

Report of Director Resources & Housing**Report to Corporate Governance & Audit Committee****Date: 16th March 2018****Subject: Annual Business Continuity Report**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Civil Contingencies Act 2004 made it a statutory duty of all Category 1 responders (which includes local authorities) to have in place Business Continuity Plans to be able to continue to deliver critical aspects of their day to day functions in the event of an emergency or disruptive incident.
2. The purpose of the annual report (published since 2013) is to provide the Corporate Governance & Audit Committee with assurances relating to the adequacy of business continuity management arrangements currently in place in the council.

Recommendations

3. The Committee to consider the assurances provided by this report and note that the business continuity arrangements are fit for purpose, up to date, are routinely complied with, have been effectively communicated and are monitored.

1 Purpose of this report

- 1.1 To provide assurance to the Corporate Governance & Audit Committee of the adequacy of the business continuity management arrangements currently in place.
- 1.2 To provide a forward look at some of the developments and initiatives planned and proposed to ensure that the council's business continuity arrangements continue to maintain pace with good practice guidance.
- 1.3 To provide assurance that Leeds City Council (LCC) maintains compliance with the statutory duties contained within the Civil Contingencies Act 2004.
- 1.4 The scope of the report includes progress relating to:
 - Risk awareness & horizon scanning
 - Reviewing and maintaining Business Continuity Plans
 - Exercising & testing of Business Continuity Plans and arrangements
 - Directorate Resilience Groups
 - Supporting commissioned service providers
 - Provision of advice and assistance to business and voluntary sectors
 - Public awareness and warning and informing
 - Collaborative arrangements

2 Background information

- 2.1 The Civil Contingencies Act 2004 made it a statutory duty of all Category 1 responders (which includes local authorities) to have in place Business Continuity Plans. Business Continuity Plans are documented procedures that guide organisations to respond, recover, resume and restore the continuity of prioritised services and functions in the event of an emergency or disruptive incident.
- 2.2 Leeds City Council initiated a Business Continuity Programme to coincide with the publication of BS ISO 22301:2012 'Business Continuity Management Systems – Requirements'. The programme was successfully completed in September 2015 when the work was then transferred into the business as usual activities of the Resilience & Emergencies Team.
- 2.3 There are currently 79 Business Continuity Plans owned and maintained by services and functions across the 5 directorates comprising LCC.

3 Main issues

3.1 Risk awareness and horizon scanning

- 3.1.1 It is as important to have robust risk awareness and horizon scanning arrangements for new threats and hazards as well as learning from past experiences.
- 3.1.2 A robust approach to risk awareness is essential to inform council and city resilience and the development of mitigating arrangements and response capabilities for risks that could threaten the performance of LCC prioritised services and functions.
- 3.1.3 The changing risk landscape affecting the UK, is captured in the National Risk Assessment. The NRA 2016 (published by the Cabinet Office at Official-Sensitive) contains 77 risks covering a range of 'hazards', 'threats' and 'threat composite' risks ('threat composite' risks is where a risk contains amalgamated information about a number of 'threat' risks in order to make it appropriate for release at 'official sensitive'; the individual 'threat' risks are classified 'secret UK eyes only'). To view hazards and particularly the individual threats requires an appropriate level of security clearance.
- 3.1.4 The NRA 2016 comprises various annexes including an annexe detailing any changes i.e. changes to impact and likelihood scores as well as any new risks.
- 3.1.5 The National Risk Assessment 2016 (NRA 2016) is the most recent version published and is currently being used to inform review of the West Yorkshire Community Risk Register.

The West Yorkshire Community Risk Register is public facing and describes risks relating to 'hazards' only. The West Yorkshire Resilience Forum is responsible for ensuring that the West Yorkshire Community Risk Register (published on the West Yorkshire Police website) reflects any nationally identified changes identified in the NRA 2016.

- 3.1.6 The review and revision of the West Yorkshire Community Risk Register is work in progress and is been supported and monitored by the West Yorkshire Resilience Forum Strategic Group jointly chaired by Assistant Chief Constable Andy Battle, West Yorkshire Police, Dave Walton, Deputy Chief Fire Officer, West Yorkshire Fire & Rescue and Robin Tuddenham, Chief Executive, Calderdale Council.
- 3.1.7 LCC, through the Directorate Resilience Groups (see 3.4 below) will use the revised West Yorkshire Community Risk Register to raise awareness of the risks facing West Yorkshire and Leeds and use this to inform business continuity and emergency planning arrangements in readiness should any of the risks be realised. Once reviewed, the West Yorkshire Community Risk Register will be used to inform development of a community facing risk register containing key risks in an easy to understand format offering guidance to communities on how to improve their preparedness and resilience.

