Business Continuity Management Strategy and Policy

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1 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 those threats, if realised, might cause, and which provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value creating activities.’ (ISO 22301:2012)

2 Business Continuity Framework

WYFRS business continuity framework, consisting of the strategy, policy and all supporting procedures and resources, ensures that the business continuity processes can operate effectively and efficiently.


Business Continuity Document Structure
3 Business Continuity and Risk Management

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.

4 Context of WYFRS

4.1 Organisational Context

There are external and internal areas/issues that are relevant to WYFRS, which can affect the ability to achieve intended outcomes.

These include:

- WYFRS activities, functions and services
- Key resources (e.g. employees, equipment, premises, information)
- Partnerships
- Supply chains
- Relationships with interested parties (stakeholders)
- Potential impacts of disruptive internal and external incidents/events

The above issues and areas are identified in terms of the potential impacts from disruptive internal and external events. They are documented in generic and department Business Continuity Plans (BCPs), where relevant.

The business continuity management strategy and policy supports and enables WYFRS risk management strategy, and assists WYFRS achieve its priorities and key objectives.

WYFRS risk assessment is ultimately determined by the organisations risk capacity, risk exposure and risk tolerance. Risk assessment at a strategic/corporate level is determined by a number of factors including the Fire and Rescue Authority, Management Board, available resources, funding and the changing political and operational environment in which WYFRS operates.

Risks at strategic/corporate level are generally related to political, economic, social, technological, legal and environment issues, whereas risks at an operational level relate to key resources that enable objectives to be achieved (e.g. staff, premises, information/data, and supplies/suppliers).

The main purpose of WYFRS business continuity management system is to maintain critical functions that enable key service delivery areas to be maintained at normal operating levels, in order to achieve agreed or expected objectives/targets.

4.2 Stakeholders and Legal Requirements

The business continuity framework has been established to ensure WYFRS can continue to deliver services whilst considering various stakeholders during and following disruptive events. Stakeholders can be any person or organisation that can affect, be affected by or perceive themselves to be affected by a decision or activity.
WYFRS stakeholders include the public (individuals, commercial organisations, communities), emergency services, insurance companies/loss adjusters, solicitors, elected members, unions, partner organisations, suppliers and the media. The importance of these stakeholders may differ when operating during a disruptive event, as opposed to when operating during 'business as usual' conditions.

Increased communication may be required by some stakeholders prior to, during and following disruptive events, and stakeholders expectations will need to be managed. Some disruptive events may also require a formal communication strategy/plan.

WYFRS as a fire and rescue service also has a requirement to comply with several Acts and legislation in terms of business continuity arrangements, which include:

- Fire and Rescue Services Act 2004
- The Fire and Rescue Services (Emergencies) (England) Order 2007
- Civil Contingencies Act 2004
- National Framework
- The common law civil and criminal obligations and requirements

4.3 Scope

The scope of this strategy, policy and business continuity management system 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.

4.4 Business Continuity Management System

The business continuity management system (the framework) consists of all elements of this strategy, policy and associated procedures and processes.

5 Leadership

5.1 Leadership and Commitment

The development and maintenance of this strategy and policy is within the remit of the Chief Legal and Governance Officer and the approval of the Audit Committee as necessary.

All managers are responsible for implementing, maintaining and developing this strategy/policy and associated business continuity arrangements within their area of responsibility.
5.2 Management Commitment

5.3 Policy

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.

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 and 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.

Management Board will ensure the above responsibilities are achieved via the activities of the Risk Management Strategy Group, the Business Continuity Group and management actions.

5.4 Roles, Responsibilities and Authority

Business Continuity Group

WYFRS has an established Business Continuity Group which is supervised by the DCFO and feeds into the Risk Management Strategy Group deliberations.

The main purpose of the group is to ensure the Business Continuity Strategy is implemented within WYFRS, which includes the policy, framework, procedures and relating arrangements, and once implemented, to maintain, review and continually develop the business continuity management system. This will ensure all areas of WYFRS can respond effectively to disruptive events.

Key tasks and membership of the group are stated in the relating terms of reference.
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 departments, districts 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.
- Ensure appropriate training is undertaken to raise awareness of business continuity planning and to ensure business continuity plans can be created, implemented and maintained.
- 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 – Responsible Manager

Business continuity plan managers are responsible for the creation, implementation, maintenance and testing of plans for the departments/functions within their area of responsibility. Managers 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 managers 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 responsible for a plan and are therefore 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.
6 Planning

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.

