

**INTERIM INDEPENDENT AUDIT COMMITTEE
28 MARCH 2013**

SUBJECT		BUSINESS CONTINUITY (INCLUDING THE AUDIT OF FCR RECOVERY ARRANGEMENTS)
REPORT BY		CHIEF CONSTABLE
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SUMMARY AND PURPOSE OF REPORT To provide an overview of the current position of Lincolnshire Police in relation to the development of effective Business Continuity Management arrangements. To provide an update on progress in relation to implementation of the action plan arising out to the Audit of Business Continuity arrangements for Police Headquarters in April 2012.		
RECOMMENDATIONS		That: 1. the position statement is noted; 2. the work to develop BCM arrangements continues to be regarded as a priority and receive appropriate investment and management support; 3. the positive progress around BCM arrangements is noted and that the Action Plan related to the 2012 Audit is regarded as completed; 4. the recommendations made in the 2013 RSM Tenon Audit Report of BCM arrangements in FCR should be accepted as valid but subjected to a feasibility study and cost benefit analysis before referral to BCM Board for a decision regarding whether each recommendation should be implemented.

A. SUPPORTING INFORMATION

1. INTRODUCTION AND BACKGROUND

- 1.1 Force activity to develop effective Business Continuity Management (BCM) arrangements is ongoing, and some positive progress can be reported.
- 1.2 BCM activity is guided by Force BCM Policy and in particular the BCM Board chaired by ACC (Protective Services). Activity and progress is scrutinised by the OPCC.

- 1.3 BCM activity includes ongoing Business Impact Analysis (BIA) and risk assessment, development of planned BC strategies and response arrangements, periodic audit of specific or general BCM arrangements, training and exercise activities as well as activity to embed BCM arrangements within day to day management of the Force.
- 1.4 During the last 2 years, all areas of the Force have been subjected to initial BIA. High priority areas for BCM to be applied have been identified in FCR, ICT Servers and networks and adjustments related to Force re-structure and implementation of strategic partnership arrangements. In addition a general effort to embed BCM in organisational culture and expand coverage of basic BC Plans has been led by ACC (Protective Services). It is accepted that ongoing reorganisation already means some departments / business area names have changed but many plans of BIA findings remain valid.
- 1.5 Training, exercise and plan maintenance activity is ongoing. Most recent high profile activity has been a table top style exercise held on 14 March 2013 covering most HQ based Departments / Business Units. The exercise focussed on two high risk areas, namely loss of the HQ Main Building and Loss of ICT Network. Early results indicate the exercise has met its objectives of increasing awareness, validating and aiding improvement of planned BC Incident Response arrangements. This exercise adds to the pool of knowledge and experience that aid ongoing development of force BCM arrangements. A further significant exercise focussed upon operational policing business areas outside HQ is planned for June 2013.
- 1.6 Other significant exercises and incidents that have developed capability have been the enforced re-location of FCR for refurbishment, BC Incidents encountered during severe winter weather, storms during Olympic Torch Relay and Exercise Watermark 2012.
- 1.7 Two formal Audits in high risk areas have been conducted. Firstly, in April 2012 an audit of non ICT focussed BC arrangements covering Force Headquarters took place. Secondly, in Jan 2013 a subject specific audit of the IT disaster recovery arrangements for the Force Control Room was completed. Both audits were conducted by RSM Tenon. These audits produced a number of recommendations.
- 1.8 Overall it can be reported there is significant ongoing activity to develop BCM arrangements in the Force. Good progress has been made and the resilience to impacts and capability to respond and recover from incidents is improving.
- 1.9 There are four recommendations arising from the January 2013 audit. To date it has not been possible to consider those in detail to enable decisions to be made regarding how they should be progressed. Each recommendation appears valid given the evidence and implementation may add to overall BCM arrangements. However the recommendations require consideration alongside other priorities to evaluate whether the investment of resources required to implement them is appropriate.

2. AUDIT FINDINGS AND COMMENT

- 2.1 The 2012 audit provided valuable information which helped the BCM Board and relevant managers make informed decisions about what action should be taken to reduce the risks to Business Continuity and Disaster Recovery relating to HQ based Departments and Business Units.
- 2.2 The most recent update or progress against those actions is attached (Annex 1). It is recommended that these actions be regarded as 'completed'. Some of the actions remain ongoing as part of normal ongoing BCM activity and are therefore embedded in ongoing BCM.
- 2.3 The 2013 audit provided valuable information including four recommendations which should help the BCM Board and relevant managers make informed decisions about what action should be taken to reduce the risks to Business Continuity and Disaster Recovery relating to the FCR.
- 2.4 Whilst the audit report contents, including the recommendations provide data about the risks and current control measures it does not provide data about the potential cost of implementing the proposed measures.
- 2.5 It is proposed that the recommendations are accepted as valid, that further work is undertaken using current resources to evaluate potential costs of full implementation and that the matter is referred to the BCM Board for a decision regarding future actions.

B. FINANCIAL CONSIDERATIONS

The cost of ongoing BCM is significant. Approximately half of one FTE G Grade staff member's time is committed to BCM Management / Coordination activity. Other force managers also commit part of their time to related activity. Investment in ICT, building resilience and redundancy and development of response capabilities consumes significant proportions of current budgets.

