

NHS Central Manchester Clinical
Commissioning Group (CCG)

Business Continuity Management (BCM) Policy

Version 1.0

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REFERENCES

Good Practice Guidelines 2013, *A Guide to Global Good Practice in Business Continuity*, Business Continuity Institute

ISO 22301:2012, *Societal security – Business continuity management systems – Requirements*, International Organization for Standardization

ISO 22313:2012, *Societal security – Business continuity management systems – Guidance*, International Organization for Standardization

PAS 2015, *Framework for Health Services Resilience*, (2010) British Standards Institute

NHS England Emergency Preparedness Framework 2013, NHS England

NHS England Business Continuity Management Framework 2013 (Service Resilience), NHS England

NHS England Core Standards for Emergency Preparedness, Resilience and Response, NHS England

The Route Map to Business Continuity Management, *Meeting the Requirements of ISO 22301*, John Sharp, (2012) British Standards Institute

1. INTRODUCTION

1.1 Context

NHS Central Manchester Clinical Commissioning Group (CCG) has a leading role in ensuring that healthcare services are provided for the people of Central Manchester. Essentially, the role of the organisation is to buy in or commission services that meet the varying health needs of the local population. These services may be provided by NHS organisations, such as local NHS hospitals and Trusts, or other private and voluntary organisations.

Commissioning is a key function of the NHS and CCGs spend about 80% of the NHS annual budget. Given the key role that Central Manchester CCG plays within the local health system, it is important that the organisation is able to continue its activities in the face of situations that might be, or could lead to, disruption, loss, emergency or crisis.

Under the Civil Contingencies Act (2004), Clinical Commissioning Groups are identified as 'category two' responders. Although the Act places a lesser set of duties upon category two responders than it does upon 'category one' responders, Department of Health and NHS England expects NHS organisations to plan for and respond to incidents in the same way as category one responders¹.

Therefore, as well as seeking to maintain and protect its staff, stakeholders, reputation, information, sites, facilities and finances, Central Manchester CCG, as an NHS body, also needs to establish effective business continuity arrangements in order to meet the requirements of the national programme for [NHS resilience](#), under which NHS bodies must ensure they have in place appropriate incident response structures and business continuity plans.

1.2 Policy Aim

The aim of this policy is to provide a framework for the development and operation of a business continuity management programme for Central Manchester CCG. By implementing this policy, Central Manchester CCG will demonstrate its commitment to establishing, implementing, reviewing and continually improving business continuity management. The policy sets out the scope of the CCG's arrangements for business continuity management and describes the approach and operational activities (the BCM programme) that Central Manchester CCG will implement in order to develop, maintain and improve organisational readiness to respond to and recover from disruption.

In the past, organisations in the UK developed their business continuity management in line with BS25999. However, this standard has been replaced by ISO 22301 and this

¹ NHS England Core Standards for Emergency Preparedness, Resilience and Response

policy takes in to account the requirements of the revised international standard for business continuity.

1.3 Definitions

Table 1 below provides definitions of key terms used within this policy and in relation to Central Manchester CCG's business continuity arrangements.

<i>Table 1: Definitions</i>	
BC	Business continuity is the capability of the organisation to continue delivery of its products and services at acceptable levels following a disruptive incident.
BCM	Business continuity management is a holistic management process that provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of key stakeholders, reputation, brand and value-creating activities.
BCMP	A business continuity management programme is the ongoing management and governance process supported by top management and appropriately resourced to implement and maintain BCM.
BCP	A business continuity plan provides documented procedures that guide the organisation to respond, recover, resume and restore to a pre-defined level of operation following disruption.

