WEST YORKSHIRE FIRE & RESCUE SERVICE

Business Continuity Management Strategy

Date Issued: 12 November 2012
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PREVENTING PROTECTING RESPONDING
## Version Control

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1.0 Introduction

This strategy and relating policy provides the framework within which West Yorkshire Fire and Rescue Service (WYFRS) can implement and manage a business continuity management system to ensure that key services can be maintained in the event of any disruption. The business continuity management system (BCMS) also demonstrates and provides assurances to the Authority’s stakeholders including the public that arrangements are in place to maintain the core functions of:

- Fire Safety
- Fire Fighting
- Road Traffic Accidents
- Emergencies

Business Continuity Management (BCM) can be defined as:

“The holistic management process that identifies potential threats to an organisation and the impacts to business operations that those threats, if realised, might cause, and which provides a framework for building organisational resilience with the capability for an effective response that safeguards the interests of its key stakeholders, reputation, brand and value creating activities.” (BS25999 Standard)

2.0 Business Continuity Framework

There is a direct relationship between business continuity management, risk management, crisis management and emergency planning. WYFRS arrangements in these four areas ensure an integrated approach to risk and resilience.

Business continuity management activities have an ultimate impact upon the management of risks and may reduce, or remove corporately identified risks.

WYFRS business continuity policy, plans, procedures and arrangements embrace and are aligned to the requirements of the British Standard BS25999 – Business Continuity Management (replaced by ISO 22301:2012).

The standard applies the “Plan-Do-Check-Act” (PDCA) cycle (see Appendix 1). This cycle is summarised in the business continuity management life cycle which WYFRS has adopted from the standard.
WYFRS as a fire and rescue service also has a requirement to comply with several Acts and legislation in terms of business continuity arrangements, as detailed in the Business Continuity Planning Guide, which include:

- Fire and Rescue Services Act 2004
- The Fire and Rescue Services (Emergencies) (England) Order 2007
- Civil Contingencies Act 2004
- National Framework
## Business Continuity Document Structure

![Diagram of Business Continuity Document Structure]

### Generic BCP’s
- Staff Shortage
- Widespread Flooding
- Flu Pandemics

### Directorate
- **Service Delivery**
  - Response
  - Control
  - Operational Support
  - Fire Safety Protection
  - Fire Safety Prevention
- **Strategic Development**
  - Strategic Development
- **Service Support**
  - Employee Resources
  - Human Resources
  - Corporate Diversity
  - Training & Development
  - Occupational Health & Safety
- **Corporate Resources**
  - Information and Communications
  - Corporate Services
  - Transport and Logistics
  - Property
  - Committee Services
- **Finance**
  - Finance and Central Ordering

### Departmental BCP’s
- **Generic Business Continuity Plans**
- **Departmental Business Continuity Plans**
- **Business Continuity Group**
- **Business Continuity Strategy and Policy**
- **Business Continuity Plan Owner and Team**

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*Note: The diagram and table illustrate the structure and components of a business continuity plan.*
3.0 Business Continuity Management System - Planning

3.1 Requirements

WYFRS will develop, implement, maintain and continually improve a documented business continuity management system to meet the needs of the Authority, its stakeholders and the public by ensuring it can deliver key services within the four key areas of:

- Fire Safety
- Fire fighting
- Road Traffic Accidents
- Emergencies

WYFRS delivers these key services through its strategies as detailed within the Authority’s Service Plan.

Robust business continuity arrangements which are implemented and effective will contribute to the Authority achieving the objectives stated within the annual Action Plans which contribute to the achievement of the Authority’s Service Plan priorities.

The Business Continuity Group’s main purpose is to continually improve WYFRS business continuity arrangements in line with this policy.

Overall accountability with regard to business continuity within WYFRS rests with the Chief Fire Officer/Chief Executive. Overall responsibility for this policy and implementation of business continuity arrangements rests with the Director of Corporate Resources.

