Raise awareness for staff. • Updates and changes fed back into the Service BC Plan
Corporate BC management Plan test - table top	Annually	• Test incident identification, plan activation and command and control arrangements • Identify plan accuracy. • Identify update needs. • Provide simulation opportunity for BCIRG members. • Post Ex Report compiled which details key actions and recommendations. • Updates and changes fed back into the Corporate BC Plan
Corporate BC management Plan test – Live exercise	Every 3 years	• Test effectiveness of identified recovery options. • Enable staff to practice recovery options. • Identify issues or update needs. • Raise awareness of BC management
Cyber and Disaster Recovery	Coordinated by Digital	• Testing digital recovery process • Identifying update needs • Familiarising Digital Teams with recovery procedures