KPMG

INFRASTRUCTURE, GOVERNMENT AND HEALTHCARE

Leeds City Council

Business Continuity Management Review – Final

22nd December 2008

AUDIT

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Determine whether the individual business units are following the guidelines set out by the BCM programme and have a clear understanding of their roles and responsibilities within the overall programme

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1 Executive summary

1.1 Introduction

Business Continuity Management (BCM) is the generic term encompassing all aspects of planning, preparation and operational management necessary to provide continuance of business operations under all circumstances.

Business Continuity Planning (BCP) deals with the planning for the recovery of people and facilities required to support business processes. It may include the recovery of desktop and telecommunications, but it does not include the recovery of applications, Systems and infrastructure (addressed by the IT Disaster Recovery Plan).

We agreed with the Council that we would carry out a review of the implementation of BCM arrangements across the Council as part of the 2007/08 Audit and Inspection Plan. Our work was limited to and focused on four Business Units, chosen and agreed between the Council and ourselves. Our assessments and conclusions are based upon discussions with key personnel and a review of relevant documentation presented to us at the time of our review.

1.2 Key findings

✓ The Council have made good progress in the area of BCM within the last year;

✓ The Council have formal documented plans and policies in place that follow good practice;

✓ We found individual expertise and knowledge of BCM was generally of a high standard in the areas reviewed and where third party support was needed consideration had been given within their BCPs.

✓ Of the four individual Business Units reviewed we found three to be following the guidelines set out by the BCM programme;

✓ There are processes and procedures in place for testing and maintaining the BCM programme;

✓ In the areas reviewed key personnel responsible for BCM have been identified at all levels regarding BCM; and

✓ The link between BCM and IT disaster recovery has been considered.

1.3 Areas for improvement

Through discussions with key members of staff and a review of available documentation we found that overall the Council have made good progress in implementing BCM. However, we did identify a number of areas where the Council could improve on existing processes.

• Testing of the Corporate Business Continuity Plan and training of key personnel

The plan has now been finalised and distributed to relevant staff. However, it is our understanding that the above Plan has yet to be exercised and key personnel trained in the Plan.

• Internal Audit

From our review and discussion with the Risk Management Unit it is our understanding that three of six key recommendations made by IA are still outstanding. In addition, we found that no defined agreed timescales had been identified for the recommendations to be actioned.

• East Moor BCP

The BCP for East Moor is currently in draft format and is yet to be approved. The fit for purpose review has yet to be carried out by the RMU. Without a clear link between the BCP and the overall BCM programme there is a risk that important processes and procedures identified in East Moor's BCP, the Corporate BCP and Business Continuity Framework, will not be synchronised to ensure that the best action is taken if or when the East Moor BCP needs to be invoked.

• Availability of testing documentation for audit review.

During our review we were unable to obtain evidence whether the business continuity exercise carried out 6 months ago was successful.

2 Introduction

2.1 Background

Leeds City Council (the Council) has in place a BCM policy to ensure it can continue to deliver its key services to the community in the face of disruptions to their operation. In addition, the Risk Management Unit (RMU) has developed the 'Leeds BCM Framework' to help ensure that robust and consistent BCM arrangements are implemented and tested at corporate and service levels.

2.2 Objectives and scope of our review

Our objective was to gain an understanding, and provide an assessment on, the current status of the BCM programme at the Council.

Our audit objectives are detailed below:

- Gain an understanding and provide an assessment on the current status of the BCM programme at the Council;
- Review the current BCM programme and associated plans/policies to identify whether good practice has been followed;
- Gain an understanding of the processes and procedures the Council has in place when considering third party support/partnerships regarding BCM;
- Determine whether the individual business units are following the guidelines set out by the BCM programme and have a clear understanding of their roles and responsibilities within the overall programme;
- Determine whether the Council has in place adequate processes and procedures for testing and maintenance of the BCM programme;
- Identify whether an adequate awareness and training programme has been developed by the Council for BCM;
- Identify whether the Council's Internal Audit function or independent body carry out impartial reviews on BCM against defined standards and policies;
- Identify whether key personnel have been identified at all levels and continuous training is available and carried for the above personnel; and
- Consider the links between BCM and the IT Disaster Recovery plan.

2.3 Audit approach

Our approach has included:

- Reviewing key documents;
- Interviewing key staff at the Council body; and
- Providing constructive challenge and support.

To determine whether individual business units are following the guidelines set out by the BCM programme and have a clear understanding of their roles and responsibilities within the overall programme we randomly selected four critical services from the overall Critical Services List. Furthermore, it was agreed that the review would look at Consolidated Critical Services (CCS) and Single Critical Services (SCS).