3.2 Policy

The scope of this policy applies to all areas of WYFRS service delivery arrangements across all functions and activities. There are a number of requirements for business continuity including WYFRS being a statutory Local Authority with corporate status, the Fire and Rescue Services Act 2004, Civil Contingencies Act 2004, corporate governance and good managerial practice. It is also considered best practice for any organisation to have arrangements in place to ensure the continuance of service delivery in the event that service interruptions occur.

Policy Statement

The Authority is committed to implementing and maintaining robust business continuity arrangements which will enable critical functions to continue to delivery key services in the event of minor/major incidents, disruptive events and crisis situations.

The Management Board will:

- Ensure business continuity arrangements meet the requirements of any statutory, regulatory and contractual duties placed upon the Authority.
- Develop, implement, maintain and continually improve business continuity strategies, plans and arrangements.
- Ensure all functions/activities have effective strategies and plans to manage disruptive events and maintain service delivery.
- Ensure business continuity arrangements reflect the level of risk accepted by WYFRS.
- Create strategies and plans for new risks if appropriate which have been identified as a result of the risk management process and have adequate arrangements in place for existing risks which could affect service delivery.
- Provide assurances to all stakeholders through the implementation and maintenance of relating strategies and plans.
- Apply this policy to all functions and activities within WYFRS.
• Provide adequate resources, training and competent staff required to establish, implement, operate and maintain the business continuity management system.
• Review the Authority’s business continuity arrangements on an annual basis in line with the Service Plan - Annual Action Plans.
• Evaluate WYFRS response to disruptive events and identify areas for further development.
• Ensure WYFRS adopts best practice and new developments where improvements to arrangements can be achieved.

3.3 Roles, Responsibilities and Resource Provision

Business Continuity Group

WYFRS has an established Business Continuity Group which reports directly to the Deputy Chief Fire Officer and the Risk Management Strategy Group. The main purpose of the group is to:

• Provide strategic direction for the effective management of business continuity across the Authority.
• Provide the relevant assurances to stakeholders on the Authority’s business continuity arrangements.
• Provide the strategic direction for responding to disruptive events, emergencies and service interruption as a result of unplanned external or internal incidents.
• Determine annual priorities for action.

Risk Management Officer

The Risk Management Officer is responsible for business continuity management, risk management and crisis management arrangements within WYFRS.

Specific business continuity responsibilities include:

• Develop and administer WYFRS business continuity programme.
• Provide advice and develop arrangements to ensure compliance with legislation.
• Develop and implement the Business Continuity Strategy.
• Review and develop WYFRS business continuity arrangements to support the Authority’s Service Plan and annual Action Plans.
• Develop, maintain and disseminate a portfolio of resources – policy, standard, performance indicators and toolkit.
• Facilitate and guide directorates, departments and stations in the development and implementation of supporting action plans.
• Establish and maintain business continuity plans including contingencies for business continuity ensuring conformity to statutory and regulatory duties.
• Identify and advise the resources required to establish, implement, operate and maintain the business continuity management system.
• Ensuring appropriate training is undertaken to raise awareness of business continuity planning and to ensure business continuity plans can be created, implemented and maintained.
• Monitor and report on the performance of business continuity arrangements.
• Co-ordinate and facilitate the Business Continuity Group.
• Communicate business continuity arrangements and developments across WYFRS.
• Advise the Crisis Management Team on business continuity plans and arrangements.
Business Continuity Plan Owners

Business continuity plan owners are responsible for the creation, implementation, maintenance and testing of plans for the departments/functions within their area of responsibility. Owners must ensure that they have identified critical functions and the resources required to maintain and recover them in the event of a disruption as a result of an incident or event.

Business Continuity Teams

Business continuity teams are responsible for assisting plan owners to develop and maintain their departments/functions business continuity plans. In the event of a disruption team members will fulfil specific roles as identified in their plans. Team members may also be called upon to assist other departments/functions in the event of a disruption.

All Managers

Managers are likely to be plan owners and are responsible for ensuring all staff within their department/function are aware of the plan content and the role they play in the event that the plan is invoked. Managers must ensure that staff responsible for maintaining elements of their plan, documents, information/data do so to ensure plans are up to date and reflect current arrangements and requirements.

