NHS
Islington
Clinical Commissioning Group

BUSINESS CONTINUITY PLAN

1	DRAFTED BY:	INTEGRATED GOVERNANCE MANAGER
2	ACCOUNTABLE DIRECTOR:	DIRECTOR OF QUALITY AND SAFETY
3	APPLIES TO:	ALL STAFF
4	COMMITTEE & DATE APPROVED:	GOVERNING BODY, 5 MARCH 2014
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DOCUMENT CONTROL

Date	Version	Action	Amendments
January 2014	3.0	Reviewed and updated	Amended to bring in line with other CCG policies and to reflect reciprocal arrangements
March 2014	4.1	Adopted by the Governing Body	Small typographical errors and formalisation of agreement with Camden CCG
November 2014	4.2	Amendment to help make it easier to set up the incident room	Incident box relocated

1. Introduction

This document is Islington CCG's business continuity plan. It sets out how the CCG will respond to an emergency or incident in order to ensure that the CCG's critical functions continue and all its functions are re-established with the minimum, of disruption with particular emphasis on patient safety and continuity of high quality care. It is one of the CCG's core policies.

2. Policies statement

Islington CCG's policies set out the organisation's standards and intentions, and are written with the aim of being as clear and comprehensive as possible. However, we operate in a dynamic and evolving work environment and attention should be paid to the spirit of the policy as well as the letter. Policies by themselves cannot guarantee effective behaviour or the delivery of key objectives. While they are designed to support the CCG, and the people working within it, our success depends on continuous, high quality effort by everyone the policy covers. Therefore thought must be given to good practice when applying or interpreting any of the CCG's policies, and you should read any guidance or supporting documentation that relates to this policy to help you do this. In addition, this policy should work in accordance with national and local guidance on child and adult safeguarding as applicable.

3. Purpose and Scope of the Business Continuity Plan

An incident or set of circumstances which might present a risk to the continuity CCG services might be identified by any member of staff. When an incident is identified, it is important that the person identifying the incident knows what to do.

As category two responders under the Civil Contingencies Act 2004, Clinical Commissioning Groups (CCGs) are required to have a business continuity plan in place to manage the effects of any incident that might disrupt its normal business.

The business continuity plan lays down the process to be followed in the event of an incident which impacts upon the delivery of CCG functions by adopting a generic approach to such incidents. It aims to help the reader consider business continuity in terms of:

- People
- Premises
- Technology
- Key partners and services

This document does not cover or apply to system-wide emergency preparedness or resilience such as responses to service failure, winter planning or surge planning.

4. Who this policy applies to

The policy applies to all staff working at work with Islington CCG including (but not limited to) employees, joint appointments, members of the Governing Body, agency staff, contractors, and staff/employees of commissioning support organisations.

This policy applies to all areas of Islington CCG's work including its work with stakeholders. This includes work with organisations such as NHS England, local Healthwatch, the Local Authority, member practices etc.

It does not apply to employment related matters – how staff have been treated at work, terms and conditions of employment, relationships with colleagues etc. These are covered by HR policies, such as the Grievance Policy, Work Life Balance Policy and the Induction, Development and Appraisal Policy.

5. Identification and declaration of an incident

An incident or emergency is anything that could affect the continuity of the CCG by preventing the delivery of its functions or the services it provides. An incident or emergency could arise at any time. The business continuity plan sets out a framework for how they will be managed whenever they occur.

6. Immediate Actions in all cases

In the event a possible incident is identified the order of actions is below. There are 10 in this list which goes over two pages.

1. Identify the nature of the incident and assess the impact, including possible health and safety issues.

2. Contact the CCG director on call, the Commissioning Support Unit (if necessary), and NHS England.

3. Contact key partners (see below)

4. Form a business continuity team, made up at a minimum of the lead director (or, out of hours, the director on call) and team leader. If the incident is assessed as likely to go on for more than four hours the team will need enough staff to fill a rota.

5. After assessing the scale and likely impact of the incident determine:

    - CCG activities that must be continued
    - CCG activities that can be scaled down
    - CCG activities that can be suspended for the duration of the incident and recovery phase.

6. Determine key priorities for responding to the incident and subsequent recovery, and begin their implementation (see section 13).

7. Start documenting information and actions (these must be kept and will be collated when the incident is over.

8. Brief Staff ensuring they are given clear information and instructions about what happens next and what they should do.

9. Develop and implement a recovery plan, monitoring actions and keeping the stakeholders identified above informed.

10. Scale down business response effort as needed and shutting down the business continuity team when the incident or emergency is over and recovery activities are well under way.

