

Agenda item:	8
Report title:	Business Continuity Working Group update
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Action:	To note

Executive summary

The Business Continuity Working Group oversees the development, maintenance and improvement of the GMC's business continuity management system.

We follow the good practice guidelines published by the Business Continuity Institute and align to the national ISO 22301:2012 standard.

This paper summarises the work undertaken by the BCWG since the last report to the Performance and Resources Board on 23 June 2016 and key activities planned to deliver the 2017-2018 work programme.

Recommendations

The Executive Board is asked to note:

- a** The work of the Business Continuity Working Group (BCWG).
- b** The updated Business Continuity Working Group Terms of Reference (Annex A).

Background

- 1 The Business Continuity Working Group (BCWG) is chaired by the Director of Resources and Quality Assurance and reports to the Executive Board annually. Business continuity ensures that the GMC can respond effectively in the event of a disruption to normal operations.
- 2 Operationally, the work of the BCWG is led by Melanie Quinlan who joined the GMC in September 2016 as Business Continuity and Compliance Manager, to manage both business continuity and health and safety.

Overview of the BCWG

- 3 The BCWG meet bi-monthly to review and discuss:
 - Any business continuity incidents or events that caused a business interruption.
 - The business continuity annual work plan and training matrix.
 - New procedures and plans.
 - Any potential new risks.

Business Continuity work since June 2016

- 4 All of the over-arching organisational Business Continuity plans have been reviewed and updated, to include changes resulting from the change programme along with some minor changes to the format and the addition of aide memoires.

List of plans:

- Organisational Business Continuity plan.
 - Emergency Response plan 3HS.
 - Emergency Response plan MPTS.
 - Emergency Response plan London.
 - Pandemic Response plan.
- 5 All plans are now available on staff desktops and on GMC Samsung mobile phones, through the Content app. In addition to this, a piece of work is being carried out with IS to ensure that the plans are available on SMT's iPhones.

- 6 The business continuity risk register has been reviewed and updated. All risks that are no longer relevant have been removed and the previous risk register archived. No new risks have been identified.
- 7 A programme of business continuity training has been delivered by Mel Quinlan for staff members who will be involved in the initial response to an incident and department business continuity champions, including:
 - Incident Management (four sessions).
 - Incident Controller (two sessions).
 - Log Keeper (three sessions)
 - Business Continuity workshop phase 1 (six sessions).
 - Business Continuity workshop phase 2 (five sessions)
- 8 A scenario based organisational exercise facilitated by external consultants Glen Abbot, has been scheduled in June to provide colleagues in the senior management and incident management teams with the opportunity to experience responding to an incident in real time.
- 9 In order to ensure a life-like scenario, each area of the business has been contacted to discuss what level of disruption the scenario may have on their service delivery. This information will be provided to the exercise attendees so that they have an awareness of the impact across the organisation.
- 10 A significant amount of work has been carried out to develop the Business Continuity plans at department level, and to increase awareness of business continuity throughout the organisation.

Departmental recovery plans

- 11 Each service area of the organisation now has an appointed Business Continuity Champion to ensure that departmental recovery plans are in place, reviewed and kept up to date. To ensure that each Champion is recognised and valued for the work that they complete, we have worked with HR and the L&D team to include a business continuity objective in their personal objectives.
- 12 In February 2017 all Business Continuity Champions attended a business continuity workshop, which provided support for carrying out Business Impact Assessments (BIA), including:
 - An introduction to business continuity.

- A discussion around the GMC's time sensitive activities.
 - An introduction to the new BIA template.
 - The offer of a 1-2-1 session to assist with completing the BIA template.
- 13** Since February we have reviewed 48 Business Impact Analysis forms. Each "time sensitive activity" and "internal dependency" has been taken from each form and added to an organisational spreadsheet. This information is currently being analysed to ensure that each department sets realistic and achievable recovery times.
- 14** The Business Impact Analysis form also asks each business area, which software application they depend on for each activity. This information has been collated to include in the IS Disaster Recovery plan.
- 15** In May the Business Continuity Champions attended a second business continuity workshop, which provided them with:
- An overview of business continuity strategies and tactics.
 - A mini exercise to look at organisational challenges.
 - An introduction to the new Departmental Business Continuity (DBC) plan template.
 - The offer of a 1-2-1 session to assist with completing the Departmental Business Continuity plan.
- 16** We are currently in the process of reviewing all 49 Departmental Business Continuity plans.

Business Continuity e-learning package

- 17** A new mandatory Business Continuity E-learning course has been produced to raise business continuity awareness across the organisation. The course will be live in June, with staff being given a 3 week deadline for completion.

