

BUSINESS CONTINUITY MANAGEMENT POLICY

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6.0	23.3.2022	Rachel Pickford	Final	Policy approved by the Governing Body to rollover until 30 June 2022 or CCG closedown, whichever is first, unless there is change in policy or good practice or if anything is identified through an internal audit.

Circulation List

Prior to approval, this Policy was circulated to the following for consultation:

- Operational Governance Group (version 3.0)
- CCG Service Level Leads (version 3.0)
- MLCSU IG Support Team (version 3.0)
- Audit Committee

Following Approval this Policy Document will be circulated to:

- All CCG staff

Equality Impact Assessment

This document has been impact assessed by the author. No issues have been identified in relation to Equality, Diversity and Inclusion.

Contents

1.0	Introduction	4
2.0	Purpose	4
3.0	Definitions	4
4.0	Roles and Responsibilities	5
5.0	Business Continuity Management Planning	6
6.0	Initiating the Business Continuity Management Plan	6
7.0	Training.....	7
8.0	Monitoring and Review.....	7
9.0	Associated Documents	8
	Appendix 1: Team Business Continuity Template.....	9
	Appendix 2: Business Continuity Scenarios.....	12
	Appendix 3: Fuel Shortage Operational Response Plan.....	14

1.0 Introduction

- 1.1 Under the Civil Contingencies Act (2004), Clinical Commissioning Groups have a duty to put in place Business Continuity Management arrangements.
- 1.2 Local experiences over recent years which have required organisations to invoke their Business Continuity Management Policy and supporting plans have included flood, fire, disruptions to electrical supply, communication failures and the fuel crisis. Other potential occurrences that also need to be considered when preparing operational Business Continuity Management Plans include the risk of Flu Pandemic and severe weather.
- 1.3 Significant events likely to cause serious interruption of the continuity of the Clinical Commissioning Group's business warrant the activation of the NHS England Local Area Team (LAT) Incident Response Plan.
- 1.4 Minor business interruptions occur on a daily basis and are dealt with using regular and familiar systems and resources, such as general repair and maintenance contracts or routine management intervention.
- 1.5 Business continuity will be managed via individual service level plans which are refreshed on an annual basis and are completed using the template in Appendix 1. These plans are specific to the business continuity needs of specific teams. However if the incident involved a disruption to fuel, an organisational plan has been developed to address this on a consistent basis, and can be found in Appendix 3 to this policy.

2.0 Purpose

- 2.1 The creation and maintenance of the Clinical Commissioning Group's Business Continuity Management Policy and supporting plan ensures that there is a clear, workable plan for prompt action in the face of events that have the potential to compromise the normal expectations of services and delivery of objectives.
- 2.2 The Business Continuity Management Policy and supporting plan will complement the Incident Response Plan but extends beyond it. It addresses potentially serious disruptions in the services provided by the Clinical Commissioning Group that may not necessarily be of sufficiently high risk to trigger the Incident Response Plan.
- 2.3 It coordinates a planned response to an event whose impact could not be handled within routine service arrangements and would require the implementation of special planning procedures by the Clinical Commissioning Group alone to respond to it.

3.0 Definitions

- 3.1 The following definitions apply to terms used in this policy, in accordance with BS2599-1:2006:
 - **Activity:** Processes or sets of processes undertaken by the CCG, or on behalf of the CCG, that supports delivery of services.
 - **Business As Usual:** Pre-defined acceptable levels of service delivery.