The definition being;

Consolidated Services – where a number of additional operational services exist to provide a specific critical service.

Single Service – main services which are self sufficient.

2.4 Acknowledgements

We would like to take this opportunity to thank all those staff who have supported this review.

3 The Business Continuity Management Programme (BCM)

3.1 Introduction

To gain an understanding and to provide an assessment on the current status of the BCM programme at the Council we interviewed key personnel from the Risk Management Unit (RMU). In addition, we acquired and reviewed documentation in connection with the BCM programme that was available to us at the time of our review.

3.2 Understanding

The Council has in place a BCM policy which is designed to reinstate its key services to the community to an acceptable level in the face of a unexpected disruptions. In addition, the RMU has developed the 'Leeds BCM Framework' to help ensure that robust and consistent BCM arrangements are implemented and tested at corporate and service levels.

The RMU is responsible for coordinating work around BCM at the corporate level and is able to provide advice and guidance to officers face-to-face or by telephone, e-mail or the 'Risk Management and BCM Interest Area' on the Council's Intranet site. In addition the RMU is also responsible for developing the BCM Strategy setting out how the principles of the BCM Policy are implemented and what the milestones for achieving this are.

The RMU has developed a BCM Framework which encourages consistent arrangements to be implemented, followed and tested at all levels.

The BCM Framework encompasses the following three sections:

- A BCM Policy – that outlines the purpose and principles of BCM and states the Council's commitment to establishing robust BCM across the Council;
- A BCM Strategy – that sets out how, when and by whom BCM arrangements are to be implemented; and
- A BCM Toolkit – that encompasses a range of useful advice and guidance for officers to develop BCM arrangements within their own service areas.

A final draft of the Corporate Business Continuity Plan (the Plan) had been developed and had been through consultation with the Corporate Risk Management Group at the start of our review. It has now been finalised and distributed to relevant staff. However, management have informed us that the Plan has yet to be exercised and key personnel trained in the Plan.

3.3 Assessment

Through review and discussion with key members of staff the current status of the BCM programme provides a well structured and organised framework that is actively being reviewed and updated to reflect the current status of identified critical services.

Recommendation 1

The Council should consider the following:

• Now that the Corporate Business Continuity Plan (the Plan) has been developed and approved it should be formally tested and success and failures recorded and the Plan updated according to the results of the exercise;

• Thereafter the Plan should be formally tested on a periodic basis to give the Council assurance that all processes and procedures within the plan coincide with the Council's current working environment and adheres to legal and regulatory requirements. Therefore if an incident occurs the Council would have confidence that the Plan can be invoked in a timely and efficient manner; and

• Furthermore, all key personnel should initially be trained to gain an understanding of the Plan and its link to the Major Emergency Plan and thereafter formal periodic updates should be provided to those personnel if and when changes are made to the Plan.

4 BCM plans and policies

4.1 Introduction

To understand and identify whether good practice has been followed by the Council to achieve their desired goals in implementing a robust and well structured BCM programme we used the following good practice guidelines and methodology to determine that good practice was followed and to identify any gaps:

Below is a brief summary of the reason why we used the following areas of expertise:

Business Continuity Institute (BCI) Good Practice Guidelines.

"The Business Continuity Institute (BCI) was established in 1994 to enable individual members to obtain guidance and support from fellow business continuity practitioners. The BCI currently has over 4000 members in approximately 85 countries".

The BCI defines Business Continuity Management (BCM) as: "an holistic management process that identifies potential impacts that threaten an organisation and provides a framework for building resilience and capability for an effective response that safeguards the interests of its key stakeholders, reputation and value creating activities".

"The wider role of the BCI and the BCI Partnership is to promote the highest standards of professional competence and commercial ethics in the provision and maintenance of business continuity planning and services. The BCI is the world's most eminent BCM institute and our name is instantly recognised as standing for good practice and professionalism".

We used the guidelines because have been written and compiled by BCI members with the following aim: "to provide a generic framework for successful Business Continuity Management by providing an approach, which a BC practitioner can use to inform his or her own business programme. The BCI Good Practice Guidelines are designed to provide assistance in understanding through the application of six Business Continuity Management stages".

In addition "the guidelines aim to be applicable to all organisations, regardless of size or industry sector, and are intended for use by business continuity management practitioners, risk managers auditors and regulators".

KPMG BCM Methodology.