(Source: ISO223012)

1.4 Benefits of Business Continuity Management

As well as allowing the organisation to fulfill its resilience requirements as an NHS body, implementation of BCM offers Central Manchester CCG a range of benefits:

- effective business continuity arrangements allow the CCG to continue to meet the needs and expectations of interested parties;
- a properly implemented business continuity management programme helps the organisation to identify areas of weakness, duplication and inefficiency, which can offer the CCG the opportunity to become more resilient and more cost-effective;
- correctly implemented, BCM promotes greater staff engagement in the successful running of the CCG as it involves CCG staff in the efforts to enhance the resilience of the organisation;
- BCM can also be seen as part of the CCG's efforts to fulfil its duty of care to employees, stakeholders and the wider community as it supports the organisation to discharge its duties and maintain employment throughout a period of disruption.

2. SCOPE OF CCG BUSINESS CONTINUITY MANAGEMENT

2.1 Priorities

By implementing and maintaining a business continuity management programme, Central Manchester CCG seeks to achieve the following priorities should a disruptive incident affect the CCG:

- protect the safety of people employed by or working with the CCG;
- maintain, recover, resume or restore the CCG's priority activities;
- protect the interests of CCG stakeholders;
- protect the CCG's finances, property, resources and reputation.

2.2 Disruptions

Central Manchester CCG's BCM policy seeks to address the following disruptions that may arise as a consequence of some form of incident, interruption or termination:

- **Loss of people** – A range of possible scenarios (e.g. industrial action, severe weather causing transport disruption/closures, an influenza pandemic) could cause the CCG to experience loss of key personnel, knowledge, skills, relationships or contacts
- **Loss of premises** – Fire, utility failure, civil disorder in a locality or a gas explosion are examples of scenarios that could lead to denial of access to buildings, facilities or accommodation and the inability to undertake CCG activities from a normal place of work
- **Loss of resources** – Resources that support the CCG's activities, such as IT hardware, IT systems and networks, databases, telephony or other equipment may suffer failure, theft or malicious damage
- **Loss of suppliers** – Third party providers of goods and services to Central Manchester CCG may experience disruption themselves or may suspend or cease operations for some reason (e.g. bankruptcy, fraud investigation, statutory breach)

2.3 Activities and Locations within Scope

This policy will apply to all activities that come under the operations of Central Manchester CCG as well as the activities of the City-wide Commissioning Team, members of which are employed by Central Manchester CCG. However, it is acknowledged that some CCG activities, owing to their more time sensitive nature, will be more susceptible than others to the impacts of a disruptive incident. Therefore, Central Manchester CCG will undertake analysis of its activities to establish the organisation's 'most urgent functions'. Initial business continuity efforts will be focused on these prioritised activities with other activities falling within scope of the BCM programme in due course. In this way, Central Manchester CCG will adopt the

'lifecycle' approach to business continuity as recommend by good practice, which will allow the organisation to continually improve its BCM arrangements.

This policy will be applicable to the main site utilised by Central Manchester CCG, that is Parkway Three in Parkway Business Centre and, for the City-wide Commissioning Team, Parkway One in Parkway Business Centre. All staff based within the CCG accommodation at Parkway Three and Parkway One, including those from other organisations such as staff from Greater Manchester Commissioning Support Unit, should make themselves familiar with the business continuity arrangements that are applicable to Parkway Three and Parkway One.

2.4 Exclusions

This policy does not extend to other organisations that share premises with Central Manchester CCG at Parkway Three and Parkway One. However, Central Manchester CCG may seek assurance about the business continuity of relevant third parties based in Parkway Three and Parkway One.

2.5 Interested Parties

Table 2 below provides a summary of individuals or organisations that have an interest in or may be affected by Central Manchester CCG's business continuity management. The needs and expectations of these interested parties will be taken in to account within the operation of the CCG's business continuity management programme. This policy will be made available to all interested parties.