7. Alerting Key Contacts

The CCG Director on Call

Whenever an incident is declared the person declaring the incident, the Chief Officer, the Chair, a Vice Chair or an appropriately senior member of staff must:

1. **Call 08 448 222 888**
2. **Quote: NCCCG**
3. **Pass on: your name and contact number**
4. **When the on call director responds describe:**

- Type of incident
- The current and projected impact of the incident
- The CCG's ability to cope and any additional support or resources required
- Which other agencies/partners are involved in the incident
- Any other information that you think is relevant

Note that under arrangements across the five CCGs in North Central London the director on call may not necessarily be an Islington CCG employee.

North East London Commissioning Support Unit

Whenever an incident is declared the person declaring the incident, the director on call, the Chief Officer, the Chair, a Vice Chair or an appropriately senior manager nominated to do so must:

1. **Call 08 448 222 888**
2. **Quote: NCLCSU1**
3. **Pass on: your name and contact number**
4. **When the on call director responds describe:**

- Type of incident
- The current and projected impact of the incident
- The CCG's ability to cope and any additional support or resources required
- Which other agencies/partners are involved in the incident
- Any other information that you think is relevant

It will also be necessary to separately inform the Commissioning Support Unit's communications team to ensure appropriate media management can be undertaken. Out of hours this can be done by **calling 07 932 028 012** or emailing **oncallcommunications@nelcsu.nhs.uk**

NHS England

Whenever an incident is declared the person declaring the incident, the director on call, the Chief Officer, the Chair, a Vice Chair or an appropriately senior manager nominated to do so must:

1. **Call 08 448 222 888**
2. **Quote: NHS01** [NHS zero one] (this is the code for the NHS England (London) Manager)
3. **Describe:**

   - Type of incident
   - The current and projected impact of the incident
   - The CCG's ability to cope and any additional support or resources required
   - Which other agencies/partners are involved in the incident
   - Any other information that is deemed relevant

8. **Key services and recovery priority**

Below is a list of CCG activities ordered by the amount of time they can be stood down in the event of an incident (subject to some resources needs and support they may need to re-establish services). Any recovery plan should ensure it takes into account the need not only to recover from the effects of the incident itself but the need to bring services back up to delivering at full capacity.

The suggested priority order below may be changed as necessary and depending on the details of the incident the CCG is dealing with and with due regard to patient safety, clinical risk, and reputational and financial risks.

Less than 24 hours

- The functions of the Chair and the Chief Officer
- Governance activity relating to health and safety and information security
- Business Support Team, if a skeleton service can be re-established to handle diary and general CCG queries (e.g. manning the switchboard number), and it is recognised that hitting deadlines for submission of and sending out papers will be affected.

Up to 48 hours

- Medicines Management if a skeleton service can be re-established at that time to deal with GP and pharmacy queries, and that has access to IT and telephony systems.
- Communications (excluding media management which forms part of the response).
- The functions of the lay vice chair and clinical vice chair.

Up to one week

- Child safeguarding, if the team can be set up to operate from a local CCG or the local authority and has access to IT and telephony systems.

- Adult Safeguarding.
- The investigation of serious incidents and patient safety.
- Finance (the payment of invoices etc).
- Joint commissioning activity.
- QIPP related activity.

Up to two weeks

- Continuing Healthcare, if financial systems were in place to allow the payment of invoices and The Whittington Hospital continued to support eligibility assessments.
- Governance activities not related to information governance or business continuity management.
- Primary Care, although additional resources may need to be brought in to re-establish its programme of work.
- Patient and public engagement.

9. Emergency pack

The CCG shall maintain an emergency pack in paper and electronic form that will contain:

- A copy of this document.
- A list of employees with work and emergency contact numbers.
- A list of key stakeholders and their contact details including.
  - The landlord of Goswell road;
  - Security for the premises;
  - The CSU (HR, payroll, IT and media management);
  - NHS England;
  - NHS Property Services;
  - Key partners at the London borough of Islington;
  - Key contacts at commissioned services
  - SBS Oracle (for financial services)
- A summary of sensitive data that requires protection
  - Commercially or financially sensitive;
  - Patient or other personal confidential data.
- An up to date register of information assets.
- The location of the company seal.
- Resources necessary for Camden CCG staff to work at Goswell Road.
- Resources necessary for Islington CCG staff to work at Stephenson House.

10. Setting up the Incident Room

The Seminar Room situated in the Ground Floor at Goswell Road will become the Incident Room if that is required for the management of an incident. This room is fully equipped with IT for telephony/facsimile/internet. There is a television, and a projector for presentations. In the event the Incident Room is required all other meetings booked for that room may be cancelled.