The KPMG methodology was recently published by the British Bankers Association as a good practice guide for their membership and is aligned to the 10 core competencies of the Business Continuity Institute.

KPMG is a members of the lead development team for the British Standard Institute's UK code of practice for business continuity management (BS 25-999) which ensures that the firm's continually improving its approach and methodology whilst promoting good business continuity practice across the industries and beyond.

4.2 Review

To review the current status of BCM we acquired the current plans and policies and discussed key areas with members of RMU. The Council has been conducting a significant BCM programme over the past year and have developed and implemented a BCM programme designed to allow the Council to react to unexpected incidents that may have an affect on their critical services.

The following is a brief overview of the key policies and plans we reviewed to determine whether good practice was followed:

Corporate Business Continuity Plan (the Plan)

The Plan is structured into four main sections covering the following areas:

- *General information* – Purpose of the Plan, Scope of the Plan, Link to the Major Emergency Plan and Other Related Procedures;
- *Control* – Overview of Co-ordination Arrangements, Responsibilities of Key Officers and Team, Emergency Management Team (EMT), Tactical Control Team (TCT), Directorate Incident Support Teams, Emergency Communication Team and Informing Elected Members;
- *Action* – Overview of Incident Management Process, Activation and Trigger Levels, Alert and Call-out, Actions by Key Players and Team, Chief Executive, Emergency Management Team and Tactical Control Team; and
- *Appendices* – Contacts List, Incident Log, Incident Management Checklist and Action Checklists for key players and teams.

Business Units Business Continuity Policy (BCP)

The individual BCPs are structured into five main sections covering the following areas:

- *Aim of the BCP* – discusses the broad aim, the specific principal objectives for undertaking BCM;
- *Scope of the Policy* – discusses what the policy is about, how BCM is defined within the policy, what aims to ensure, what the policy forms part of and how it has been developed to be consistent with the objectives and content of other key policies;
- *Description of the BCM Policy* – discusses the terms of the basic principles which underpin the Council's approach to BCM;
- *Statutory & Regulatory Responsibilities* – discusses The Civil Contingences Act (2004) that provides the statutory underpinning for BCM. Within this legislation, local authorities are defined as 'Category 1' or 'Core Local Responders' with the Council having certain duties to carry out.
- *Roles and Responsibilities for BCM* – discusses the roles and responsibilities of key personnel within the Council: Executive Board, Corporate Governance and Audit Committee, Corporate Risk Management Group, Corporate Leadership Team, Directors / Chief Officers, Risk Management Unit, Enabling Roles and key enabling services such as: ICT Services, Corporate Human Resource, Facilities Management and Communication Team.

Business Continuity Management Framework (the Framework)

The Framework was developed by the Council's RMU department to encourage a consistent approach when Framework arrangements are implemented and tested at the corporate and service levels. The Framework comprises and discusses the following three sections:

- A BCM Policy which outlines the purpose and principles of BCM and states the Council's commitment to establishing robust BCM across the Council;
- A BCM Strategy which sets out how, when and by whom BCM arrangements are to be implemented; and
- A BCM Toolkit which encompasses a range of useful advice and guidance for officers to develop BCM arrangements within their own service areas.

4.3 Conclusion

We found that the plans and policies that the Council had developed and had in use at the time of our review were well structured and detailed. The documents show that the Council has adopted good practice guidelines set out by the Business Continuity Institute and has used this methodology and lifecycle to develop their own BCM programme.

The Council has adopted a structured approach in developing and implementing their BCM programme. Therefore it is our understanding that good practice is being followed in the creation and implementation of the Council's BCM plans and policies.

5 Third party support and partnerships regarding BCM

5.1 Introduction

Our objective in this area was to gain an understanding of the processes and procedures the Council has in place regarding third party support for their individual Business Units (BU) in the event of an incident and whether these processes and procedures have been adequately identified and documented within individual Business Unit Business Continuity Plans (BCP).

5.2 Review

Through a review of documentation and discussion with individual members of staff from the chosen Business Units we found that, in the main, the Business Units appear to be self-sufficient. Where third party support would be needed to assist in an incident we found that contact information had been included in the BCP such as name of the organisation and contact details including out of hour details and their role in the plan. Examples of independent bodies that may provide support include:

- Building Agency – Asbestos Management;
- Building Agency – Legionella Risk Monitoring Works; and
- Health & Safety Executive.

The above examples were taken from the Property Section – Social Services Department BCP.

On review of individual BCPs we found that attached to each plan was an Incident Management Process flow diagram, an Incident Management Checklist and Contact Information list outlined above including key personal contact details and their individual role in the plan.