- 3.1.8 The West Yorkshire Resilience Forum provides an excellent conduit for horizon scanning regarding changes to risks and threats and together with the NRA 2016 and West Yorkshire Community Risk Register inform the reviews of the LCC Corporate Risks on 'City Resilience' and 'Council Resilience'.

The Corporate Risks are fully reviewed on a quarterly basis using the systematic approach enforced through the '4Risk' software. A detailed Annual Corporate Risk Management Report is produced by LCC's Intelligence & Policy Service for Executive Board's consideration with assurance on the council's risk management arrangements provided annually to the Committee.

- 3.1.9 In October 2017, an independent peer challenge was carried out on the collective resilience arrangements of London's 33 local authorities. The review was led by a peer review team comprising Mary Ney, Consultant Local Government and former Chief Executive of the Royal Borough of Greenwich, Tom Riordan, Chief Executive LCC and Mariana Pexton, Chief Officer Strategy & Improvement LCC. The aim of the review is to drive reflection by London Local Authority stakeholders, including Leaders and Chief Executives, on the review findings and how existing collective arrangements could be strengthened.
- 3.1.10 The output of the review is a report containing a series of 11 recommendations covering a range of resilience-related issues – some of which have business continuity implications. The report provides an opportunity for LCC to self-assess against the 11 recommendations and evidence LCC's current resilience, emergency preparedness and response capabilities mapped against each recommendation with potential improvements identified and noted.
- 3.1.11 Although the 11 recommendations are focussed on issues concerning the London boroughs, they are of wider interest. LCC has therefore drafted an action plan in response.
- 3.1.12 This evidences that progress has been made over the years with raising the standard of council resilience and organisational response, however the London review provides a new insight into an ever changing resilience landscape and highlights the need for clarity, simplification and some strengthening of current arrangements.
- 3.1.13 The action plan when fully populated will identify ownership, document progress and be monitored on a regular basis by the councils Corporate Leadership Team.

3.2 Reviewing and maintaining Business Continuity Plans.

- 3.2.1 There are currently 79 Business Continuity Plans implemented for LCC's prioritised services and functions.
- 3.2.2 Prioritised services are services and functions that if disrupted would have an impact on human welfare, security, the environment, finance, legal or reputation and would require recovery within a specified timescale (usually within 24 hours or less) as assessed through completion of a Business Impact Analysis.

- 3.2.3 When developed, each Business Continuity Plan contains arrangements for loss of staff, loss of buildings and premises, loss of information communication and technology, and loss of key suppliers and supplies. However, the content of each plan will differ due to the nature of the service or function and its specific requirements. Each plan also contains a comprehensive key contact list.
- 3.2.4 Once implemented, it is the responsibility of the manager or officer responsible for the service or function to ensure that the Business Continuity Plan is maintained and fit for purpose. To support managers and officers in maintaining their plans, an annual review is co-ordinated and tracked by the Resilience & Emergencies Team.
- 3.2.5 Annual reviews are scheduled in alignment with the original date of issue of each Business Continuity Plan. At the time of producing this report, 63 reviews are completed/up to date with the remaining 16 currently reporting reviews as work in progress.
- 3.2.6 A major change for some of LCCs prioritised services will be the relocation into Merrion House during the spring. This will require revisions to Business Continuity Plans which will need to be identified and implemented *additional* to the annual review process. Changes will mainly be in relation to loss of buildings and work environment (should Merrion House be inaccessible) and the identification of continuity arrangements such as alternative accommodation and or remote working. The on-going 'Changing the Workplace' programme has helped to mitigate loss of buildings and accommodation through equipping staff with the technology to work remotely including 'hot-desking' facilities at most buildings or working from home.
- 3.2.7 Besides the annual review, learning from recent events and incidents is used to inform the continual development of business continuity and emergency planning arrangements. These can be service related incidents where improvements to Business Continuity Plans can be quickly identified and implemented, or national incidents. For example, both the Manchester Arena and Parsons Green Tube terrorist attacks and the resulting uplift of the National Threat Level to 'critical' informed the development and introduction of additional security measures at key LCC buildings and is progressing closer working with voluntary organisations and faith groups.
- 3.2.8 Learning from sources as disparate as Grenfell Tower and the London Peer Review, is informing improvements with LCC and multi-agency response and recovery arrangements and the awareness of the impact on communities and local businesses.