All Staff

All staff must ensure they are aware of their role as identified within their departments/functions plan. In the event of a disruption staff must follow the instructions of line managers as the type and scale of an event may dictate that standard policies and procedures cannot be adhered to.

3.4 Personnel Competency and Training

The provision of business continuity management training is an organisational necessity and is a key component of business continuity promotion and development of a positive culture. It is essential that all staff understand the concept of business continuity management and how they contribute to the delivery of key services and critical functions not only in a “business as usual” environment but also when a disruptive event occurs. Therefore all staff will be made aware of business continuity management and arrangements through information/guidance and advice provided on the Business Continuity section of WYFirespace.

WYFRS will ensure that all staff that have assigned business continuity roles and responsibilities are trained and competent to perform tasks allocated to them. The Risk Management Officer and WYFRS Training and Development department will determine the necessary competencies for staff with business continuity roles and responsibilities and conduct training needs analysis. The training needs analysis will be linked to the Personal Development Review (PDR) and planning process. The PDR will also provide the mechanism to evaluate individual performance and the effectiveness of the business continuity training provision.

Training will be provided where the training needs analysis has identified the need and the level of training provided will be relevant to the role. Training requirements may also be highlighted following business continuity exercises and the testing of plans and some exercises in themselves will provide a degree of training and awareness and highlight levels of competency. Training requirements will also be reviewed following any business continuity incident or crisis event. Managers will also be responsible for identifying staff training requirements and will liaise with the Risk Management Officer when additional training may be required. Training may be as simplistic as an overview of strategy/policies/plans with detailed training provided for the creation of business continuity plans. The method of training delivery will be tailored to the audience and the subject material/content to be delivered. Where significant changes to policy, plans or arrangements have occurred, training or briefing sessions will be provided.
Training will be coordinated and managed by the Training and Development department and may be facilitated either by in-house or external training and development programmes. It is important to ensure that the necessary competence has been achieved by the training provided. Records of training including skills, experience and qualifications will be managed and maintained by the Training and Development department.

Job descriptions will include business continuity management as a requirement where applicable.

Training will also be offered to Fire Authority members in respect of business continuity management.

The Civil Contingencies Act 2004 requires Category 1 responders (WYFRS) to put in place a training programme for those directly involved in the execution of business continuity plans.

Training will enable business continuity arrangements to be embedded into the culture of the Authority.

3.5 Embedding Arrangements and Culture

Awareness of WYFRS business continuity arrangements is raised, enhanced and maintained through:

- Internal communication via WYFirespace, Business Continuity (including policy).
- Business Continuity Group meetings.
- Annual Business Continuity Exercises.
- The creation, implementation and maintenance of department business continuity plans.
- Exercising and testing of business continuity plans.
- Training relevant to roles and responsibilities (Operational development plans and frameworks).
- Regional business continuity forums.

All staff will receive awareness training to highlight the importance of meeting business continuity management objectives and how they contribute, conforming to business continuity policy and the need for continual improvement.

The above arrangements will enable WYFRS to embed business continuity principles into organisational culture and will demonstrate senior management commitment.

The process for evaluating the effectiveness of awareness delivery is part of the exercising and testing process.

3.6 Documentation and Records

WYFRS business continuity arrangements include the following documentation:

- The Business Continuity Strategy (including policy scope and objectives).
- Resource provision.
- Business impact analysis.
- Risk assessment.
- Business continuity resources strategy.
- Incident response structure.
- Business continuity plans (including incident management plans).
- Exercise/testing plans and reports.
- Internal audits.
- Reviews and maintenance of the management system, arrangements and plans.
- Business continuity management system management review.
- Training and competency records.
- Business Continuity Group meetings and actions.
- Preventative/corrective actions and continual improvement records.
All business continuity related documents and records will adhere to WYFRS document management policies and will be controlled by the Risk Management Officer. Documents will be approved by the Risk Management Officer, the Management Team/Board and the Audit Committee/Authority where applicable. Documents will be reviewed on a periodic basis and made available at the point of use either in hard copy or electronic format. WYFRS will use WYFirespace to publish documents (restricted and non-restricted).