Through discussion and review we found that the four in-scope Business Units we reviewed were able to demonstrate when and how they would use the processes and procedures available to them and had taken into consideration their third party support expertise needed to assist individual service areas in an incident.

5.3 Conclusion

We found that third party support for individual Business Units was planned where considered necessary by local management.

6   Testing and maintenance of the BCM programme

6.1 Introduction

RMU are also tasked with carrying out periodic test (walkthrough exercises) of individual Business Units BCPs.

6.2 Review

The Council has a number of documented processes and procedures that cover testing and maintenance of the BCM programme. The information given below has been taken from documents provided by the Council for the purpose of our review:

● RMU Business Continuity Planning Exercise

This is a documented process for carrying out tests on individual business units to check procedures for accuracy and that the BCP contents are fit for purpose. Key personnel from the service area need to be available to explain processes and procedures and possible outcomes of actions.

The walkthrough exercise is based on a scenario (or multiple scenarios) created in advance of the exercise and covers the whole of the BCP in detail without calling upon any resources.

The walkthrough team will consist of individuals key to the management of incidents and recovery services. Timescales for the exercises should take into consideration the size and depth of the BCP.

● Critical Services Exercise Schedule

The schedule identifies all of the critical services for the Council, Chief Officer contacts, business continuity contacts, date the BCPs were completed, date the BCPs was exercised, future test dates and RMU comments. In addition the schedule categorises the criticality of the individual services.

● Post Incident Review (PIR) Notes

This document advises key personnel on areas that need to be considered, questions asked and issues addressed through the post incident review process.

● 6.3 Conclusion

From discussions and a review of available documentation, the processes and procedures in place at the time of our review in respect of testing and maintenance were considered to be adequate.

7 Awareness and Training Programme

7.1 Introduction

The Risk Management Unit (RMU) is responsible for co-ordinating work around BCM at the corporate level and is able to provide advice and guidance to officers face-to-face or by telephone, e-mail or the 'Risk Management and BCM Interest Area' on the Council's Intranet site. RMU facilitate training and awareness regarding BCM to key personnel who have responsibilities around business continuity management.

7.2 Review

Key personnel

From the review of the four chosen business units and discussion with key members of staff we concluded that the four business units have identified key personnel in regards to BCM.

Awareness and training programme

It is our understanding that BCM training is not mandatory at the Council for key personnel interviewed during this review who would be involved in business continuity incident. An awareness and training programme for BCM is in place at the Council and there are a number of packages available to deliver the training. The key packages are:

BCM training package – management processes which enable the organisation to identify and evaluate the potential impact of disruptions to its services from various sources and form the basis to develop appropriate strategies for responding to such incidents.

BCP training package – ongoing processes of identifying the potential threats to the delivery of the Council's services, assessing their impacts and probabilities and developing and implementing plans and strategies.

In addition to the above management have informed us that training is available on the Council's Intranet, adhoc guidance is available by phone from RMU, presentations have been given at a departmental level regarding BCM. There has also been training for elected members and an away day held for the RMU and Corporate Leadership Team where there was an update on BCM.

7.2 Conclusion

Through review and discussion with management, we identified that training regarding BCM is in place and documented with good practice being followed in a number of areas.

8   Internal Audit

8.1 Introduction

The Council has an Internal Audit (IA) function that carries out independent reviews of BCM. Within the 2007-08 year IA carried out a review of BCM. The review was of business continuity arrangements and was associated with the risk that business continuity arrangement for critical services are inadequate in the event of an internal or external major disruption or incident.

8.2 Review

A final report was issued in July 2007 with the following audit opinion given:

- moderate assurance given for the control environment (there are some weaknesses in the control environment); and

- moderate assurance given for compliance (the control environment has mainly operated as intended although errors have been detected).

Through discussion and review of the report we found that IA had made six key recommendations which were:

- Full supporting evidence should be produced and retained to support the assessment, challenge and approval processes undertaken, when assessing business continuity;

- Following the completion of future BIA the Council should ensure that a risk assessment is undertaken;

- RMU should consider the benefits of prioritising the outstanding business critical services and ensuring that the most critical services have plans developed first;

- The Corporate Business Continuity Plan should continue to be finalised and challenged at the appropriate forums and communicated to all key stakeholders;

- Each service level business continuity plan owner should maintain a change log to evidence any amendments made to the plan; and

- Consideration should be given to making continuing professional development (CPD) a mandatory requirement for all officers working in the Risk Management Unit

8   Internal Audit (continued)

8.3 Conclusion

From our review and discussion with the RMU it is our understanding that three of six key recommendations made by IA are still outstanding. In addition, we found that no defined agreed timescales had been identified for the recommendations to be actiond:

Outstanding IA recommendations:

Recommendation 1

- Full supporting evidence should be produced and retained to support the assessment, challenge and approval processes undertaken, when assessing business continuity.