Overall accountability with regard to business continuity within WYFRS rests with the Chief Fire Officer/Chief Executive. Overall responsibility for developing and maintaining this policy and implementation of business continuity arrangements rests with the Chief Legal and Governance Officer.

6.1 Risk and Opportunities

Corporate risks and related opportunities are managed by the Risk Management Strategy Group, risk owners and the application of relating policy/procedures.

Risks specific to individual departments/functions are managed within the related business continuity plans (risk assessment-critical functions).

6.2 Business Continuity Objectives

Business continuity objectives are stated within the policy and within generic business continuity plans and department business continuity plans.

7 Support

7.1 Resources

The Risk Management Officer in conjunction with the Business Continuity Group is responsible for identifying and advising on the resources required to establish, implement, operate and maintain the business continuity management system. Management Board are responsible for providing the resources necessary to maintain and further develop the system.

7.2 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 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 Business Continuity Group in conjunction with the Training and Development department (training and development framework) will determine the necessary competencies for staff with business continuity roles and responsibilities.

Training will be provided where a 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/briefing/awareness will be provided.

Training will be coordinated by the Risk Management Officer 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.

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

Staff inductions will also include elements of business continuity awareness (Corporate Services and department inductions)

Training will also be offered to Fire and Rescue 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.

7.3 Awareness

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
- Regional business continuity forums
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.

7.4 Communication

Communication will be via standard communication channels during normal operating conditions (business as usual).

Communication during disruptive events and the process involved is stated within individual business continuity plans.

Communication both internal and external (see stakeholder section) may be implemented by Management Board/Crisis Management Team prior to, during and following disruptive events. For significant disruptive events a communication plan may be required. This includes receiving communication from stakeholders relating to national and regional threats to the organisation and its activities. (The Crisis Management Team consists of members of Management Board. Core membership of the team is supported by members of the management team depending on the type and scale of the crisis. Additional staff with specialist skills/knowledge will be brought into the team or consulted).

Communication may also be required with emergency/partner organisations via the West Yorkshire Resilience Forum.

7.5 Documentation

WYFRS business continuity arrangements include the following documentation:

- The Business Continuity Management Strategy and Policy
- Resource provision
- Business impact analysis
- Risk assessment
- Business continuity resources strategy
- Incident response structures
- 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 annual reviews
- 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).

For contingency purposes specific business continuity documents, department BCPs and generic BCPs will also have copies stored outside of WYFirespace. This includes mobile computing devices and hard copies.

WYFRS ICT system also allows remote access to specific parts of the network.

8 Operations

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.

A corporate list of all identified critical functions in priority order will be maintained and reviewed on an annual basis, or when additional critical functions have been identified.

8.1 Planning and Control

The Risk Management Officer in conjunction with the Business Continuity Group will plan and control the process required to implement this strategy and policy.

8.2 Business Impact Analysis and Risk Assessment

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 (department BCP) 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 arrangements are in place for the relevant products/services they provide.

Risks assessments will be conducted using the risk management process contained within the Risk Management Strategy and 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 BCPs.

8.3 Business Continuity Strategy

Generic business continuity plans contain strategies for key resources where applicable (e.g. staff shortages). Specific strategies will be included within the BCP 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.
Contingency arrangements for sourcing alternative resources in the event of a business continuity event are maintained for key resources.

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 the Risk Management Officer with input from managers as required.

Departments/districts/functions which have identified critical functions within their respective areas will have department or district business continuity plans. These plans will be created by the relevant manager.

The Risk Management Officer will ensure:

- The business continuity planning process is adhered to
- Plans are created, approved, maintained, reviewed and issued
- Plans are complete and contain the required information (audit)
- Plans are 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 relate to 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).

**8.4 Procedures**

Business continuity procedures are included within generic/department/district plans. Generic plans are based on four stages of an event lifecycle (plan, pre-event, live and post event). Department plans are based on the incident management stage, the business continuity stage and the recovery and resumption stage.

The process for warning and communicating both internally and externally is stated in the relevant plans. Significant disruptive events may require a specific communication plan, relevant to all stakeholders.

All functions identified as ‘critical’ will have an associated business continuity plan, owned by the relevant department.

