

Action	To note
Purpose	This paper summarises the work undertaken by the Business Continuity Working Group (BCWG) and Compliance Team, since the last report to the Executive Board in June 2019. The paper also identifies key activities we plan to deliver in the 2020/21 work programme.
Decision trail	The Executive Board receives an update from the BCWL each year.
Recommendations	<ul style="list-style-type: none"> a To note the work of the Business Continuity Working Group b To note the BCWG Terms of Reference.
Annexes	Annex A: BCWG Terms of Reference
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Background

- 1** Business continuity ensures that the GMC can respond effectively in the event of a disruption to normal operations.
- 2** The Business Continuity Working Group (BCWG) oversees the development, incident response training, maintenance and improvement of the GMC's business continuity management system. The group is chaired by the Director of Resources and reports annually to SMT.
- 3** Operationally, the work of the BCWG is led by Business Continuity and Compliance Manager, Melanie Quinlan.
- 4** We follow the good practice guidelines published by the Business Continuity Institute and align to the national ISO 22301:2012 standard.

Overview of the BCWG

- 5** The Compliance Team provide information and updates to the BCWG who meet bi-monthly.
- 6** In order to drive business continuity forward, the Compliance Team request that the BCWG:
 - Discuss any potential new risks.
 - Review any business continuity incidents or events that have caused a business interruption.
 - Discuss the business continuity annual work plan and training matrix.
 - Participate in two incident response training sessions each year.
 - Discuss new procedures and plans.

Business Continuity update since June 2019.

- 7** Each business area continues to have an appointed Business Continuity Champion, who ensures that their operational recovery plan is in place, reviewed and kept up to date.
- 8** This year we have completed five more operational business continuity exercises, which validate each Operational Business Continuity plan. This brings the total number of validated plans to 39, with six remaining.

- 9** All organisational plans were reviewed and published in October 2019.
- 10** In July 2019 we reviewed our business continuity training and exercising. Incident Controllers were invited to become members of the BCWG, and BCWG members will now receive incident management training twice a year, as part of the pre-scheduled BCWG meetings. This has increased the number of Incident Managers (previously incident controllers) able to lead in the event of an incident.
- 11** We designed and delivered training on managing a reputational incident held for managers of the Comms Team and IMT. Unfortunately, due to Covid-19 the scheduled training for SMT has been postponed.
- 12** A Business Continuity and IS BC Steering Group (BCISSG) has been established to oversee the cross over between IS operations and business continuity planning.
- 13** A full review of our technical Disaster Recovery plan will be ongoing throughout 2020, using the data sets captured by the Compliance Team. IS are using this data to identify all the systems that will need to be recovered in specific time frames, using two worst case scenarios.
 - a** A ransomware attack on our systems
 - b** A fire in our data centre.
- 14** The Compliance team and IS have created a BC questionnaire document that will be completed for all IS projects. The questionnaire will identify if the project has an impact on any of our time sensitive activities, as well as ensuring that contingency plans are built into the early design phase.
- 15** A successful test of our IS equipment held at the Daisy Recovery site, was conducted in November 2019.

Covid-19 Business Continuity Incident Response

- 16** On 28 January 2020 the Incident Management Team was activated in preparedness for COVID-19. The Pandemic Response plan was also activated in the preparedness phase, along with the Operational Plans for all business areas.
- 17** SMT met the following Monday on 3 February 2020.

Compliance team response

18 Early in January we were made aware of the new virus in Wuhan. In order to gather as much information as possible we contacted our external BC Consultant and monitored the news and all official information sites.

19 As soon as the virus started to spread across Europe, we activated IMT as well as:

- Continued to identify all new information from WHO and PHE.
- Maintained regular contact with our external BC Consultant, discussing possible worst-case scenarios and identifying how other organisations were preparing for Covid-19.
- Liaised with IS to establish network capacity and to identify contingency plans for possible worst-case scenarios. Once complete we collaborated across the organisation, sharing the information and identifying further contingency plans.
- Prepared and distributed all situation reports.
- Designed and held workshops with all 45 Business Continuity Champions within the first two weeks of IMT being established.
- Requested that all business areas plan for various worst-case scenarios, hold regular meetings with senior managers and horizon scan for potential operational problems.
- Liaised with all business areas to identify the minimum number of staff who would require system access, if our bandwidth could not sustain all GMC users. The first group we looked at was P1 activities, followed by P2 and then P3.
- Through the IMT we managed to move everyone in the organisation to home working.
- Worked with our external BC consultant to provide an internal debrief for IMT.
- Liaised with all business areas to identify and capture lessons learnt.

Next steps

20 Business Continuity has a continuous lifecycle, which ensures the improvement of resilience procedures. In order to keep the momentum, we will:

- Work with auditors BDO to produce a report on our lessons learnt.
- Continue to work with IS to complete the disaster recovery plan review.
- Enhance the loss of IS systems section in each Operational Business Continuity plan.
- Work with Procurement to look at our supply chain in more detail.
- Enhance the supplier section in each Operational BC plan.
- Provide further training and exercise sessions with all business areas, to help identify further areas for improvement.
- Plan to conduct an invacuation drill for all staff at all our sites when re-occupied
- Continue to raise awareness across the organisation on all guidance documents.

Document review

21 The terms of reference document was reviewed and approved by the BCWG on 17 July 2020 (Annex A).

Business Continuity Working Group: Terms of Reference

Author	Mel Quinlan
Version	6.2
Issue Date	7 th July 2020
Review Date	One year
File Location	Document: Livelink
	Pdf: Intranet

Introduction

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

Background

- 2** The BCWG provides direction and support in order to develop and maintain the business continuity management system. 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.
- 3** 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.
- 4** 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.
- 5** 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

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

Responsibilities

- 7** The Director of Resources 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.
- 8** The BCWG is accountable to the Executive Board and the Resources Director will refer matters if necessary. The Executive Board comprises of the Chief Executive, all Directors and representative Assistant Directors.
- 9** The Business Continuity & 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

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

11 BCWQ member list:

- Chair: Director of Resources: Chairperson
- Business Continuity & Compliance Manager
- Health Safety and Compliance Manager
- AD Information Systems
- Head of Facilities
- AD Human Resources
- Head of IS Operations
- AD Registration
- AD Strategy and Communications
- AD Fitness to Practise
- AD Audit and Risk Assurance
- AD Medical Licensing Assessment

- Finance Manager
- AD MAP's
- Head of Business Transformation
- AD Education and Standards
- AD MPTS
- Compliance Officer

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

Meetings

13 The group will meet bi-monthly and the BC Manager will ensure that all necessary paperwork is circulated.

Responsibilities of the BCWG

14 The Business Continuity Working Group supports the business continuity management framework which aligns to the ISO 22301:2012 standard.

15 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 BC Manager in coordinating the implementation of business continuity.
- Partake in two incident management training sessions each year.

- 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 BC 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 review	Sheila Tuffrey	Circulated to BCWG	April/May 2016
4.3	Final	Sheila Tuffrey	Approved at meeting	24 May 2016
5.0	Final	Melanie Quinlan	Review	May 2017
6.0	Final	Melanie Quinlan	Review	May 2018
6.1	Final – approved at May 2019 BCWG meeting	Warren Dale	Annual review. Directorate name change (R&QA updated to Resources)	22 May 2019
6.2	Final – approved by email 17 th July	Mel Quinlan	Annual Review with minor changes	17 th July 2020

Maintenance and Review

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

Sign off

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

Distribution

16 All members of the Business Continuity Working Group (BCWG).