4.0 Business Continuity Management System - Implementation and Operation

WYFRS will identify the critical functions, activities and resources required to support service delivery, understand the threats to WYFRS and choose appropriate risk treatments through the business impact analysis and risk assessment processes.

4.1 Business Impact Analysis

Business Impact Analysis (BIA) is the process by which WYFRS assesses both quantitative and qualitative impacts on service delivery activities that may result from a disruptive event. The BIA process will identify the impact upon critical functions and activities within departments which support service delivery. The Business Continuity Plan and Management document contains the BIA process. The findings of the BIA are used to inform business continuity management decisions and solutions.

For suppliers on whom critical functions depend, WYFRS will determine what BCM arrangements are in place for the relevant products/services they provide.

4.2 Risk Assessment

Risks assessments will be conducted using the risk management process contained within the Risk Management Policy. Risk assessments to understand the threats to and vulnerabilities of critical functions and supporting resources, including those provided by suppliers and outsourced partners will be detailed within the Business Continuity Plan and Management document.

4.3 Risk Treatment

The treatment of risks will be conducted using the risk management process contained within the Risk Management Policy.

4.4 Business Continuity Resource Strategies

WYFRS has generic business continuity resource strategies for staff, premises, technology, communications, information/data/documents, vehicles, equipment and suppliers/supplies (see Business Continuity Planning Guide).

Specific strategies will be included within the Business Continuity Plan and Management document for each department/function. This document will include the incident response structure and plan and the resources and activities including suppliers for continuity, recovery and resumption.

4.5 Incident Response

The Business Continuity Plan and Management document contains the incident response structure and arrangements within the business continuity plan section.
4.6 Business Continuity Plans and Incident Management Plans

WYFRS has a number of generic business continuity plans to manage disruptive events which have the potential to impact on all departments/functions simultaneously e.g. Staff Shortages, Industrial Action and Pandemics. Generic plans will be created by working/sub-groups in conjunction with the Risk Management Officer and other relevant Managers.

Departments/functions which have identified critical functions within their respective areas will have department business continuity plans. Departmental/function plans will be created by the Manager.

The Risk Management Officer will ensure:

- The business continuity planning process is adhered to.
- Plans are approved, maintained, reviewed and issued.
- Plans are complete and contain the required information (audit).
- Available at the point of use.
- Plans are communicated to the relevant staff/departments.
- Plans are exercised/tested.

Business continuity plans will state who has the authority to invoke the plan and the method of invoking the plan. However, all staff, departments and function groups have a responsibility to identify circumstances which could result in disruptive events and when an actual event has occurred, which impacts on critical functions and ultimately service delivery. As generic business continuity plans affect multiple departments/functions the authority to invoke them will be the responsibility of the Chief Fire Officer, First Call Principal Officer or Management Board representative.

Each business continuity plan will have identified staff/teams, however, depending on the type and scale of the event it may be necessary to form Response and Recovery Teams (see Crisis Management arrangements).

4.7 Exercising and Testing

To ensure business continuity arrangements are effective and robust when required and meet business requirements, WYFRS will ensure that all business continuity management arrangements are validated by exercising and testing. Arrangements will be subject to periodic review. Exercising will also be used to evaluate the suitability of WYFRS arrangements and resilience to service interruption.

WYFRS will:

- Develop exercises that are consistent with the scope of the business continuity management system and reflect the environment in which WYFRS operate.
- Have an annual business continuity exercise programme approved by the Management Team.
- Validate all business continuity arrangements through the most appropriate type of exercises.
- Ensure all exercises are planned to minimise any risks occurring as a result of an exercise.
- Ensure that all exercises have a documented plan and report which states the aims and objectives, the post-exercise review, achievement of objectives, outcomes and feedback and any required actions to improve business continuity arrangements, either within the area being tested or elsewhere within WYFRS.
- Exercise/test when significant changes occur.