3.3 Exercising & testing of Business Continuity Plans and arrangements.

- 3.3.1 The managers and officers owning the Business Continuity Plans are responsible for exercising and testing their own plans and arrangements. However, the Resilience & Emergencies Team does offer support in developing and delivering scenario-based (short) table top exercises. Recently, table top exercises have been developed and delivered for Legal Services and the Digital & Information Service. The former included loss of premises and loss of ICT, the latter loss of premises, cyber-attack and loss of staff through a health outbreak scenarios.

Both exercises identified areas for improving the Business Continuity Plans and also provided challenge to staff in how they would respond to the various scenarios. An exercise to test the Leeds Fuel Plan is also pending.

- 3.3.2 Disruptive incidents can impact a wider area and require a multi-agency response. Multi-agency exercising continues to be scheduled through the West Yorkshire Resilience Forum. The next West Yorkshire Resilience Forum multi-agency exercise (Exercise Brisbane) is scheduled over two days for 31 May and 1 June 2018. There is also an independently run multi-agency exercise to test the Flood Alleviation Scheme Activation Procedures (Exercise Titan) scheduled for 15 March 2018.

3.4 Directorate Resilience Groups

- 3.4.1 Each directorate has a Directorate Resilience Group (DRG). Chaired by a Chief Officer, the DRGs have a wide remit including providing assurance to the director that business continuity plans and emergency planning arrangements are being developed and maintained in line with the changing risk landscape. The DRGs use the West Yorkshire Community Risk Register as a key tool to maintain awareness of the risks facing both West Yorkshire and Leeds.
- 3.4.2 Since the realignment of the council's organisational structure in 2017, the DRG's have been reconfigured to reflect the structure. In some cases, this included new chairpersons and a refresh of membership.
- 3.4.3 Despite the impact of the changes, all but one of the five DRGs are now fully functioning, demonstrating excellent levels of engagement and meeting on a regular basis. The Communities & Environment DRG hasn't met recently; following a leadership event around emergency planning arrangements, a refresh is currently work in progress. An initial meeting is scheduled in March to discuss the way forward.
- 3.4.4 The new chairpersons and changes of membership have identified some new ideas and ways of working which will be considered and taken forward to bring improvements across all 5 DRGs. One of the key proposals is for each DRG is to critique a Business Continuity Plan as part of the regular meeting agenda, which will help to provide directors with additional assurance that plans continue to be fit for purpose.

3.5 Supporting commissioned service providers

- 3.5.1 Since 2013, the Resilience & Emergencies Team have been completing assessments of commissioned service provider Business Continuity Plans for Adult Social Care. To date 82 assessments have been completed.

The assessments include detailed feedback and recommendations which the provider organisation can consider and implement to improve their arrangements. Implementation of recommendations often results in an improved rating on subsequent assessments.

3.5.2 Due to capacity, the Resilience & Emergencies Team can only complete assessments by exception. However, two training sessions have been held with Adult Social Care Strategic Commissioning to help staff to develop a greater understanding of the business continuity process so that officers are better equipped to respond directly to any queries raised by provider organisations and eventually to complete the assessments themselves.

3.5.3 To help service provider organisations help themselves, the Resilience & Emergencies Team have during 2017 delivered inputs to Commissioned Service Provider Forums. The inputs have been basic business continuity awareness including the key steps in the development of a Business Continuity Plan. Several requests were raised for generic templates and guidance to help organisations develop their own Business Continuity Plans. Generic templates are currently in development and will be published on leeds.gov.uk 'business continuity' pages for access by external organisations.

3.6 Provision of advice and assistance to business and voluntary sector

3.6.1 The Civil Contingencies Act 2004 requires local authorities to provide advice and assistance to those undertaking commercial activities and voluntary organisations in relation to business continuity management. LCC maintains a range of initiatives in relation to this requirement.

3.6.2 Key to provision of advice to businesses (of a warning and informing nature) is the Leeds Alert Warning & Informing System, a joint initiative between LCC and West Yorkshire Police. Leeds Alert currently has over 1,600 persons registered from businesses in Leeds. The system is used to send messages (email or text) warning and informing of events or incidents that might impact the Leeds area and therefore business operations.

3.6.3 The most common use of Leeds Alert is warning of Bridgewater Place road closures, but it is an effective tool for getting messages out quickly for any incident or emergency.

3.6.4 There is also a Leeds Alert Twitter account @leedsemergency with over 6,399 followers.

3.6.5 To encourage further uptake of businesses registering with Leeds Alert, colleagues in City Development are to promote Leeds Alert through the BID (Leeds BID, Business Improvement District, is a business-led, not for profit organisation with an ambitious plan to transform Leeds city centre). This will target retailers in the town centre who may not have yet registered with Leeds Alert.