<i>Table 2: Interested Parties</i>	
Interested party	Nature of interest in the CCG's BCMP
Other Clinical Commissioning Groups: South Manchester CCG, North Manchester CCG, Bury CCG, Oldham CCG, Heywood, Middleton and Rochdale CCG	Joint commissioners of city-wide health services
NHS England (Greater Manchester)	Assurance role in relation to CCG BCM
Local Authority: Manchester City Council	Partner agency in health and social care commissioning
NHS funded providers: Pennine Acute Trust, Central Manchester University Hospitals Foundation Trust, Salford Royal NHS Foundation Trust	Provider of health services commissioned by Central Manchester CCG
Greater Manchester Commissioning Support Unit	BCM advice and support provided by GMCSU Resilience Team
Key third party suppliers: Emerson Property Services; NHS Property Services (PropCo)	Landlord; estates and facilities provider
Other GM NHS commissioners and providers	Mutual aid arrangement to support NHS organisations

3. CCG APPROACH TO BUSINESS CONTINUITY MANAGEMENT

3.1 Principles

The following principles underpin Central Manchester CCG's BCM policy and are the norms to which the organisation aspires:

- to be successful, business continuity management must be introduced and supported by Central Manchester CCG's Executive Management Team;
- business continuity is part of everyone's job and must be integrated into core CCG business processes;
- those that undertake the activities delivered by Central Manchester CCG are best placed to understand the continuity requirements of those activities;
- Central Manchester CCG's business continuity management programme is a continually evolving process;
- when a business continuity event occurs, CCG staff may need to work in different ways and/or in different locations than they would normally;
- business continuity procedures will be sufficiently detailed and clear so that somebody other than the person(s) primarily responsible for the work can follow them;
- Central Manchester CCG will learn from business continuity events and disruptions;
- the CCG's business continuity management will integrate with the CCG's roles described within the health economy Incident Response Plan.

3.2 Guidelines

This policy has been developed with reference to the Business Continuity Institute Good Practice Guidelines 2013. Central Manchester CCG will operate a business continuity management programme that follows the 'lifecycle' described within the Good Practice Guidelines 2013 (see Appendix 01).

Central Manchester CCG will also take in to account the business continuity guidance and toolkits on business continuity issued by the NHS England Business Continuity Working Group, coordinated by the National Support Centre.

3.3 Standards

Central Manchester CCG will align its business continuity management arrangements with the requirements of the international standard for business continuity, ISO 22301. Implementation of this policy will allow Central Manchester CCG to demonstrate its commitment to meeting the CCG business continuity requirements set by NHS England within the Core Standards for emergency preparedness, resilience and response (EPRR)

3.4 BC Objectives

In order to implement and maintain an effective business continuity management programme, Central Manchester CCG will establish and communicate relevant business continuity (BC) objectives. These objectives will be consistent with this policy, be measurable, take into account applicable requirements and be monitored and updated as appropriate. Appendix 03 of this policy provides a template for and examples of BC objectives.

4. OPERATIONAL FRAMEWORK

4.1 Resources

In order to implement and sustain an effective business continuity management programme, Central Manchester CCG will ensure there are suitable financial and operational resources available to the programme. These will include the nomination of an appropriately senior CCG business continuity 'lead' and the approval by senior management for sufficient staff involvement in business continuity programme activities, such as business continuity plan preparation, testing and exercising.

4.2 Processes

Central Manchester CCG will implement appropriate processes for business continuity management to ensure that the organisation aligns with good practice and meets the relevant standards for business continuity. These processes will cover the full 'BCM Lifecycle' and will include the following:

- business impact analysis and risk assessment, taking into account worst case scenarios and the Greater Manchester Community Risk Register;
- identification of continuity strategies and options;
- development and implementation of a business continuity plan;
- integration with existing incident response protocols;
- training, testing and exercising of business continuity arrangements;
- embedding business continuity within core CCG business processes, including processes for communication and awareness.

As a minimum, processes such as testing and exercising of business continuity arrangements will be undertaken at least annually.