Operational response may also have ‘response plans’ for dealing with disruptive events in an operational context e.g. wide area flooding.
8.5 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
- 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/tests have a record which states the objectives, scope, resources, risks, results/outcomes (achievement of objectives), post test actions and further testing required to improve business continuity arrangements, either within the area being tested or elsewhere within WYFRS
- Exercise/test when significant changes occur

The annual test/exercise programme will be developed and approved by the Business Continuity Group and will be based on prioritised critical functions and key resources.

Reports and related 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 related 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 PCs in the fallback location, then the person conducting the test must go to the fallback location and check the PCs 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.

9 **Performance Evaluation**

WYFRS recognises the requirement to maintain business continuity arrangements which continually meet the needs of the organisation. The Business Continuity Management Strategy and Policy will be reviewed on a periodic basis by the Risk Management Officer. The BCPs will also be subject to periodic review (self-assessment) and ongoing maintenance by the plan manager. Reviews will focus on the continuing suitability, adequacy and effectiveness of arrangements.

The annual BCP review process by BCP managers should include physical verification that fallback locations and contingency resource requirements remain current.

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.

9.1 **Monitoring, Measurement, Analysis and Evaluation**

9.2 **Internal Audit**

WYFRS will ensure that internal audits of the business continuity management system are conducted at planned intervals according to an 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 ISO 22301
- Arrangements have been fully implemented and are maintained
- Arrangements are effective in meeting WYFRS business continuity objectives, which are reported in the form of audit reports
The 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:

- The Fire and Rescue Services Act 2004
- The Fire and Rescue Services (Emergencies) (England) Order 2007
- The Civil Contingencies Act 2004

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

WYFRS internal audits are primarily conducted by Kirklees Internal Audit Team.

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

9.3 Management Review

WYFRS 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 and Management Board.

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:

- The status of actions from previous management reviews
- Changes in external and internal areas relevant to the system
- Information on business continuity performance (non-conformities, corrective actions, evaluation results, audit results and self-assessments)
- Opportunities for continual improvement
- The need for changes to policy, objectives and the system
- Techniques, products or procedures which could be introduced to improve the systems performance and effectiveness
- Status of preventative and corrective actions
- Results of exercising and testing
- Risks and risk assessments not adequately assessed
- Any internal or external changes which could affect the scope
• Adequacy of the policy
• Recommendations for improvement (internal audits, reviews, self-assessments)
• Lessons learned from disruptive events (internal and external)
• Emerging good practice and guidelines
• 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 stakeholders
• Current or future internal or external changes which could affect WYFRS business continuity management system
• Results and feedback from training sessions, awareness and guidance material

The outputs of the management review may result in decisions and actions being taken to:

• Vary the scope of WYFRS business continuity management system
• Improve the effectiveness of the system
• Update of risk assessments, BIA, BCPs and related procedures
• Modify the strategy, policy, planning guides and plans (generic and departmental), procedures and controls, as necessary to respond to the internal or external environment and events that could impact on the system (business and operational requirements and processes, risk reduction/security/resilience requirements, statutory/regulatory and contractual requirements and risk levels/acceptance)
• Resource requirements
• Funding and budget requirements
• How the effectiveness of controls are measured

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.

10 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.

10.1 Nonconformity and Corrective Action

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.
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.

10.2 Continual Improvement

The arrangements detailed within this 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
Continual improvement of business continuity management system (BCMS)

Establish
(Plan)

Maintain and improve
(Act)

Implement and operate
(Do)

Monitor and review
(Check)

Interested parties

Requirements for business continuity

Managed business continuity

Figure 1 — PDCA model applied to BCMS processes

| Plan (Establish) | Establish business continuity policy, objectives, targets, controls, processes and procedures relevant to improving business continuity in order to deliver results that align with the organization’s overall policies and objectives. |
| Do (Implement and operate) | Implement and operate the business continuity policy, controls, processes and procedures. |
| Check (Monitor and review) | Monitor and review performance against business continuity policy and objectives, report the results to management for review, and determine and authorize actions for remediation and improvement. |
| Act (Maintain and improve) | Maintain and improve the BCMS by taking corrective action, based on the results of management review and reappraising the scope of the BCMS and business continuity policy and objectives. |

Source: BS ISO 22301: 2012