3.6.6 The promotion will coincide with the lead-up to the next Leeds Alert/Business Continuity Network Event (see below) in June 2018 which will have a theme of preparedness in the city centre.

3.6.7 Held twice yearly, the 'Leeds Alert/Business Continuity Network Event' offers those attending an opportunity to hear business continuity practitioners and professional speakers deliver a range of presentations relating to business continuity and other

broader resilience topics. Invitations go to all registered with Leeds Alert achieving between 150 – 180 attendees on the day.

- 3.6.8 The aim is for those attending to be able to take away learning to inform their own organisational resilience. The most recent event was December 2017 with the next scheduled for June 2018.
- 3.6.9 A further route to providing advice and assistance is the Leeds Resilience Group. Meetings are held on a quarterly basis and are attended by key officers within the council and from a range of partners including West Yorkshire Police, West Yorkshire Fire & Rescue Service, Yorkshire Ambulance Service, NHS, Environment Agency, British Red Cross, Leeds Bradford International Airport, British Transport Police, Rail Track and representatives from the utility providers. The forum provides the opportunity to share learning and issues facing the organisations and encourages closer working and collaboration between partners.
- 3.6.10 Attendance at the meetings tends to fluctuate depending on what might be occurring nationally, regionally and locally. If there has been a terrorist attack, or a planned event is drawing closer (e.g. the Tour De Yorkshire), then attendance increases as attendees seek more information and support to aid their planning.

3.7 Public awareness and warning and informing

- 3.7.1 The Civil Contingencies Act 2004 requires local authorities to advise the public of risks before and during an emergency. The Resilience & Emergencies Team have a number of arrangements in place to warn and inform the public:
- Leeds Alert Twitter account @leedsemergency. Although this account is aimed primarily at businesses in Leeds, the Twitter account is open to followers from the public and as noted above, currently has over 6,399 followers.
 - The Resilience & Emergencies Team has supported various partner organisation campaigns promoted using social media via the @leedsemergency Twitter account.
 - The Resilience & Emergencies Team has a range of information and guidance published on the leeds.gov.uk website 'Preparing for Emergencies' pages. The pages include a wealth of information on business continuity contained within the 'Planning for Emergencies' brochure.
 - The Resilience & Emergencies Team has a presence at various public engagement events during the course of the year though opportunities for public engagement events have been far and few between during 2017. However, all opportunities will continue to be pursued/considered by the Resilience & Emergencies Team and if capacity permits and attendance is appropriate, then opportunities will be progressed during 2018. Two key events during 2017 were:
 - The Emergency Services Show at West Yorkshire Fire & Rescue Service College at Birkinshaw in July which attracts large numbers of families to this annual outdoor event. The Resilience & Emergencies Team take along the

Emergency Coordination Vehicle as a focal point for the display with staff answering questions and handing out information leaflets to the public.

- A councillor engagement event 'Leeds Flood Ready' was held in the Civic Hall Ante Chamber in September 2017. This event was in collaboration with LCC Flood Risk Management, the Environment Agency and Yorkshire Water colleagues and ran from 10:00 through until 14:00 aiming to attract councillors as they arrived for a full council meeting. The aim was to help councillors become more prepared and ready for a flood incident in their ward.

3.7.2 Liaison continues between the council's Communication & Marketing Team and Resilience & Emergencies Team during incidents regarding the provision of information to the public and media. This support extends to out of hours.

3.8 Collaborative arrangements

3.8.1 The Civil Contingencies Act 2004 promotes collaborative working arrangements between Category 1 responders in order to fulfil the emergency planning and business continuity requirements of the Act.

3.8.2 The West Yorkshire Resilience Forum leads on and develops collaborative arrangements with the other West Yorkshire local authorities and partner organisations – which includes training and exercising. Although the West Yorkshire Resilience Forum does not have a specific Business Continuity Sub-Group it does link into the Yorkshire & Humberside Regional Business Continuity Forum.

The Leeds Resilience Group (3.6.9 above) fulfils arrangements at a local level.

3.8.3 The LCC 'Emergency Management Plan' drives collaboration both internally between LCC services, and also externally with partner organisations where a multi-agency response is required, for example to respond to a major incident.

3.8.4 An emergency incident, whether internal or external, is likely to have business continuity implications. The LCC Emergency Management Plan sets out how the council will respond to an internal emergency or incident through a LCC Gold (Strategic), Silver (Tactical) and Bronze (operational) command structure. The Emergency Management Plan also sets out how the council will support a multi-agency incident through a Strategic Coordination Group (Gold), Tactical Coordination Group (Silver) and Operational Coordination Group (Bronze).