- **Business Continuity Management (BCM):** Process to identify potential threats; assess the impact of those threats on the CCG, and building a framework to support CCG resilience to those threats, including protecting patients and stakeholders interests and achieving strategic objectives. Includes strategic and tactical capability of the CCG to plan for and respond to business interruptions in order to support continued delivery of 'business as usual'.
- **Critical Activities:** Those activities carried out by the CCG which are most time sensitive and important for ensured continued delivery. These will be mainly those services essential for immediate life and death of patients. These activities will typically suffer if delayed by more than one hour.
- **Disruption:** Any event, planned or unplanned, which causes an interruption to the CCG's ability to continue business as usual.
- **Essential Activities:** Those activities carried out by the CCG which are sensitive and important, but not critical to life and death of patients. These activities will normally suffer if delayed by more than one day.
- **Major Incident:** An event classified as a major incident according to the CCG Major Incident Response Plan.
- **Non-Urgent Activities:** Those activities carried out by the CCG which can be postponed or delayed most easily. These activities will begin to suffer if delayed by more than one month.
- **Routine Activities:** Those activities carried out by the CCG which support business delivery on a daily basis and are not critical or essential. These activities will typically start to suffer if delayed by more than one week.
- **Service Recovery:** The process through which business as usual is reached, following an interruption or disruption event.

4.0 Roles and Responsibilities

4.1 The following general (statutory) duties apply:

- The Civil Contingencies Act (2004) places a duty on CCGs to have business continuity plans in place to ensure that they can continue to exercise their functions in the event of an emergency so far as is reasonably practicable. The duty relates to all functions, not just their emergency response functions;
- Healthcare Standards require the organisation to be able to continue essential routine work during an incident or emergency situation and to provide essential supplies, with documented procedures for procuring additional or alternative supplies;
- British Standard 2599-1:2006 gives guidance for establishing a Business Continuity Plan and Process within an organisation and this policy is written accordingly.

4.2 The following specific duties and responsibilities apply within the CCG:

- **Chief Officer:** The Chief Officer has overall statutory responsibility for the ensuring that the Clinical Commissioning Group has Business Continuity Management (BCM) arrangements in place, in line with the requirements as outlined in the Civil Contingencies Act for Category Two Responders.
- **Governing Body:** The CCG Governing Body is responsible for setting the strategic context in which business continuity and service recovery procedures are developed, and for the formal review and approval of this Policy. The Governing Body is also responsible for determining the accepted levels of 'business as usual', through monitoring service delivery and approving suggested

developments. Through the commissioning and contract monitoring processes, the Governing Body is responsible for gaining assurance that providers commissioned by the CCG have adequate BCM systems and processes in place to ensure service continuity.

- **Head of Strategy and Corporate Services:** The Head of Strategy and Corporate Services oversees the CCG's Business Continuity planning arrangements and ensures that plans to support the core business functions are completed and updated as necessary.
- **Senior Management Team:** The Senior Management Team are responsible for ensuring their departmental BCM plan is reviewed on a quarterly basis and updated as necessary, notifying plan revisions to the Corporate Affairs and Governance Manager, supporting business continuity awareness, ensuring all staff are aware of their responsibilities and participating in business continuity training or exercises.
- **All Staff:** All CCG staff are responsible for co-operating with the implementation of the Policy as part of their normal duties and responsibilities.

5.0 Business Continuity Management Planning

5.1 In developing its Business Continuity Plan, the CCG will:

- draft team business continuity plans using the templates at Appendix 1 to this policy;
- develop arrangements that include contingency plans and task list for the recovery process to assure the Governing Body of its resilience in the face of potential interruptions;
- develop, maintain, communicate and operate its own service level procedures to mitigate the impact of any incident affecting the normal delivery of their services;
- ensure that it has identified and agreed any support and services required from other parties – this information must be easily accessible and distributed to all personnel who have a specific part to play in a recovery.

5.2 A serious or major business continuity disruption would be reported via the CCG's established on-call procedures and managed through organisational frameworks.