The costs of implementing current arrangements should be met from within current resources. Where significant future expenditure is required this should be subject to consideration by relevant budget holders or submission of business cases as required.

C. LEGAL AND HUMAN RIGHTS CONSIDERATIONS

The provision of internal audit services is one of the means by which the Police and Crime Commissioner discharges his responsibilities to secure the maintenance of an efficient and effective police force under section 1 (6)(b) of the Police Reform and Social Responsibility Act 2011, and the Chief Finance Officer meets her responsibilities under section 151 of the Local Government Act 1972, section 73 of the Local Government Act 1985 and section 112 of the Local Government Finance Act 1988 for ensuring the proper administration of the Commissioner's financial affairs.

D. PERSONNEL, EQUAL OPPORTUNITIES AND DIVERSITY ISSUES
(including any impact or issues relating to Children and Young People.)

There are no identified significant impacts relating to these issues.

E. REVIEW ARRANGEMENTS

The progression of the recommended actions should be monitored by the Chair of the Force BCM Board, the Assistant Chief Constable (Protective Services). The chair of the BCM Board will report progress and future recommendations to this Audit Committee.

F. RISK MANAGEMENT

The proposed action does not increase any risks to the force. The governance arrangements recommended should ensure effective progress and decision making.

G. PUBLIC ACCESS TO INFORMATION

Information in this report along with any supporting material is subject to the Freedom of Information Act 2000 and other legislation.

ANNEX 1.

Ref	Area for Improvement by Audit	Priority	Action to be taken	Planned completion date	Manager Responsible	Progress to Date (05/03/2013)
1	<p>To avoid confusion, the business areas listed in Annexes B, C & E of the BCM Strategic Plan should be revised to ensure they are consistent.</p> <p>It should also identify those departments under the management of G4S.</p>	Low	<p>Amend and update appendices in BCM Strategic Plans to ensure these are accurate and consistent.</p> <p>EPO to make initial amendments as plans are drafted and plan writers to ensure ongoing maintenance.</p>	30/06/2012	Ian Watkins	<p>BCM Strategic Plan reviewed and appendices amended.</p> <p>This includes amendments to clarify business areas where BCM responsibilities now sit with G4S</p> <p>Complete & Remains Valid.</p>
2	<p>An action plan of key elements required to complete the current business continuity planning process should be drawn up, with deadlines identified.</p> <p>This should be subject to review by the Business Continuity Management Board and issued by the ACC (PS) to the department representatives responsible for completing the work.</p>	Medium	<p>Formal action plan to be produced with appropriate timescales.</p>	31/07/2012	Ian Watkins	<p>BCM Board agreed action plan will be based in part upon final recommendations and the timescales indicated in this response.</p> <p>A specific, timed Action Plan with tasks and timings is set out in this Annex.</p> <p>Complete & Remains Valid.</p>

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3	<p>Those departments which have not yet completed the Business Impact Analysis should be identified to the Assistant Chief Constable (Protective Services) to place a formal request that these be completed by a defined date.</p> <p>Those assessments completed should be subject to a thorough independent review and where the information is unclear or missing the department should be challenged.</p>	Medium	<p>Departments / business units to go through a Business Impact Analysis process with a focus on force critical activities. These are to be completed during production of BCM Plans. Subsequent schedule for periodic review of BIA to be included in BCM Plans.</p> <p>A Quality Assurance type review will then take place conducted by Force EPO and BCM Board.</p>	30/09/2012	ACC Bannister	<p>21/09/12 – All Force Departments have completed a BIA process. This has been reviewed by the Force Emergency Planning Officer. Where further work is required, feedback has been given and a requirement made for further information.</p> <p>BIA is an ongoing process to be repeated periodically and following major change.</p> <p>Complete & Remains Valid</p>

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4	<p>The current process of preparing a BCM plan for each department is wasteful of resources. The focus is on individual departments preparing their own plan, initialling in isolation, which involved considerable duplication of effort, especially in the preparation of part of the plans which could be addressed on a generic basis (e.g. location for the initial meeting following an incident, alternative locations depending on the number of staff to be relocated).</p> <p>A more efficient approach is to create a single BCM for the Force, with sections for each department. The premise being that the basic of the plan will be the same for whatever the incident, but the information relevant to each business area will be included thus all relevant information will be available to all staff with a copy of the plan.</p>	High	<p>Proposed plan Force BCM structure and content to be reviewed and plan templates to be developed which reduce unnecessary repetition or duplication of documents.</p> <p>Force BCM Coordinator to issue advice on plan structure and work with plan writers to ensure plan consistence and interoperability.</p>	31/05/2012	ACC Bannister	<p>Review of planning methodology and force plan structures has been undertaken. Guidance and revised plan templates provided to plan authors.</p> <p>Plans are now being produced in line with templates and guidance issued by the Force Emergency Planning Officer. This means that a single methodology and plan structure is being used to help ensure consistency and increase efficiency.</p> <p>Perhaps the single most important point is that ALL departmental plans relate to a common set of ACPO critical functions and Force Critical Activities.</p> <p>Proposal to produce plans in a single document format have been peer reviewed (by Eric Mirfin, Sth Yorks Police (a recognised national lead)). Practice of maintaining separate Departmental / Business Unit plans should be maintained but use template format and central support as above.</p> <p>Complete & Remains Valid</p>

