

Business Continuity Policy

Version	v1
Supersedes:	N/A – New Policy
Date Ratified by Board:	December 2019
Reference Number:	PC24POL129
Title & Department of originator:	Deputy Director of Urgent Care, Service Delivery
Title of responsible committee/department:	Service Delivery
Effective Date:	December 2019
Next Review date:	December 2020
Target audience:	All staff
Impact Assessment Date:	N/A
Summary	

Version	Date	Control Reason	Title of Accountable Person for this Version
v1	December 2019	New Policy	DD of Urgent Care
Reference Documents		Electronic Locations (Controlled Copy)	Location for Hard Copies
		Primary Care 24 Intranet / SOPs Clinical / Operations ... Delete as appropriate*	Policy File, Wavertree Headquarters
Consultation: Committees / Groups / Individual			Date
Policy Review Group, Board Committees			December 2019

Contents

1. PURPOSE.....3

2. SCOPE.....4

3. RESPONSIBILITIES4

4. PROCEDURE8

5. MONITORING AND COMPLIANCE.....9

6. TRAINING9

7. ASSOCIATED DOCUMENTS9

8. EQUALITIES AND HEALTH INEQUALITIES.....10

9. PERSONAL INFORMATION.....10

1. PURPOSE

Primary Care 24 (PC24) are committed to having in place robust business continuity systems and processes that reduce the possibility of interruption to the services we provide, or should such disruption occur, minimises the impact on our services users and staff enabling the service to return to routine operations as soon as possible.

The NHS needs to be able to plan for and respond to a wide range of incidents and emergencies that could affect health or patient care. These could be anything from severe weather to an infectious disease outbreak or a major transport accident.

NHS Trusts and providers of NHS funded care must therefore be able to maintain continuous levels in key services when faced with disruption from identified local risks such as severe weather, fuel or supply shortages or industrial action.

Disruptions can be caused by periods of severe pressure (for example, in winter), a long-term increase in demand for services, external emergencies and disasters, and internal system failures. Planning to tackle these effects goes way beyond the initial emergency response.

The main guidance for business continuity management is contained in:

- ISO 22301 Societal Security - Business Continuity Management Systems – Requirements
- ISO 22313 Societal Security - Business Continuity Management Systems – Guidance
- PAS 2015 - Framework for Health Services Resilience

2. SCOPE

The Business Continuity policy applies to all PC24 locations, operations and staff (temporary or permanent). All staff will be made aware of the policy via the business continuity leads of their area, and appropriate training provided for those with specific input or duties arising.

All individuals involved in the delivery of services on behalf of the PC24 shall be made aware of precautions and actions that they must take to underpin the achievement of the organisational aim and in preparation for, or during any period of disruption.

3. RESPONSIBILITIES

Chief Executive

The Chief Executive has overall responsibility and accountability for Business Continuity Management under the Civil Contingencies Act (2004).

The Board

The Board will hold the organisation to account for the delivery of the Business Continuity strategy and seek assurance that Business Continuity procedures in place are robust and reliable. The Board will monitor progress and ensure that the organisation is compliant with statutory Business Continuity duties.

Director of Service Delivery

As the organisation's Business Continuity Executive Lead, the Director of Service Delivery:

- Holds Executive level accountability for Business Continuity and is responsible for ensuring that the organisation has robust business continuity planning arrangements in place.
- Will develop the organisations Business Continuity Management Plan, improve standards of Business Continuity management across the organisation and provide leadership on specialist Business Continuity issues.

- Will coordinate larger Business Continuity training exercises internally and externally with multi-agency partners.

Executive Directors

All Executive Directors are responsible for the overseeing activities in relation to frontline service delivery if an incident occurs that impacts upon PC24's ability to provide these services. Executive Directors are to ensure appropriate time, resources and commitment are invested into Business Continuity management, training, exercises and raising the level of business continuity awareness within their areas.

Office Manager (HQ)

The Office Manager is responsible for ensuring that response procedures to foreseeable disruptions such as utility failures, fires and floods are documented, tested, reviewed, maintained and readily available.

The Office Manager will engage with departments during the creation of Business Impact Assessments and Business Continuity Plans and provide support as required.

Estates Managers (External Sites)

The Service/Practice Managers will liaise with external Estate Managers to ensure that all appropriate Health and Safety checks are completed routinely such as fire drills, fire alarm testing, and that the documentary evidence to support these is readily available.

Head of IM&T

The Head of IM&T is responsible for ensuring that the department's response procedures to foreseeable disruptions such as network outages are documented, tested, reviewed, maintained and readily available.

The IM&T department will engage with other departments during the creation of Business Impact Assessments and Business Continuity Plans and provide support as required.

The Head of IM&T also has responsibility for ensuring that timely and effective communication systems are in place to alert the Business Continuity Executive Lead and the wider organisation to incidents or forthcoming planned work that may cause Business Continuity disruptions.

During a Business Continuity disruption, the IM&T team will respond to the incident in a timely manner as required and ensure that they liaise effectively and regularly with the Business Continuity Executive Lead to keep them informed of developments, issues and timeframes for recovery.