6.0 Initiating the Business Continuity Management Plan

6.1 The Business Continuity Management Plan will be initiated when any disruption to service delivery is experienced. This may include, but is not limited to the following potentially disruptive events, which may not be mutually exclusive:

- **Business continuity/internal incidents** – fire, breakdown of utilities, significant equipment failure, hospital acquired infections, violent crime
- **Big bang** – a serious transport accident, explosion, or series of smaller incidents
- **Rising tide** – a developing infectious disease epidemic, or a capacity/staffing crisis or industrial action
- **Cloud on the horizon** – a serious threat such as a significant chemical or nuclear release developing elsewhere and needing preparatory action
- **Headline news** – public or media alarm about an impending situation, reputation management issues

- **Chemical, biological, radiological, nuclear and explosives (CBRNE)** – CBRNE terrorism is the actual or threatened dispersal of CBRN material (either on their own or in combination with each other or with explosives), with deliberate criminal, malicious or murderous intent
- **Hazardous materials (HAZMAT)** – accidental incident involving hazardous materials
- **Cyber attacks** – attacks on systems to cause disruption and reputational and financial damage. Attacks may be on infrastructure or data confidentiality
- **IT System Downtime** – temporary loss of information held on IT systems including Covalent and ModGov which are used to support 'Business As Usual' activities
- **Mass casualty** – typically events with casualties in the 100s where the normal major incident response must be augmented with extraordinary measures

6.2 The CCG's responsibility and required action in the event of such disruption is expanded at Appendix 2.

6.2 Activation of the Business Continuity Management Plan in full or part will be determined through discussion between the senior manager in the work area concerned and the Chief Officer, Chief Finance and Contracting Officer or Head of Strategy and Corporate Services.

6.3 Decisions to activate the Business Continuity Management Plan out of hours will be made by the on-call manager.

6.4 Once the plan is activated, the incident will be managed by the senior manager in the work area and the on-call manager.

6.5 The senior manager managing the incident will be responsible for

- ensuring that accurate records are kept of all decisions and actions taken, and that these records are stored in accordance with the records management policy; and
- liaising with the head of communications to ensure that appropriate statement for internal and external communication are prepared

7.0 Training

7.1 All Governing Body members need to be aware of the Business Continuity Management Policy.

7.2 Training will be provided to all senior managers, including those on the on-call rota on the population, review and activation of the Business Continuity Management Plan.

7.3 Emergency Preparedness, Resilience, and Response training will also be delivered as outlined in the Incident Response Policy and Plan.

8.0 Monitoring and Review

8.1 The policy will be reviewed and refreshed, where appropriate, on three yearly basis.

- 8.2 Where changes in legislation, guidance or organisation structure occur, the policy will be reviewed immediately, with the amended policy being submitted to the relevant committee for approval.
- 8.3 The business continuity plans developed to support the policy will be reviewed twice yearly to ensure that are up- to-date.

9.0 Associated Documents

- 9.1 This plan is separate, but complementary to the CCG's :
- Emergency Planning, Resilience and Response Policy
 - Incident Response Policy and Plan
 - Risk Management Strategy
 - On-Call Managers Pack
 - Team contacts lists stored in the restricted access on-call section of the Intranet
 - Information Governance (IG) Staff Handbook
 - Standard Operating Procedure for ModGov (Business Continuity section)
 - Covalent Fall Back Plan

Appendix 1 – Service Level Business Continuity Plan Template

Section 1: Team Details

Team	
Completed By	
Telephone	
E-mail	
Date	
Due for review	

Section 2: Business Impact Assessment

Each key function is impact assessed to determine the Maximum Tolerable Period of Disruption and prioritised to identify the most critical services which cannot be scaled back so business continuity arrangements can be prepared.

	IMPACT ASSESSMENT (1=negligible, 2=Minor, 3=Moderate, 4=Major, 5=Catastrophic)					
All Key Functions	0 – 24 hours	24 – 48 hours	48 hours – 1 week	1 week plus	MTPD (Max tolerable period of disruption)	Priority: Red ¹ Amber ² Green ³

Section 3: Resources for Critical (Red) Services

People

What is the optimum number of staff you require to carry out the service?
What is the minimum number of staff you require to deliver some level of service?
What skills / level of expertise are required?