3.8.5 The LCC Emergency Management Plan includes 'Recovery' which is led by the council and is the process of restoring and rebuilding the business and/or community following an emergency.

3.8.6 The LCC Emergency Management Plan was derived from the LCC Emergency Handbook using the lessons learned from Storm Eva and other incidents and exercises. Feedback and comments received from users noted that the old LCC Emergencies Handbook was difficult to navigate through whereas the new LCC Emergency Management Plan has a much smarter design.

- 3.8.7 Work to allow electronic access to the LCC Emergency Management Plan has stalled due to the requirements for a certain spec of mobile device. However, the proof of concept has been successfully tested and will be progressed as replacement devices (with a greater specification) are issued.
- 3.8.8 A 'Quick Guide' to complement the LCC Emergency Management Plan is in development and will provide guidance to the key elements of an emergency response including multi-agency arrangements. The 'Quick Guide' is aimed at council officers likely to respond to emergencies and will be initially produced in a foldable format designed to be kept on the person i.e. wallet, handbag, briefcase etc. As with the LCC Emergency Management Plan, it is intended that the 'Quick Guide' will eventually be accessible electronically from mobile devices.

4 Corporate Considerations

4.1 Consultation and Engagement

- 4.1.1 There are no proposals contained within this report that have a significant impact on communities.
- 4.1.2 Internal. The services or functions assessed as prioritised activities and requiring development of Business Continuity Plans were identified and agreed by the Directorate Resilience Groups prior to any developmental work commencing.
- 4.1.3 External. LCC through the Resilience & Emergencies Team are fully engaged with the West Yorkshire Resilience Forum which through collaborative working helps LCC to meet the statutory obligations as set out in the Civil Contingencies Act 2004.

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 The on-going development and maintenance of Business Continuity Plans and arrangements takes account of any potential impacts for staff and customers who may have general or specific requirements – in particular those characteristics protected by the Equalities Act 2012.

4.3 Council policies and the Best Council Plan

- 4.3.1 The LCC Business Continuity Policy sets out the business continuity requirements placed upon each directorate and their services.
- 4.3.2 Effective business continuity management contributes to the delivery of the outcomes and priorities set out in the Best Council Plan e.g. our 'Best City' strong economy and compassionate city ambitions by looking after vulnerable people in an emergency and a safe city encouraging investment; to our 'Best Council' efficient and enterprising ambition by maintaining critical services in the event of an incident.

4.4 Resources and value for money

- 4.4.1 There are no financial or resource implications arising from this report.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 The Civil Contingencies Act 2004 requires Category 1 responders (which includes local authorities) to maintain Business Continuity Plans and arrangements to ensure that they can continue to perform their key services and functions in the event of an emergency, so far as is reasonably practicable.
- 4.5.2 Many of the LCC services covered by Business Continuity Plans have a duty of care or a regulatory requirement to provide their service. This extends to maintaining services during an emergency or disruptive incident.

4.6 Risk Management

- 4.6.1 This report provides assurance on the arrangements within the council and partners across the city and region to manage business continuity risks. These arrangements are captured within the council's corporate risks on 'City Resilience' and 'Council Resilience' and reported quarterly to the Corporate Leadership Team and annually to the Executive Board.
- 4.6.2 In addition, the West Yorkshire Community Risk Register compiled and maintained by the West Yorkshire Resilience Forum, informs the development of emergency and business continuity plans and arrangements.

5 Conclusions

- 5.1 The information contained within this Annual Business Continuity Report aims to demonstrate to the Corporate Governance & Audit Committee that LCC continues to have arrangements that are up to date, fit for purpose, effectively communicated, routinely complied with and monitored and that the arrangements meet LCC's statutory duties as required by the Civil Contingencies Act 2004. This is being achieved by:
- Continued monitoring and identification of risks and development of measures to mitigate the risks should they occur.
 - Continued review and revision of Business Continuity Plans for LCC's prioritised services and functions through the annual review cycle.
 - Participation in exercising and training both internally and externally with partner agencies.
 - Maintaining directorate engagement with and ownership of business continuity arrangements through the Directorate Resilience Groups.
 - Providing guidance and support to commissioned service providers in relation to business continuity.
 - Providing business continuity advice and assistance to businesses and the voluntary sector.
 - Maintaining effective systems for public awareness and warning and informing.

- Development of new and enhanced existing collaborative working arrangements with partner organisations.

6 Recommendations

- 6.1 The Committee to consider the assurances provided by this report and note that the business continuity arrangements are fit for purpose, up to date, are routinely complied with, have been effectively communicated and are monitored.

7 Background documents¹

- 7.1 None.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.