Update

• In progress

Recommendation 2

Update

• In progress

- Following the completion of future BIA the Council should ensure that a risk assessment is undertaken.

Recommendation 6

- Consideration should be given to making CPD a mandatory requirement for all officers working in the Risk Management Unit.

Update

• open – management have informed us that currently there is no budget in place to accommodate mandatory CPD requirement.

Recommendation 2

The Council should ensure that all recommendations that have been made and agreed to between Internal Audit and the Business are actioned within agreed timescales.

Introduction to individual Business Unit review

Background

To determine whether individual business units are following the guidelines set out by the BCM programme and have a clear understanding of their roles and responsibilities within the overall programme, we randomly selected four critical services from the overall Critical Services List. It was agreed that from each Business Unit area chosen we would review the Consolidated Critical Service and Single Critical Service.

The definition being;

Consolidated Critical Services (CCS) – where a number of additional operational services exist to provide a specific critical service.

Single Critical Service (SCS) – main services which are self sufficient.

The following four Critical Services were chosen:

- Corporate Property management (CCS)
- Corporate Property management (SCS)
- Adult Services (CCS)
- Adult Services (SCS)
- Children Services (CCS)
- Children Services (SCS)
- ICT Services (CCS and SCS)

The following sections discuss in detail the individual services reviewed.

9 Corporate Property Management [Consolidated Critical Service]

9.1 Background

The Corporate Property Management CCS is responsible for the following:

- Day to day reactive maintenance repairs;
- Out of hours emergency repairs service;
- Asbestos and Legionella Risk; and
- Water Management.

9.2 Review

Through discussion with management we found that there is a formal documented Business Continuity Plan (BCP) in place. The plan had been approved and was recently revised. Management have informed us that the RMU were involved in the development of the BCP.

Through discussion with key members of the business unit we found that they were knowledgeable and experienced in carrying out their day to day duties and have a clear understanding of their roles and responsibilities within the overall BCM programme. Management have informed us that all key members of staff who would be called upon if an incident occurred have access to a copy of the BCP.

A Business Continuity planning exercise was carried out in April 2007. The RMU was responsible for carrying out the exercise and key members of the Business Unit were involved. The purpose of the exercise was to identify whether procedures were accurate and that the BCP content was fit for purpose.

The exercise consisted of checks on certain areas and included a scenario based exercise on specific incidents i.e. loss of people due to illness, loss of IT systems and building evacuation. Each scenario lasted approximately 20 minutes and a report produced on the outcome of the exercise giving conclusion and recommendations.

The following conclusion from the Business Continuity planning exercise was given: The Head of Property was an experienced manager with a great deal of knowledge in managing incidents. The BCP was used to good affect with particular use of contact details and the pre-agreed contingencies. Minor amendments were made on the day.

9.3 Conclusion

From a review of available documentation and discussions with management we can conclude that guidelines are being followed and that staff have an understanding of their roles and responsibilities.

10 Corporate Property Management [Single Critical Service]

10.1 Background

The Corporate Property Management SCS is responsible for the following:

- Resilience and emergency procedures for Council buildings.

10.2 Review

Management have informed us that currently there are three separate BCPs for the following areas: Civic Buildings, Social Services and Leisure Services. However the above areas are being restructured and by October 2008 they will be known as Corporate Property Management under one BCP.

From our review we found that a documented BCP plan exists for the Business Unit in its current state. The BCP had been approved and key members of the team are aware of their role and responsibilities within the overall BCM programme.

It is our understanding that training on BCM is not mandatory. However management felt that there was an adequate training programme in place. Training and awareness on BCM is also picked up during the induction process.

A Civic Building Incident Escalation Procedure is in place. The procedure documents the steps to be followed after an incident that affects the provision or occupation of a Council building.

A Business Continuity Planning exercise was carried out by the RMU team on November 2007. The exercise consisted of checks on certain areas and included a scenario based exercise on specific incidents i.e. power failure, burst water pipe, at Merrion House causing extensive damage which meant loss of access for a minimum of 5 days and fire damage within a building with loss of access twenty four weeks. Each scenario lasted approximately 15 minutes and a report produced on the outcome of the exercise giving conclusion and recommendations.