¹ Red activities are those that must be continued

² Amber activities are those that which could be scaled down if necessary

³ Green activities are those which could be suspended if necessary

ALL PRIORITY RED SERVICES ARE BUSINESS CRITICAL

Premises

What locations does the service currently operate from?
What alternative premises are available?
Could the service be delivered from home?

Technology

What IT is essential to carry out your service? (consider hardware and software)
What communication equipment is essential to carry out your service (phones, email etc)

Information

What information is essential to carry out your critical activities?
How is the information stored?
How will any data be backed-up during the time of business continuity?

Partners

Who are the partners which the service depends on for delivery?
Do you tender key services out to another organisation, to whom and for what?
Do you have any reciprocal arrangements with other organisations?

Section 4: Service Level Business Continuity Risk Register Template (for Corporate Covalent Office use following the collation of service level plans)

Code	Risk Description	Risk Owner	Origl Risk Imps	Origin Risk Likelh	Original Risk Risk Score	Existing Controls	Existing Controls	I	L	Current Risk	Linked Actions Code & Title	Linked Actions Due Date
Risk Code	Risk Title	Ownership Managed By	Origl Risk Imps	Origin Risk Likelh	Original Risk Risk Score	Existing Controls	Existing Controls	Cl	Cu	Current Risk Score	Linked Actions Code & Title	Linked Actions Due Date
											Linked Actions Code & Title	Linked Actions Due Date
Risk Code	Risk Title	Ownership Managed By	Origl Risk Imps	Origin Risk Likelh	Original Risk Risk Score	Existing Controls	Existing Controls	Cl	Cu	Current Risk Score	Linked Actions Code & Title	Linked Actions Due Date
											Linked Actions Code & Title	Linked Actions Due Date
Risk Code	Risk Title	Ownership Managed By	Origl Risk Imps	Origin Risk Likelh	Original Risk Risk Score	Existing Controls	Existing Controls	Cl	Cu	Current Risk Score	Linked Actions Code & Title	Linked Actions Due Date
											Linked Actions Code & Title	Linked Actions Due Date
Risk Code	Risk Title	Ownership Managed By	Origl Risk Imps	Origin Risk Likelh	Original Risk Risk Score	Existing Controls	Existing Controls	Cl	Cu	Current Risk Score	Linked Actions Code & Title	Linked Actions Due Date
											Linked Actions Code & Title	Linked Actions Due Date
Risk Code	Risk Title	Ownership Managed By	Origl Risk Imps	Origin Risk Likelh	Original Risk Risk Score	Existing Controls	Existing Controls	Cl	Cu	Current Risk Score	Linked Actions Code & Title	Linked Actions Due Date
											Linked Actions Code & Title	Linked Actions Due Date

When using this plan, please also refer to the following documents:

- **Team contacts lists stored on the on-call section of the intranet**
- **Incident Response Policy and Plan stored on the staff section of the intranet**
- **Business Continuity Management Policy stored on the staff section of the intranet**
- **Emergency Preparedness, Resilience, and Response Framework stored on the staff section of the intranet**

Appendix 2: Business Continuity Scenarios

The table below details potential scenarios and the organisations accountable in each instance. In addition, where these require CCG input further detail is provided.

Business Continuity Issues	Organisation Effected	Organisational Responsibility	Action Required by CCG	Notifications
Major accident or incident, national disaster, epidemic, terrorist attack	The CCG	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	Commissioned Provider	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	GP Practice	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG
	Lancashire Wide/Multiple Organisations	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG
Fire, Flood, extreme weather conditions	The CCG	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	Commissioned Provider	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	GP Practice	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG
	Lancashire Wide/Multiple Organisations	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG
Loss of utilities, including IT and telephone systems	The CCG	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	Commissioned Provider	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	GP Practice	NHS England Area Team with support of CCG as commissioner of IT services through CSU	CCG to support CSU IT team and NHS England Area Team and ensuring CSU IT Business Continuity Plan is initiated	Regular communications between NHS England Area Team and CCG