Business Continuity Incident Response

Cyber Security Incident 12 May 2017

- 18** On the 12 May 2017 there was a global ransomware attack. The media advised that several NHS trusts, as well as another 45,000 companies across 99 countries were targeted.
- 19** The IS Cyber Security plan was activated; however there was no evidence that the GMC had been affected. The Cyber Technical Response Team worked late into the evening and throughout the weekend, to ensure that our systems were secure.

During this time regular updates were sent to members of the Incident Management Team and the Senior Management Team.

- 20 The Cyber team established themselves quickly, and soon identified the need to switch off the link to the NHS system. Following on from this they isolated all GMC email systems and servers to prevent an attack.
- 21 A crucial role throughout the response was the gathering of intelligence, in order to safeguard our systems. In order to do this, the IS team worked with security partners to assess the particular nature of the threat.
- 22 The level of patching on GMC laptops meant that if an individual laptop had been affected, our systems would have prevented the virus spreading across our network.
- 23 Once the incident was stood down Adam Walker (Infrastructure Manager) and Melanie Quinlan (Business Continuity & Compliance Manager) conducted an internal debrief of the incident.

Manchester Bomb 22 May 2017

- 24 On Monday the 22 May at 22.30hrs, the Manchester Arena was attacked by a suicide bomber. The media advised that 22 people died and another 59 were injured.
- 25 The following morning transport links to the city centre were severely disrupted. The Incident Management Team quickly gathered information and identified the potential implications to colleagues travelling into Manchester.
- 26 At approximately 07.15hrs on Tuesday morning, HR sent an all staff text message and email to colleagues, encouraging them to work from home or delay their journey into work. The message also provided colleagues with the contact details of our Employee Assistance programme.
- 27 The Staff Incident Line was also updated with new information.
- 28 Staff working in the Contact Centre, Clinical Assessment Centre, on MPTS hearings, receptions and the switchboard came into the office to ensure that operationally there was no disruption to services.
- 29 Throughout the course of the day the incident was monitored. At 10.30hrs the Incident Management Team convened, followed by the Senior Management Team at 11.00hrs, to review the situation as it developed. At 16.00hrs there was a final Incident Management Team meeting.

Business Continuity Standard

- 30** A business continuity gap analysis was conducted in September 2015, which aligned our procedures to the IS22301 standard. Since this date we have enhanced our procedure, which has brought us closer to the standard.
- 31** Our Business Continuity Consultants Glen Abbot advised that the ISO 22301 is currently under review. In addition to this they have worked with organisations who have implemented the ISO standard; however they found the process too prescriptive, as well as not meeting the needs of individual organisations. We will continue to align to the standard and review this position in 12 months' time.

Next Steps

- 32** Business Continuity has a continuous lifecycle, which ensures the improvement of resilience procedures. In order to keep the momentum and continue to enhance procedures we will:
- Provide an internal debrief report following the Organisational Business Continuity exercise.
 - Complete Loggist training with the Admin Network group.
 - Conduct the annual review of organisational plans.
 - Add the Departmental Business Continuity information to the Pandemic Response plan.
 - Plan and conduct a Business Continuity awareness week.
 - Validate the 48 Departmental Business Continuity plans by conducting a mini table top exercise.
 - Conduct annual reviews of the Organisational Business Continuity plans.

Document review

- 33** Updated documents are submitted to the group for review and the BCWG has approved the Terms of Reference document at Annex A following the annual review of the document.

8 – Business Continuity Working Group update

8 – Annex A

BCWG Terms of Reference

**Business Continuity Working Group:
Terms of Reference**

Author	Melanie Quinlan
Version	5.0
Issue Date	17th May 2016
Review Date	One year
File Location	Document:
	Pdf: Intranet

Introduction

- 1 The purpose of this document is to formalise the roles and responsibilities of the Business Continuity Working Group (BCWG).

Background

- 1 The BCWG provides direction and support in order to develop and maintain the Business Continuity Management System (BCMS). The work of this group enables the GMC to be assured that appropriate actions are taken in the event of any unplanned business interruption and that potential threats are reviewed.
- 2 Our Business Continuity Policy sets out the framework to develop and sustain our business continuity plans and procedures, which we align to the ISO22301:2012 standard. In order to achieve this we continually look for ways to improve our processes and raise awareness across the business.
- 3 The business continuity plans include pre-identified procedures along with aide memoires to assist the incident response teams. The annual review of the plans ensures that they are fit for purpose with the most current information. In addition to the incident response plans, each service also has an individual Departmental Recovery plan.
- 4 Our Document Management system supports the systematic approach to the management of the business continuity, as it identifies the various review dates for each of our plans and procedures.