The following conclusion from the Business Continuity planning exercise was given: the scenarios posed to the Incident Management Team were managed quickly and effectively with due regard to the BCP incident management process. The RMU made some minor recommendations and requested they be undertaken as soon as possible. Management have informed us that these were actioned.

10.3 Conclusion

The guidelines set out by the BCM programme are being followed and the staff interviewed have an understanding of their roles and responsibilities within the overall programme.

11 Adult Services [Consolidated Critical Service]

11.1 Background

The Adult Services CCS is responsible for the following:

- Social Work Assessment and Care Management (conducting assessments of adults who are at risk or vulnerable, determining a care package of suitable services, putting these in place and monitoring/reviewing them.

- Client groups include adults at risk of abuse/neglect, adults with physical or learning disabilities or mental health problems, and the frail elderly). Community Support (providing direct services to vulnerable adults and their carers, to meet the assessed needs referred above).

- Emergency Duty Team and Approved Social Workers (Mental Health) – responding to high risk of life and limb situations arising outside of office hours.

11.2 Review

There is a formal documented BCP in place. The plan was developed with the assistance of the RMU and has been approved. Management have informed us that members of staff were skilled in handling emergency situations on a daily basis and that most of the staff are part of the risk and emergency unit. In addition, management have informed us that the current BCP has been distributed to all managers.

Management have informed us that a Business Continuity Planning exercise was carried out by the RMU team in the last 6 months and included key members of the Business Unit. It is our understanding that the exercise consisted of checks on certain areas which included a scenario based exercise on specific incidents.

11.3 Conclusion

From discussion with management and review of the BCP we can determine that the above business unit is following guidelines set out by the BCM programme. However, the business continuity exercise report was not available at the time of our review for us to evidence and comment whether the exercise was successful and the BCP was fit for purpose.

Recommendation 3

All BCP reviews and test documents identifying success and failures should be retained so that they can be retrieved as evidence in the event of external reviews to ensure assurance is not reduced through lack of evidence.

12 Adult Services [Single Critical Service]

12.1 Background

The Adult Services SCS is responsible for the following

- Residential homes (providing round the clock care to disabled or frail adults, usually on a medium to long-term basis, but often for respite periods only).

12.2 Review

Management have informed us that the current BCP is in place and has been approved. We have been informed that the current plan looks at the Service as a whole and not individual establishments (residential homes). In addition to the overall BCP it is our understanding that there are individual plans such as a plan to move people from residential homes to a dedicated day centre in an emergency.

There is an out of hours emergency unit that has access to contact numbers for key personnel in Adult Services. Contact details of key staff are also held by the police. It is our understanding that there is no specific training on BCM given to staff.

A Business Continuity Planning exercise was carried out by the RMU team on February 2008. The exercise consisted of checks on certain areas and included a scenario based exercise on specific incidents i.e. staff illness, burst water pipe Merrion House causing an evacuation of the building and small fire within one of the residential homes causes damage to the internal fabric of the building.

Damage assessment and repair operation means that the occupiers are unable to occupy for an estimated period of 24 weeks (minimum). The following conclusion from the Business Continuity planning exercise was given with minor recommendations: The scenarios posed were managed well by the 2 Principal Unit Managers using their own skills and knowledge of the organisation and their considerable combined experience.

12.3 Conclusion

Through a review of available documentation and discussions with key staff we determined that the business unit is following the guidelines set out by the BCM programme and staff appear to have an understanding of their roles and responsibilities within the overall programme.

13 Children Services [Consolidated Critical Service]

13.1 Background

The Children Services CCS is responsible for the following:

Social Work Assessment and Care Management (conducting assessments of children who are at risk or vulnerable, determining a care package of suitable services, putting these in place and monitoring and reviewing them). Client groups include:

- children at risk of abuse/neglect;
- children with physical or learning disabilities or mental health problems;
- Community Support (providing direct services to vulnerable children and their carers, to meet the assessed needs referred above); and
- Emergency Duty Team/Approved Social Workers (Mental Health) – responding to high risk/life and limb situations arising outside of office hours.

13.2 Review

There is a documented BCP which has been approved. A Business Continuity planning exercise was carried out in January 2008. The RMU was responsible for carrying out the exercise and key members of the Business Unit were involved. The purpose of the exercise was to identify whether procedures were accurate and that the BCP content was fit for purpose.