	Lancashire Wide/Multiple Organisations	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG
Major disruption to staffing, epidemic, transport disruption, industrial action, inability to recruit, mass resignations	The CCG	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	Commissioned Provider	The CCG for local issues of limited severity	CCG may be required to instigate business continuity arrangements dependent on issue.	Upward reporting to NHS England where necessary
	GP Practice	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG
	Lancashire Wide/Multiple Organisations	NHS England Area Team	Provision of support/assistance as required by NHS England Area Team	Regular communications between NHS England Area Team and CCG

Appendix 3

Fuel Shortage Operational Response Plan

1.0 Introduction

1.1 The purpose of this fuel shortage operational response plan is to ensure that the CCG is able to continue to deliver its critical and essential services during a disruption of fuel supplies. The plan outlines the procedures that need to be initiated internally in preparation for fuel shortage and actions that the CCG is required to undertake in line with national guidance issued by the Department of Energy and Climate Change (DECC) and the National Emergency Plan for Fuel (NEP-F) June 2009.

1.2 This fuel shortage operational response plan is designed to ensure that the CCG is able to comply with statutory duties detailed within the Civil Contingencies Act (2004) and should be activated where necessary in support of other associated NHS Chorley and South Ribble CCG and Greater Preston CCG policies, procedures and plans:

- Business Continuity Policy (BCP)
- Major Incident Plan (MIP)
- Emergency Planning, Resilience and Response (EPRR) Policy
- Seasonal Resilience (SR) and Winter Plans

1.3 To ensure the CCG maintains business continuity during fuel shortage, the fuel shortage operational response plan is contained within the CCG Business Continuity Management Policy. A business impact assessment and continuity checklist form part of corresponding CCG business continuity team plans held by each Team Manager within the organisation (see page for the associated template).

2.0 Factors Affecting Fuel Supply

2.1 There are a number of factors which could cause a fuel disruption at regional and national level that the CCG must be aware of:

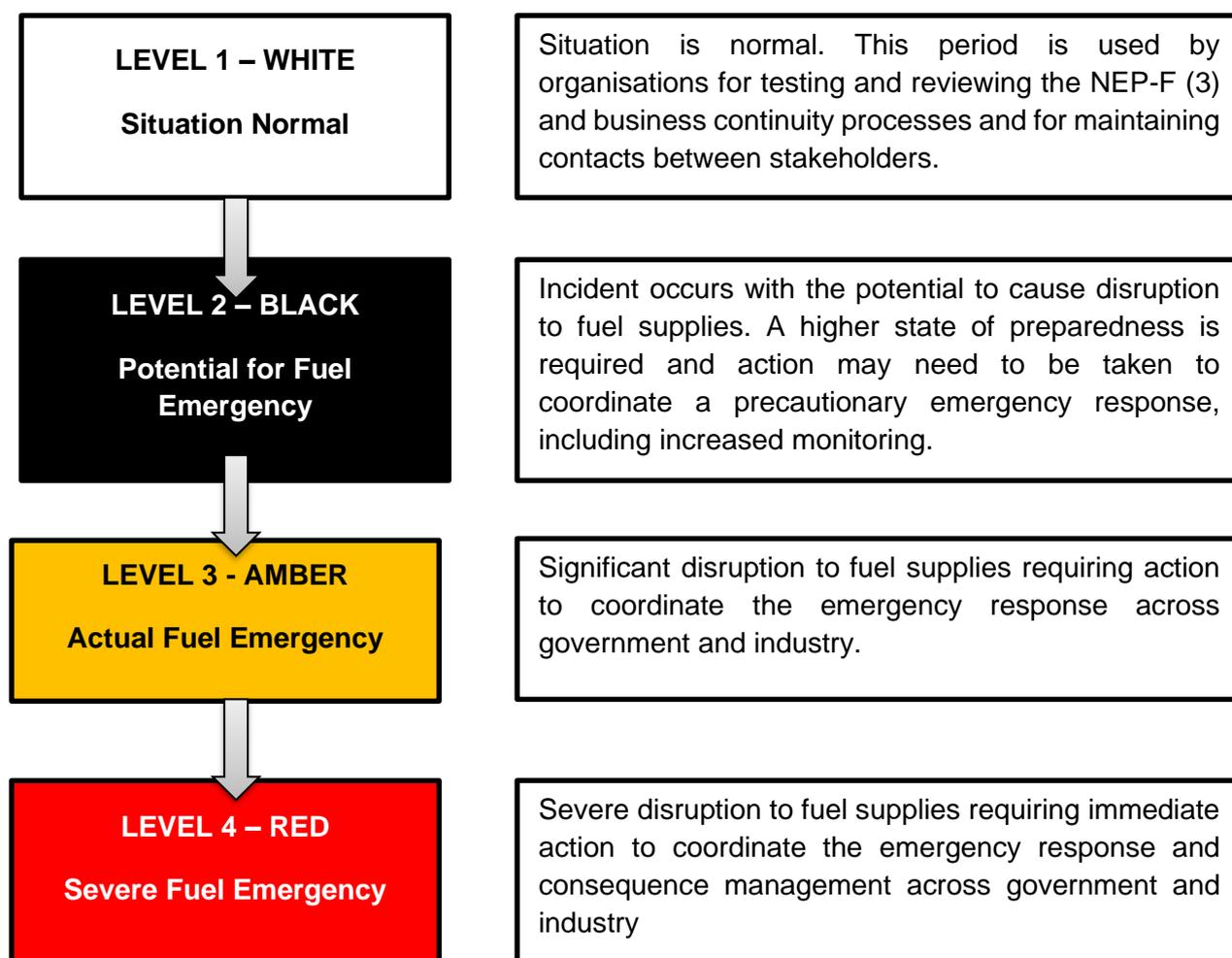
- Scarcity of supply
- Technical problems with the fuel infrastructure
- Industrial action or public protest
- Depleted stocks due to increased customer demand (panic buying) in the event of fuel disruption
- Major Incident, e.g. fire, terrorist attack

2.2 The key to managing a potential fuel shortage effectively is for the CCG to prevent the risk of members of staff 'panic buying' whilst the situation is still normal.

3.0 National Trigger Levels and Activation of the Response Plan

- 3.1 Effective activation of the fuel shortage operational response plan by the CCG as per national trigger levels outlined in the National Emergency Plan for Fuel (NEP-F) will optimise the provision of existing fuel supplies at local and national levels where possible.
- 3.2 There are four national trigger levels which determine action to be undertaken by the Government, the Local Resilience Forum (LRF), NHS England and the CCG.

National Trigger Levels



- 3.3 Actions will be initiated by the CCG and partner organisations as per the indicated national trigger levels from the National Emergency Plan for Fuel (NEP-F). When an actual fuel emergency (Level 3 – Amber) is confirmed, the CCG will activate its business continuity plans and arrangements.