Reports and relating recommendations/actions as a result of exercising and testing will be reviewed and coordinated by the Risk Management Officer/Business Continuity Group.

Exercising and testing provides greater assurance that during and following a disruptive event, critical functions will be maintained and recovered as required.
The exercising and testing of business continuity plans may be conducted by one or a combination of the following:

- **Desk Top (DT)** – Desk top exercises are performed as the name suggests at a desk and involves reviewing the complete plan and any relating documents. Any amendments to the plan should be completed immediately and communicated.

- **Walk Through (WT)** – Involves a full review of the plan, however, where the plan states that actions should be taken or resources are available, these should be checked (e.g. if the plan states there are four PC’s in the fallback location, then the person conducting the test must go to the fallback location and check the PC’s are actually there, working and have the necessary access, software, documents or data available for use).

- **Live Test (LT)** – This tests the full plan as if it was a real event, either by creating a test scenario or invoking all elements of the plan in a structured format.

- **Annual Exercise (AE)** – WYFRS conduct annual business continuity exercises which involve testing a number of plans at the same time. The plans tested will depend on the scenario and the test history of individual plans. If a real event occurs within the specific time period, then this may replace the need for performing the annual exercise, providing that the event results in a significant test of arrangements.

- **No Notice Test (NNT)** - A no notice test will be conducted with no prior warning and will be triggered either by the Chief Fire Officer or Deputy Chief Fire Officer.

**4.8 Maintenance and Review**

WYFRS recognises the requirement to maintain business continuity arrangements which continually meet the needs of the organisation. The Business Continuity Management Strategy and Business Continuity Planning Guide will be reviewed on a periodic basis by the Risk Management Officer. The Business Continuity Plan and Management documents (business impact analysis, risk assessment, business continuity plan, resources requirements and exercise programme) will also be subject to periodic review (self-assessment) and ongoing maintenance by the plan owners. Reviews will focus on the continuing suitability, adequacy and effectiveness of arrangements.

Ongoing review of business continuity arrangements will be conducted by the Business Continuity Group. Reviews may also be undertaken by way of internal audits on arrangements or specific plans.

Business continuity arrangements and plans will also be reviewed following any disruptive event, major corporate re-structure and any planned exercises/tests.

If a business continuity plan is invoked due to a disruptive event a post incident review will be undertaken to:

- Establish the nature and cause of the disruptive event.
- Assess the adequacy of WYFRS or the department’s response to the event.
- Assess WYFRS or the department’s effectiveness in meeting the recovery time objectives.
- Assess WYFRS business continuity arrangements in relation to preparing staff for disruptive events (including the incident, business continuity and recovery and resumption activities).
- Enable improvement areas to be identified and associated recommendations/actions to be implemented.
5.0 Business Continuity Management System - Monitoring and Review

5.1 Internal Audit

WYFRS will ensure that internal audits of the business continuity management system are conducted at planned intervals according to the annual audit plan.

Internal audits will determine if:

- The actual business continuity management system in place conforms to planned arrangements stated within this document and relating business continuity plans.
- The arrangements in place conform to the requirements of BS 25999.
- Arrangements have been fully implemented and maintained ongoing.
- Arrangements are effective in meeting WYFRS business continuity objectives, which are reported to Management Team in the form of audit reports.

The annual audit plan will take into account the complete business continuity management system of WYFRS, which includes strategy, policy, planning guides and plans (generic and departmental). The audit plan will also take into account the results of previous audits.

Audits will be undertaken by competent staff that will be responsible for planning and conducting audits, reporting audit results and maintaining the necessary audit documentation and records. To ensure objectivity and impartiality of the audit process, auditors will be selected accordingly. The Risk Management Officer and Business Continuity Group will review audit criteria, scope, frequency and methods to be used.

Audits will also take account of the following legislative requirements and expectations:


Audit results will form part of the management review of the business continuity management system.

Peer reviews conducted by other fire and rescue services and audit/reviews by independent external organisations and professionals may also be conducted if required.