The exercise consisted of checks on certain areas and included a scenario based exercise on specific incidents i.e. loss of people due to illness, and evacuation of premises. Each scenario lasted approximately 20 minutes and a report produced on the outcome of the exercise giving conclusion and recommendations. Minor recommendations were made and management have informed us that these were rectified.

Management have informed us that individual staff are experienced and capable of coping with emergencies and they do understand their roles and responsibilities within the overall BCM programme.   The Business Unit is dependent on IT because key information on individual children resides on the Electronic Social Care Resource (ESCR) system and if this system was unavailable it would cause significant operational difficulties.

We have been informed that training is available and has been carried out at management level however individual field level training on BCM is not carried out.

13.3 Conclusion

Through a review of available documentation and discussions with key staff we determined that the business unit is following the guidelines set out by the BCM programme and staff have an understanding of their roles and responsibilities within the overall programme.

14 Children Services [Single Critical Service]

14.1 Background

The Children Services SCS is responsible for the following:

East Moor secure unit providing round the clock care to children.

14.2 Review

There is Major Incident Plan (BCP) in place however, it is currently in draft format and in the process of being approved. Through discussion with management it our understanding that they have met with the RMU to discuss the Council's BCP template.   After review of the BCP template management at East Moor found that it was more suitable to an office environment then to a liven environment similar to East Moor. As stated within the BCP document "the plan has been designed using guidance issued by the Council's RMU as well as advice issued by the Youth Justice Board and OfSTED".

Furthermore, through discussion with Management it is our understanding that the format of the BCP does not follow that advised by the RMU, and the BCP is presented in a style that all staff within East Moor irrespective of their roles and responsibilities can understand and use with speed and security in mind.

It is our understanding that Management at East Moor have not had contact with the RMU for approximately a year and have informed us that the RMU may not have had sight of the BCP.

Management have informed us that individual staff are experienced and capable of coping with emergencies and they do understand their roles and responsibilities within the BCP.   In addition incident procedures are tested on a regular basis and staff are trained business continuity within the induction process.

14.3 Conclusion

Although there is a BCP in place and formal processes and procedures are in place alongside staff experienced in the handling of incidents at East Moor, we have made the following recommendation to further improve the effectiveness of controls in this area.

Recommendation 4

East Moor Management and the RMU should work together to ensure that the Business Continuity planning exercise, used to determine whether individual Business Unit BCPs are fit for purpose, is carried out as soon as possible to determine whether the current East Moor BCP is fit for purpose and the results from the review should be used to assist in the approval process of the BCP.

Furthermore, once the BCP is in place all key personnel should be trained to ensure that they understand their roles and responsibilities within the overall BCM programme.

15 Link between BCM and the IT Disaster Recovery Plan

15.1 Background

The ICT Services manage the following areas:

- UNIX environment to maintain resilient, available service;
- Wintel environment to maintain resilient, available service;
- Security of systems to protect unauthorised access to Council ICT;
- Anti-virus protection to protect Council ICT from computer viruses;
- Desktop environment to maintain resilient available service;
- Data network to maintain resilient available service;
- Voice network to maintain resilient available service;
- Servers, SAN's and corporate backup to maintain resilient, available service; and
- Hardware repair and replacement via 3rd party company.

15.2 Review

ICT Services and the RMU work together to develop a BCP that would comply and have a clear link to the Council's overall BCM programme. This was carried out in March 2007. In April 2007 the RMU carried out a desk based BCP test for the whole of technical services. A report was produced and we understand that the recommendations were implemented. Management have informed us that in January 2008 they had to invoke the DRP because water leaked into the computer room in the Apex Centre.

They carried out a post incident review and one of the main issues was that the ICT Services did not have an over arching BCP. This was created and now includes all ICT areas. The approved plan is now in place. Management have informed us that Disaster Recovery (DR) trials are now underway and ongoing. It is our understanding that individual Business Units that are involved in ITDR testing must sign off on the test once completed. In addition to ensure IT systems critical to individual Business Units in an incident are covered by the overall ITDR plan a ICT Statement of Services Requirements document must be completed.

15.3 Conclusion

From a review of available documentation and discussions with key members of ICT Services we determined that there was a link between BCM and the IT Disaster Recovery plan.