Out of hours

The CCG offices at Goswell Road are staffed from at least 7:30am to at least 7:00pm Monday to Friday. The building should be staffed 24 hours a day but when the building is not staffed you will need to contact Classic Security on 01 403 75 3504 to gain access.

Detailed instructions for setting up the incident room can be found in Action Card 3

11. Informing Staff

The CCG will ensure staff are informed of the incident in the following way:

The Director on call will inform all line managers; and all managers will inform their staff using contact information that staff have provided.

The CCG will also consider supporting systems that will help inform staff including:

- CSU HR
- The CCG's twitter feed
- An all staff email on the CCG's email system
- A statement on the CCG's website

Different routes will be available and appropriate depending on the specific incident.

12. Arrangements we have made with other organisations and how we respond when they declare an incident

The CCG has entered into a reciprocal arrangement with Camden CCG whereby in the event of an incident that requires it, key staff from one organisation may work temporarily from the offices of the other. In the event Camden CCG needs to base colleagues with us then Islington CCG will:

- Provide at the earliest appropriate time an induction to the CCG's premises at Goswell Road (location of emergency exits, first aid kits, etc).
- Consider activating its own Business Continuity Plan so it can consider suspending its own non-critical functions to better have capacity to accommodate colleagues from Camden.
- Provide such support as it can for the speedy end of the declared incident.

13. Scenarios

Any incident the CCG faces is likely to fall within one of a small number of categories, listed below. Each of them affect the business in different ways and as such will require a different, tailored, response from the business continuity team.

The main categories and key actions are discussed below. It should be noted more than once scenario can occur at once.

Loss of Access to Premises

At some time the CCG may lose access to part of or all its offices at Goswell Road. This could be due to damage to the fabric of the building; because access has been restricted to the immediate area; or because utilities like electricity or sewerage are no longer available. This scenario does not cover the loss of IT or telephony services; or difficulty travelling to the office due to adverse weather conditions. It relates only to the loss of the CCG's offices at Goswell Road as a usable working environment for a sustained period, rather than short term temporary inconvenience caused by e.g. toilet facilities requiring emergency maintenance.

In this scenario generally the following actions will be part of the response. The detail will be decided depending on the nature of the incident.

- All staff informed by cascade when an incident is declared.
- Camden CCG is contacted.
- A statement is placed (by the CSU on request of the CCG) on the CCG's website and on its twitter feed.
- Staff able to work remotely are asked to do so until suitable alternative office space can be found or access to Goswell Road is restored.
- Staff able to work with colleagues at local authority premises are asked to do so until access to Goswell Road is restored.
- Critical services are located immediately with Camden CCG.
- Non-critical activities are suspended
- Non-critical staff who are unable to work remotely take annual or unpaid leave.
- Staff holding scheduled meetings or events at Goswell Road on the day the incident is declared <u>and the next two working days </u>reschedule them and inform attendees. For periods after this staff will be asked to start securing alternative venues
- Ensure the building is kept secure by liaising with landlord/security
- Staff may need to give up their iPad or work mobile/blackberry so a colleague may use it.

Loss of Key Staff

It may be many or most staff are unable to come to work for a sustained period, perhaps because of a widespread outbreak of disease, or ongoing transport disruption, which affect them or people for whom they have caring responsibilities. The business continuity plan will not normally need to be activated for short term disruption like poor weather, a day or two of industrial action whether by staff, transport, educators etc.

In this scenario generally the following actions will be part of the response. The detail will be decided depending on the nature of the incident.

- All staff informed by cascade when an incident is declared.
- Staff able to work remotely are asked to do so until disruption falls below a level where staff are safely able to start returning to work
- Non-critical activities are suspended
- Where necessary and available staff redeployed to support critical functions

- For staff able to come into work but who are on annual leave, managers will consider asking them to cut their leave short and return to work
- Staff holding scheduled meetings or events during the period of the incident should reschedule them and inform attendees.
- Ensure the building is kept secure by liaising with landlord/security
- Staff may need to give up their iPad or work mobile/blackberry so a colleague may use it.

Loss of Access to Information Systems

Due to circumstances beyond its control the CCG may lose access to its telephony or IT systems. This can occur if an event like fire or flooding occurs where the CCG's IT system servers are located; if systems are damaged by a computer virus; or more likely if the cables and wires carrying information to and from the CCG are accidentally cut.

The ways of mitigating against the effects of this scenario include good information governance. Staff should be familiar with guidance on information security.