Scope

- 5 This document details the terms of reference for the BCWG, and its role in developing and managing the BCMS.

Responsibilities

- 6 The Director of Resources and Quality Assurance (R&QA) is the chair for the BCWG meetings and ensures that the group operates in accordance with the Terms of Reference. In addition to this the Director will also lead on all business continuity matters.
- 7 The BCWG is accountable to the Executive Board and the R&QA Director will refer matters if necessary. The Executive Board comprises of the Chief Executive, Chief Operating Officer and all Directors.

- 8** The Business Continuity and Compliance Manager is responsible for business continuity and will ensure that:
- The annual work plan is on target.
 - All plans and documents are maintained and reviewed on time.
 - Training sessions are designed and disseminated.
 - Business continuity awareness is raised across the organisation.
 - All incidents and exercises are reviewed.
 - Procedural changes are updated as and when necessary.

Membership

- 9** The BCWG includes representatives from all business areas; however the primary group consists of those responsible for any identified time sensitive activities.

BCWG member list:

- Director of Resources and Quality Assurance (Chair)
- Business Continuity and Compliance Manager
- Assistant Director of Information Systems
- Head of Facilities
- Assistant Director of Human Resources
- Head of IS Operations
- Assistant Director of Registration and Revalidation
- Assistant Director of Strategy and Communications
- Assistant Director of Fitness to Practise
- Assistant Director of Education and Standards
- Assistant Director of MPTS
- Health, Safety and Compliance Officer

Where the member is unable to attend a nominated deputy will attend on their behalf.

Meetings

- 10 The group will meet bi-monthly and the Business Continuity Manager will ensure that all necessary paperwork is circulated.

Responsibilities of the BCWG

- 11 The Business Continuity Working Group supports the business continuity management framework which aligns to the ISO 22301:2012 standard.
- 12 The key responsibilities of the group include the following points which align to both the standard and the Good Practice Guidelines (published by the BCI).

Plan

- Develop business continuity policies, strategies, plans and procedures.
- Develop a reporting schedule for the management of reviews and audits.

Do

- Ensure that business continuity policies, strategies plans and procedures are implemented.
- Support the Business Continuity Manager in coordinating the implementation of business continuity.
- Ensure that all staff are aware of the BCM Policy.
- Horizon Scan so that any emerging risks, issues or changes to legislation, regulation and interested party management can be incorporated into the necessary parts of the BCMS.
- Ensure that all necessary roles for the development, maintenance and review of the BCMS are allocated and training is provided.
- Identify all critical suppliers and ensure their Business Continuity arrangements are reviewed.
- Implement a safe and secure documentation storage medium for the BCMS.

Check

- Approve business continuity policies, strategies, plans and procedures.
- Review status reports covering business continuity implementation, exercising, training, post-incident reports, risk management and corrective actions.
- Using the Management Review check that the BCMS remains effective and report the finding to top management.

Act

- Implement corrective actions arising from implementation, risk management, post-exercise reviews, post-incident reviews, management reviews and internal audit.
- Recommend changes to policies, strategies, plans and procedures based on business continuity incidents and changes in risks.
- Promote and manage continual improvement of the BCMS process.

Document Control

Version History

Version	Status*	Author	Reason for issue	Date
4.0	Agreed by BCWG and by SMT on circulation	Sheila Tuffrey	Creation	3 June 2011
4.1	Published	Sheila Tuffrey	Changes in organisation and maturity of BC	April/May 2013
4.2	Published	Sheila Tuffrey	Changes requested by BCWG/AD R&QA	15 May 2013
4.21	Reviewed in 2014 and 2015 - no changes made	Sheila Tuffrey	Reviewed by BCWG by circulation no changes	29 May 2014
4.3	Draft – updated to new template. Note added about deputies and management	Sheila Tuffrey	Circulated to BCWG	April/May 2016

	review			
4.3	Final	Sheila Tuffrey	Approved at meeting	24 May 2016
5.0	Draft	Melanie Quinlan	Review	May 2017

Maintenance and Review

Date of Review	Action Required	Responsible person
Year from approval	Review content for consistency and currency	Melanie Quinlan

Sign off

Reviewed by	Method	How approved
BCWG	By circulation	Feedback by email and at meeting

Distribution

All members of the Business Continuity Working Group (BCWG)