5.2 Management Review

WYFRS management will review the business continuity management system on a periodic basis and when significant changes occur either to staff structures or working practices/arrangements.

Reviews will focus on identifying areas for improvement either directly or indirectly related to WYFRS business continuity arrangements including strategy, policy and objectives. Reviews will be documented and reported to the Risk Management Strategy Group, Management Board and Audit Committee.

Business continuity management is also a standard agenda item of the Risk Management Strategy Group, which meets quarterly and consists of senior managers, along with Kirklees Audit Manager and Kirklees Risk and Insurance Manager.
The annual review of the business continuity management system will include the following as inputs to the review:

- Results of internal audits and reviews.
- Results of audits of key suppliers/partners where applicable.
- Reviews of business continuity arrangements including generic and departmental plans by the Business Continuity Group.
- Feedback and recommendations from key stakeholders.
- Resources which could be used to improve WYFRS arrangements in terms of performance and effectiveness.
- Status of preventative and corrective actions.
- The level of residual and acceptable risk associated with identified critical functions.
- Outcomes of previous risk assessments.
- Outstanding actions from previous reviews.
- Current or future internal or external changes which could affect WYFRS business continuity management system.
- Results and recommendations for improvement from exercises and tests.
- Developments in best practice and guidance in the area of business continuity management.
- Recommendations as a result of actual disruptive events and incidents.
- Results and feedback from training sessions, awareness and guidance material.

The review process may result in decisions and actions being taken to:

- Vary the scope of WYFRS business continuity management system.
- Improve the effectiveness of the system.
- Amend the strategy, policy, planning guides and plans (generic and departmental) as necessary to respond to the internal or external environment that could impact on the system (service delivery requirements and processes, resilience requirements, statutory/regulatory and contractual requirements and risk levels/acceptance).
- Resource requirements.
- Funding and budget requirements.

Decisions and actions will be submitted and approved by the relevant individual, team, board or committee.

This review will enable performance to be monitored and will indicate how effective the Authority’s business continuity management system is.

**6.0 Business Continuity Management System - Maintenance and Improvement**

WYFRS will improve the business continuity management system through the application of preventative and corrective actions, which shall be proportionate to the issue/problem identified and aligned with the policy and objectives. Documentation will be amended to reflect preventative and corrective actions which have been taken or implemented if applicable.

**6.1 Preventative Actions**

Preventative actions will be taken by WYFRS to prevent potential non-conformities from occurring. WYFRS will identify potential non-conformities and their causes and establish and implement the necessary preventative action. All action taken will be documented, reviewed periodically and communicated to those who may need to know.

Preventative action also relates to actions taken to mitigate existing risks which have changed and new risks. Actions will be prioritised based on risk assessment and the business impact analysis process.
6.2 Corrective Actions

Corrective actions will be taken by WYFRS to eliminate the cause and prevent recurrence of non-conformities associated with the implementation and operation of the business continuity management system.

Non-conformities will be identified, causes established and the need for action evaluated to prevent recurrence. Corrective action can then be determined and implemented accordingly with the results of action taken recorded and reviewed at the appropriate time after implementation.

6.3 Continual Improvement

The arrangements detailed within this policy document will be reviewed on a periodic basis to enable WYFRS to continually improve the effectiveness of the business continuity management system.
Appendix 1 – Plan-Do-Check-Act” (PDCA) cycle applied to the Business Continuity Management System process

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<th>Plan</th>
<th>Establish business continuity policy, objectives, targets, controls, processes and procedures relevant to managing risk and improving business continuity to deliver results in accordance with an organization’s overall policies and objectives.</th>
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<tr>
<td>Do</td>
<td>Implement and operate the business continuity policy, controls, processes and procedures.</td>
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<tr>
<td>Check</td>
<td>Monitor and review performance against business continuity objectives and policy, report the results to management for review, and determine and authorize actions for remediation and improvement.</td>
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<tr>
<td>Act</td>
<td>Maintain and improve the BCMS by taking preventive and corrective actions, based on the results of management review and re-appraising the scope of the BCMS and business continuity policy and objectives.</td>
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