4.3 Documents

At the heart of Central Manchester CCG's business continuity management programme will be three key documents:

- **Business Continuity Management Policy:** (this document) identifies what the CCG intends to do about BCM and outlines the organisation's programme for BCM;

- **Business Continuity Impacts and Strategies Toolkit:** identifies the CCG's key activities, the potential impacts and risks of disruption to them as well as the strategies/options for dealing with disruptions;
- **Business Continuity Plan (BCP):** documents the CCG's procedures for responding to disruptive incidents.

Central Manchester CCG will develop additional documents as required to support the business continuity management programme, such as training and exercising logs or incident debrief reports.

All documents relating to the CCG's business continuity management programme will be appropriately identified and described (e.g. will include a title, date, author and version number) and will be available, as appropriate, electronically or as a paper copy.

4.4 Communication and Awareness

This policy along with all supporting and associated business continuity information and documents will be placed in appropriate places on the CCG intranet and network drive.

The business continuity management programme will be promoted in various ways (e.g. via CCG email circulations, in CCG meetings, at meetings of the Manchester Health Economy Resilience Group and during induction of new starters) and consideration will be given to the options for enhancing understanding and awareness of the programme through channels such as staff drop-in sessions, seminars and e-learning.

4.5 Governance

Central Manchester CCG's business continuity management arrangements will link with the organisation's established governance and risk management processes, namely the Central Manchester CCG Corporate Governance Committee.

4.6 Audit and Review

Audit of Central Manchester CCG's business continuity management arrangements will be in line with the CCG's established audit procedures and may be subject to additional internal or external audit as required.

This policy, as well as the BC Impact and Strategies Toolkit and the CCG Business Continuity Plan, will undergo formal review at least annually to ensure content remains applicable. Review of this policy will be undertaken, at least annually, by Central Manchester CCG Corporate Governance Committee. Additional review may be undertaken following incidents or disruptions. By undertaking regular review of the BCM programme, Central Manchester CCG will seek to continually improve the suitability and effectiveness of its business continuity arrangements.

5. KEY ROLES AND RESPONSIBILITIES

5.1 Chief Operating Officer will:

- take overall ownership of Central Manchester CCG's business continuity management programme
- ensure a policy and objectives are established for Central Manchester CCG's business continuity management programme
- ensure resources needed for Central Manchester CCG's business continuity programme are available

5.2 Accountable Emergency Officer / BCM Lead will:

- ensure Central Manchester CCG meets the business continuity requirements set out within the NHS EPRR Core Standards
- direct and support Central Manchester CCG staff to contribute to effective business continuity management
- promote the importance and need for continual improvement of business continuity management within Central Manchester CCG
- provide an annual update to Central Manchester CCG Corporate Governance Committee on business continuity management

5.3 CCG Staff will:

- contribute to the development, completion and implementation of relevant business continuity management processes, documents and activities for Central Manchester CCG
- review and update Central Manchester CCG's business continuity management documents
- contribute to the continual improvement of Central Manchester CCG's business continuity

5.4 GMCSU Resilience Team will:

- provide business continuity management guidance and advice to the Accountable Emergency Officer / BCM Lead and to Central Manchester CCG staff
- develop relevant business continuity management templates for use by Central Manchester CCG
- support Central Manchester CCG with the development and delivery of appropriate business continuity management awareness raising, training, testing and exercising

APPENDIX (01): The Business Continuity Management (BCM) Lifecycle

The BCM Lifecycle shows the stages of activity that an organisation moves through and repeats with the overall aim of improving organisational resilience.

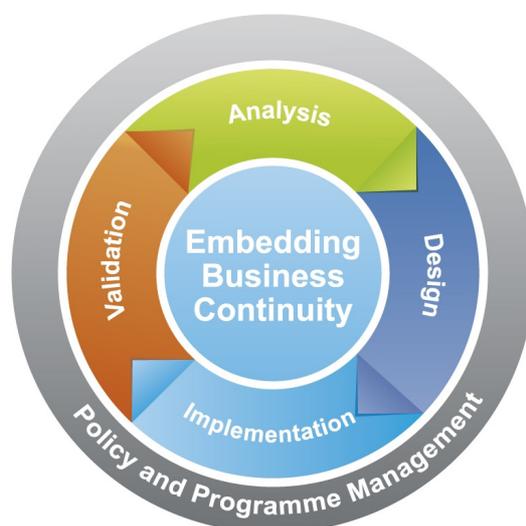


Figure 1: The Business Continuity Management (BCM) Lifecycle
 Source: BCI Good Practice Guidelines 2013