Appendix 1: Recommendations and Action Plan

***	Significant residual risk	**	Some residual risk	*	Little residual risk
	Recommendation	**Priority**	**Management response**		**Responsibility and timescale**
1	The Council should consider the following: • Now that the Corporate Business Continuity Plan (the Plan) has been developed and approved it should be formally tested and success and failures recorded and the Plan updated according to the results of the exercise; • Thereafter the Plan should formally be tested on a periodic basis to give the Council assurance that all processes and procedures within the plan coincide with the Council's current working environment, adheres to their legal and regulatory requirements and consequently if an incident occurs the Council would have confidence that the Plan can be invoked in a timely and efficient manner; and • All key personnel should initially be trained to gain an understanding of the Plan and its link to the Major Emergency Plan and thereafter formal periodic updates given to those personnel if and when changes are made to the Plan.	**	**Agreed** 1.1 Corporate BC arrangements were tested with the Council's Major Emergency Plan (MEP) as part of an annual Emergency Planning and BCM Corporate Leadership Team Away Day 24/7/08. The next Away Day is scheduled for July 09 where the Corporate BC Plan and the linkages between this and the MEP and MEP will be exercised and changes made to the Plans as appropriate. 1.2 BC training on the Corporate BC Plan and supporting Directorate BC Framework will be scheduled for the coming year.		1.1 Responsibility: Peace & Emergency Planning Unit (PEPU) Timescale: July 2009 1.2 Responsibility: BC Officer Timescale: 2009
2	The Council should ensure that all recommendations that have been made and agreed between Internal Audit and the Business are actioned within agreed timescales.	**	**Agreed** 3 recommendations from Internal Audit's review are considered to be outstanding so responses are provided for each below.		

Appendix 1: Recommendations and Action Plan (continued)

***	Significant residual risk	**	Some residual risk	*	Little residual risk
	Recommendation		**Priority**	**Management response**	**Responsibility and timescale**
				2.1 Full supporting evidence should be produced and retained to support the assessment, challenge and approval processes undertaken, when assessing business continuity.	2.1 Responsibility: BC Officer Timescale: ongoing
				Response: agreed for those minutes taken by the BC Officer.	
				Internal Audit's (IA) comment was made in reference to the initial reviews and agreements made by CRMG and CLT as to what are the Council's critical services. IA noted that the CRMG minutes did not detail the level of challenge undertaken and that the CMT (as CLT was called) minutes were also not detailed enough.	
				CLT minutes are not within the remit of the Business Continuity function, but it is agreed that any minutes taken or other documentation drawn up by the BC Officer in future that relate to such important matters (whether this is at CRMG or another forum) should be more detailed.	
				2.2 Following the completion of future BIA the Council should ensure that a risk assessment is undertaken.	2.2 Responsibility: BC Officer Timescale: next corporate-wide BIA
				Response: this will be given due consideration when the next full BIA is undertaken.	

***	Significant residual risk	**	Some residual risk	*	Little residual risk
	Recommendation	**Priority**	**Management response**		**Responsibility and timescale**
			2.3 Consideration should be given to making CPD a mandatory requirement for all officers working in the Risk Management Unit. *Response*: This is already a mandatory requirement for all RMU staff through their job descriptions.		N/A
3	All BCP reviews and test documents identifying successes and failures should be retained so that they can be retrieved by management as evidence to demonstrate that the continuous improvement process is effective.	**	**Agreed** In the past, the BC Officers have relied on service areas maintaining their own documentation. However, it has already been recognised within the RMU that such maintenance does not always take place. When a new BC Officer is in post, it is agreed that they will retain copies of BC Plans and test documentation.		Responsibility: BC Officer Timescale: ongoing
4	East Moor Management and the RMU should work together to ensure that the Business Continuity planning exercise used to determine whether individual Business Unit BCP are fit for purposes is carried out as soon as possible and the results from the review should be used to assist in the approval process of the BCP.	**	**Agreed** The RMU will provide comments to the East Moor Centre manager highlighting the gaps and duplications in their draft BC Plan to enable his revisions. Assistance will be provided to the Centre Manager to test the Plan once he is in a position to do so.		Responsibility: initial comments – the RMU. Testing and training – East Moor Secure Unit with the assistance of the BC Officer Timescale: initial comments by mid-Nov 08. Testing and training: subject to when East Moor Secure Unit's Plan and staff are ready.

Appendix 1: Recommendations and Action Plan (continued)

***	Significant residual risk	**	Some residual risk	*	Little residual risk
	Recommendation	**Priority**	**Management response**		**Responsibility and timescale**
4	Furthermore, once the BCP is in place all key personnel should be trained to ensure that they understand their roles and responsibilities within the overall BCM programme.	**	The training of key personnel is essentially the responsibility of East Moor Secure Unit but the RMU will ensure that they are made aware of this recommendation. Further, the testing of the Plan will incorporate the training of key staff.		