In this scenario generally the following actions will be part of the response. The detail will be decided depending on the nature of the incident.

- All staff informed by cascade when an incident is declared.
- If still accessible a statement is placed (by the CSU on request of the CCG) on the CCG's website and on its twitter feed.
- If a localised failure (the Blue network is still functioning apart from Goswell Road):
  o Camden CCG is contacted.
  o Critical services are located immediately with Camden CCG.
  o Staff able to work with colleagues at local authority premises do so.
  o Staff able to work remotely are asked to do so until IT is restored.
- Non-critical activities are suspended.
- Non-critical staff who are unable to work remotely take annual or unpaid leave.
- The business continuity team prioritises working with IT and service suppliers to facilitate rapid restoration of at least partial IT and/or telephony services.
- Staff may need to give up their iPad or work mobile/blackberry so a colleague may use it.
- The business continuity team work with IT to identify information that may have been lost and explore data recovery options.

Loss of Key Services and Partners

There are relatively few key services whose disruption would require the CCG to activate its business continuity plan, and then in most cases to provide interim support while our partners or service providers deal with the incident and recover.

Examples include joint commissioning functions, public health, performance management or patient safety functions, or other critical activities shared with organisations like the Commissioning Support Unit.

In this scenario the CCG is using its business continuity plan to support business continuity functions in other organisations. Therefore it depends on those organisations having clear business continuity plans of their own.

Activities that CCG should consider include:

- All staff informed by cascade when an incident is declared.
- Relevant organisations provide a copy of their business continuity plan and contact details of their business continuity team
- The CCG's business continuity team considers appropriate supporting activity which may include
  - Staff able to work remotely are asked to do so
  - Work space is provided to colleagues from a key partner or service provider so they can deliver critical functions
- Non-critical activities are suspended

14. The end of the incident

At the end of the incident the director leading the business continuity team will declare the incident over, and being the implementation of recovery actions to restore business as usual. He or she will take a view about when to disestablish the business continuity team as part of this. All information used and records generated during the management of the incident are collated and provided to the Business Continuity Lead. The Director and the Lead will undertake a lessons learned exercise that will focus on analysing the causes of the indent and improving responses to incidents.

A report will be provided to the Audit Committee detailing the incident, the response; lessons learned and any clinical, financial or reputational issues that may have arisen.

15. Roles and Responsibilities

Directors are responsible for taking part in on call arrangements and responding to reports of an incident. Lead directors declare incidents, ensure key colleagues and partners are informed, initiate media management and manage the response to the incident. They are responsible for declaring the incident over.

Team leader manages the implementation of the business continuity plan, the response to the incident, and the recovery plan. When the incident is over the Team Leader will work with the Business Continuity Lead to ensure all records are kept and appropriate lessons learned exercises are undertaken.

Lead for Business Continuity Planning: responsible for keeping the business continuity plan up to date, including reviewing and testing; and working with the business continuity team to collate materials after the incident is over and conduct a lessons learned exercise

Staff are expected to be aware of the business continuity plan, and comply with its requirements including participating in testing and providing up to date contact

details. Staff are required to comply with instructions issued by the business continuity team.

16. Breaches of Policy

If a member of staff is unable or unwilling to comply with the requirements of the business continuity plan, both in its testing and its application, then this may be dealt with under the conduct and capability policy.

If a member of staff identifies an issue that prevents one or more members of staff successfully complying with the business continuity plan, they should follow the whistleblowing policy.

If a member of staff feels they are being prevented from successfully completing their tasks under the business continuity plan they should follow the grievance policy

If a member of the public, patient/service user, carer or any other person feels the CCG's business continuity plan is unsuitable or unfit for purpose, or has any other objection relating to it, their complaint should be handled using the complaints policy.

17. Communication of the Business Continuity Plan

On adoption the business continuity plan will be published alongside the CCG's other policies and disseminated to staff through normal communication channels. Staff will take part in testing and be informed of the outcome of testing of the plan (see below).

18. Testing

After adoption the CCG will immediately move into a period of testing and review. Testing will include both desktop and actual exercises. This testing and review phase will be used to update and improve the business continuity plan after which the CCG will be asked to re-adopt it.

19. Additional Reading

The NELCSU EPRR on call manual v 1.8

Action Card 1 – Contacting the Director on Call

Action Card 2 – Contacting NHS England

Action Card 3 – Setting up the Incident Room

Action Card 4 – Information Governance

Action Card 5 – Loss of Premises: Camden CCG

Action Card 6 – Loss of Premises: Islington CCG