Communications Manager

The communications manager will be responsible for producing and/or overseeing external communications and media statements resulting from an incident.

Key stakeholders for each service are identified within the relevant Business Continuity Action Cards.

Deputy/Associate Directors and Heads of Department/Services

Senior Managers have responsibility for ensuring that Business Continuity Plans are capable of maintaining minimal acceptable standards of service delivery and are in place for each department. Each department/service will carry out an annual review of Business Continuity Management and ensure that plans are exercised annually as a minimum and updated as appropriate.

Clinical Leads

Clinical Leads are key role models for effective Business Continuity Management and have responsibility for continuing to provide safe levels of care during

Business Continuity disruptions. They must work closely with senior managers to develop, test, review and maintain against service Business Continuity Plans.

Service/Practice Managers

Service/Practice Managers will:

- Attend meetings and training workshops related to Business Continuity as and when required.
- Identify and assist with the implementation control measures to minimise any risks identified.
- Raise awareness within their respective service areas.
- Provide advice on service interruptions through a process of risk assessments, impact analysis and resource implications.
- Attend and facilitate internal exercises to test plans.
- Liaise and work in support of the Business Continuity Executive Lead and Senior Managers.
- Support Senior Managers with the development of service related business continuity plans.
- Be responsible for ensuring that regular audits are carried out, to check Business Continuity equipment such as back up paper systems, contingency mobiles, contingency laptops, torches etc. are functional and accessible.

All Staff

All staff are expected to:

- Achieve an adequate level of general awareness regarding business continuity.
- Be aware of the contents of their own business areas disaster recovery plan and any specific role or responsibilities allocated.
- Participate actively in the business continuity programme where required.
- Ensure information governance standards continue to be applied to data and information during an incident.

4. PROCEDURE

PC24 provides a wide range of patient services for the local population and in the event of an emergency or business interruption, it is essential that corporate business functions which support our commissioned patient activities can be restored and maintained as soon as is practically possible.

In the event of an emergency or business interruption PC24 will endeavour to maintain patient services as close to the usual standard as is practically possible, however on occasion this may be unachievable. The necessary business functions of the organisation will therefore been identified, defined and prioritised using Business Impact Assessment.

Business Impact Assessment is the process of analysing organisational functions and determining the effect that a disruption might have upon them, and how effects vary over time. The aim of the business impact assessment is to ensure that the organisation has identified those functions that support its key services in advance of an incident, so that robust business continuity plans can be put into place for those identified critical functions.

Our BIA process:

- Defines the function and its supporting processes.
- Determines the impacts of a disruption.
- Defines the recovery time objectives.
- Determines the minimum resources needed to meet those objectives.
- Takes account of any statutory obligations or legal requirements.

5. MONITORING AND COMPLIANCE

The on-going practicality of the business continuity plan can only be determined through continual tests and improvements. The Business Continuity Executive Lead will be responsible for ensuring regular tests and revisions are made to the business continuity plan to ensure they provide the level of assurance required.

Exercises and tests will:

- Be based on appropriate scenarios that are well planned with clearly defined aims and objectives.
- Minimise the risk of disruption of operations.
- Produce post-exercise reports.
- Be conducted at planned intervals and when there are significant changes within the organisation or to the environment in which it operates.
- Aim to exercise and test our business continuity arrangements alongside partner NHS organisations, where practicable.
- Share lessons learned and post-exercise reports with all interested parties.

All real life business continuity incidents will be reviewed during a de-brief, taking account of the above to ensure opportunity is taken for any learning.

6. TRAINING

All staff will be offered appropriate relevant training based on their duties and responsibilities. Staff requiring support should speak to their line manager in the first instance.

7. ASSOCIATED DOCUMENTS

External Documents

- The Civil Contingencies Act 2004
- The Health and Social Care Act 2012

- NHS Emergency Planning Framework

Internal Documents

- IUC Business Continuity Action Cards
- Primary Care Business Continuity Action Cards
- Influenza Pandemic Action Cards
- Policy for Managing Incidents and Serious Incidents

8. EQUALITIES AND HEALTH INEQUALITIES

PC24 is committed to an environment that promotes equality and embraces diversity in its performance as an employer and service provider. It will adhere to legal and performance requirements and will mainstream equality and diversity principles through its policies, procedures and processes. This policy has been implemented with due regard to this commitment. To ensure that the implementation of this policy does not have an adverse impact in response to the requirements of the Equality Act 2010 this policy has been screened for relevance during the policy development process and a full equality impact analysis conducted where necessary. PC24 will take remedial action when necessary to address any unexpected or unwarranted disparities and monitor practice to ensure that this policy is fairly implemented.

9. PERSONAL INFORMATION

PC24 is committed to an environment that protects personal information aspects in the development of any policy. When proposing change there is a new requirement for policy writers to investigate when the personal information aspect of the policy complies with the data protection principles in Schedule 1 of the Data Protection Act 2018. All individuals with responsibility for reviewing/writing policies should consider Privacy Impact Assessment compliance.

This policy complies with the Data Protection Act 2018, therefore no Privacy Impact Assessment is necessary.