Stage	Purpose
1 Policy & Programme Management	The start of the Business Continuity Management (BCM) Lifecycle. It is the stage that defines the organisational policy relating to business continuity (BC) and how that policy will be implemented, controlled and validated through a BCM programme that is underpinned by BCM objectives.
2 Analysis	The stage within the BCM Lifecycle that reviews and assesses the organisation in terms of what its key activities are, how it functions and the impacts of disruption to key activities.
3 Design	The stage within the BCM Lifecycle that identifies and selects appropriate strategies and options to determine how continuity and recovery from disruption will be achieved.
4 Implementation	The stage within the BCM Lifecycle the implements the agreed strategies and options through the process of developing Business Continuity Plans (BCP).
5 Validation	The stage within the BCM Lifecycle that confirms the BCM programme meets objectives established from the BCM policy and that the organisation's BCPs are fit for purpose.
6 Embedding Business Continuity	The stage within the BCM Lifecycle that continually seeks to integrate BC into day-to-day business and organisational culture.

APPENDIX (02): Outline of Implementation Process for CCG Business Continuity Management Programme



BCM Lifecycle Stages

(1) Policy and Programme Management	(2) Analysis	(3) Design and (4) Implementation	(5) Validation
(6) Embedding Business Continuity			

Key Elements of BCM Programme Implementation Process

Scoping Discussion	Presentation to Executive Management Team	BCM Initial Meeting	BCM Initial Meeting	BCM Exercise Meeting	Business Continuity Exercise
<ol style="list-style-type: none"> 1. Scope CCG BCM programme 2. Identify CCG BCM lead 3. Draft a CCG BCM policy 4. Link with existing CCG Risk and Governance arrangements 	<ol style="list-style-type: none"> 1. Gain CCG EMT approval for BCM policy 2. Agree schedule of BCM meetings 3. Share and raise awareness of BCM policy 	<ol style="list-style-type: none"> 1. Agree BCM roles 2. Agree template BCM documents 3. Agree timeline and responsibilities for completion of BCM documents 	<ol style="list-style-type: none"> 1. Review completed BCM documents 2. Agree any amendments to BCM documents 3. Share BCM documents with interested parties 4. Establish BC procedures and relevant training 	<ol style="list-style-type: none"> 1. Establish BC exercise aim and objectives 2. Identify BC exercise roles and responsibilities 3. Agree date and details of BC exercise 4. Provide notification of BC exercise 	<ol style="list-style-type: none"> 1. Deliver BC exercise 2. Identify learning and follow up actions from the BC exercise 3. Implement follow up actions and amend BCM documents as required

APPENDIX (03): Sample CCG Business Continuity (BC) Objectives

In order to implement and maintain an effective business continuity management (BCM) programme, Central Manchester CCG will establish and communicate relevant business continuity objectives. The BC objectives will be consistent with the CCG BCM policy, be measurable, take into account applicable requirements and be monitored and updated as appropriate.

Date BC Objectives set:	
BC Objectives set by: (Name, Title)	

No.	Objective	Due by
01	e.g. Identify a CCG business continuity management lead	dd-mmm-yyyy
02	e.g. Draft a CCG BCM policy	dd-mmm-yyyy
03	e.g. Gain approval for CCG BCM policy	dd-mmm-yyyy
04	e.g. Undertake a CCG business impact analysis and risk assessment	dd-mmm-yyyy
05	e.g. Identify CCG prioritised activities	dd-mmm-yyyy
06		
07		
08		
09		
10		