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5	A key team should be identified which includes a central team for any disaster plus key officers from each department to be included as required.	Medium	The force plan already exists to do this. Details specified in Force BC Incident Management Plan	30/05/2012	Ian Watkins	This team is already identified (by role) in the Force BC Incident Management Plan combined with the Force BCM Strategic Plan and BCM Policy. Complete & Remains Valid.
6	A full list of all the key officers identified within the BCM Strategic Plan should be maintained up-to-date.	Low	List to be updated and maintained.	30/06/2012	Ian Watkins	The list of persons with BCM Responsibility has been updated in the current version of this plan. Maintenance is an ongoing activity Complete & Remains Valid

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7	Training for these key individuals should then be arranged as necessary.	Low	Appropriate training to be identified and arrangements made for delivery.	31/07/2012	Ian Watkins	<p>A costed proposal for training provision has been produced and submitted to ACC Bannister.</p> <p>Current decision is that no funding is available for such training so this issue can be progressed no further at present.</p> <p>Key individuals involved in BCM are actively increasing knowledge and awareness through self study and peer support, which whilst not perfect, is a sensible and so far effective compromise to costly training inputs.</p> <p>Situation remains the same.</p> <p>No further change anticipated. Completed.</p>

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8	<p>All the key officers identified within the BCM Plan(s) should have a paper copy of the full BCM Plan(s). These staff should be instructed to have the plan easily accessible should an incident occur, ideally kept with them at all times.</p> <p>Alternative solutions could be individuals having two copies, one kept in their office and one at home/in the boot of their car, etc.)</p> <p>It is also prudent to keep a copy of the plan at the designated location(s) for the initial meeting following an incident.</p>	Medium	<p>Plan templates and planning guidance to include requirement to retain copies in accessible formats and locations which ensure plans are available 24/7.</p> <p>Arrangements to allow storage of plans on Force intranet, within FCR Secure Files and in Department Heads Office as a minimum to be in place.</p>	30/11/2012	Ian Watkins	<p>Plan templates indicate minimum is that copies to be lodged in FCR secure files, Intranet, EPO Office and BC Leads Office.</p> <p>Arrangements are in place to enable copy plans to be accessible via Intranet, FCR Secure Files and EPO Office as well as other locally held copies. Such storage is highly secure, yet readily accessible 24/7/365.</p> <p>Compliance with guidance will be monitored and reported on by EPO.</p> <p>Current plans that have been finalised have all been published on Intranet and copies circulated in accordance with each plans requirements.</p> <p>Complete & Remains Valid.</p>

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9	<p>On an annual basis, a BCM test should be completed based on a hypothetical scenario.</p> <p>This exercise should be undertaken using the plans as a guide and any weaknesses identified should be recorded and the action required identified.</p> <p>Following the exercise a formal report of lessons learned should be prepared for presentation to the BCM Board.</p>	High	<p>Requirement to exercise plans to be included in guidance and facilitated by plan templates.</p> <p>Specific requirements for training and exercise and reporting of exercise results to be included within the Force BCM Plans as these are produced.</p> <p>Force EPO to monitor and report on progress to the BCM Board.</p>	<p>31/10/2012 (Requirement in Plans)</p> <p>31/09/2013 (For exercise to have been delivered)</p>	<p>Ian Watkins</p> <p>ACC Bannister</p>	<p>Guidance regarding the exercising and reporting requirement have been issued. Plan templates require the exercising program for plans to be specified.</p> <p>Compliance with the guidance will be monitored by the Force EPO as plans are submitted for review.</p> <p>The Force EPO and BCM Board will monitor completion of exercises and future progression of work to deal with identified areas for improvement.</p> <p>March 2013 exercise completed and formal report of lessons learned to be presented at BCM Board March 2013. Completed.</p>

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12	A formal process should be devised to ensure that updates to the BCM plan are communicated to all staff who hold a copy of the plan, and that these staff provide a formal acknowledgement that they have made the necessary amendments to the plan(s) they hold.	Medium	Requirement to be included in Force Strategic BCM plan. Department / Business Unit Heads to ensure current version of plan held by relevant staff (as per distribution lists on their plan). BCM Coordinator (EPO) will be responsible for maintaining register of current plans, coordinating provision of access to up to date centrally held versions and confirm validity with plan authors.	30/09/2012	Ian Watkins	<p>The requirement to provide the Force EPO with a copy of current plans is included in Force BCM Strategic Plan and in issued guidance.</p> <p>Amendment made to Force BCM Strategic Plan detailing the formal process that ensure updates are communicated to staff etc.</p> <p>Force EPO as BCM Coordinator will manage plan version control and ensure current versions are available to all and circulated where required and receipt confirmed.</p> <p>Completed & remains valid.</p>