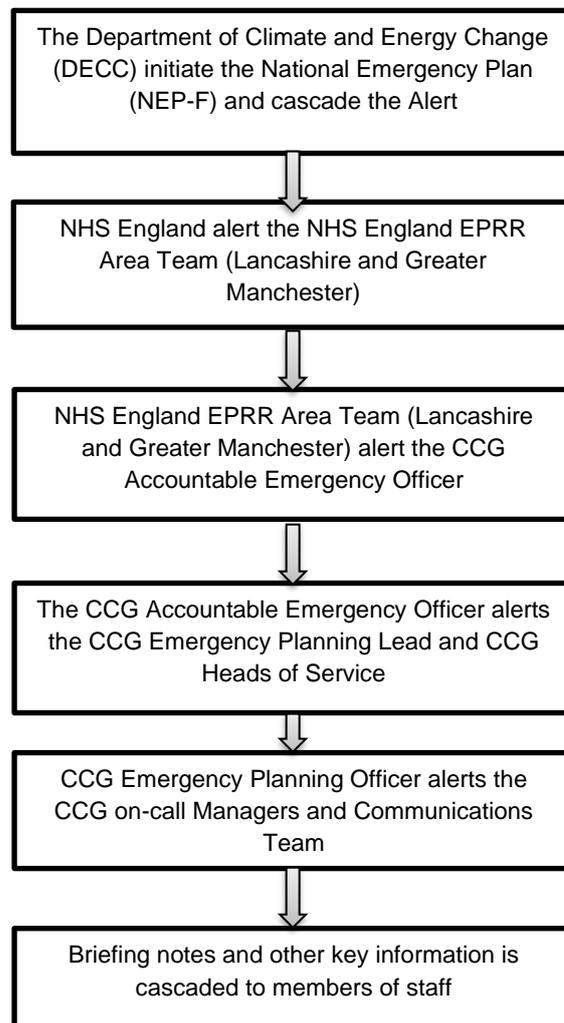
National Level	Local Resilience Forum (LRF) Action	NHS England (NHSE) Action	Clinical Commissioning Group (CCG) Action
Level 1 WHITE Situation Normal	<ul style="list-style-type: none"> Review LRF All agencies to review Business Continuity Plans 	<ul style="list-style-type: none"> Review Business Continuity Plans Engage with other stakeholders 	<ul style="list-style-type: none"> Monitor the situation
Level 2 BLACK Potential Fuel Emergency	<ul style="list-style-type: none"> Initial meeting of LRF General Purposes Group to review the situation and agree appropriate actions, notifications and communications Consider forming a Fuel Disruption Coordinating Group (FDCG) Consider briefing LRF Executive Agree information collation and dissemination protocols Review list of temporary logo users All agencies review Business Continuity Plans Brief Lancashire County Council and Highways Departments 	<ul style="list-style-type: none"> NHSE to link into multi-agency forums (SCG, LRF, Regional Groups) and feed back to other organisations in the county NHSE to convene Fuel Group Consider establishing regular meetings and Sitreps system All organisations to monitor local situation Review BCM and fuel plans Initiate Business Impact Assessment (BIA) Review inter-agency multi aid arrangements Establish internal communications and brief staff, Executive Directors Brief local management teams Instigate Media Strategy in collaboration with LRF Encourage demand calming measures 	<ul style="list-style-type: none"> Establish Communications Strategy (internal and external) Brief Executives Review fuel section of Team Business Continuity Plans Brief on-call Managers Link into NHSE (SR) meetings and teleconferences etc Comfort and calm messages to staff Begin planning mitigation Review Critical Services lists
Level 3 AMBER Actual Fuel Emergency	<ul style="list-style-type: none"> Formation of SCG to be considered Review mutual aid arrangements, e.g. shared bunkered fuel Consider placing DFS sites on notice, having information packs prepared for distribution Organisations to consider using temporary logos in accordance with current guidance (as per national CONOPs) Organisations to activate business continuity plans 	<ul style="list-style-type: none"> NHSE to continue to link into multi-agency forums (SCG, LRF, Regional Groups) and feedback to other organisations in the county Set up Command and Control/Major Incident Control Room Activate regular meetings and increase frequency of the sitreps system Activate BCM plans Directorates to prepare/organise a list of identified essential users to distribute temporary logos Establish and audit system 	<ul style="list-style-type: none"> Put on major incident standby Set meeting/teleconference schedule Activate BCPs Begin or continue mitigation
Level 4 RED Severe Fuel Emergency	<p>National Actions:</p> <ul style="list-style-type: none"> DECC Ministers may take emergency powers under the Energy Act 1976 to manage the fuel disruption that is occurring DECC website updated to contain NEP-F relevant material, e.g. DFS/ESS/UFS lists, advice to DFS operators and MPS/BDS guidance News Coordination Centre established <p>LRF Actions:</p> <ul style="list-style-type: none"> Activation of SCG Set up Designated Filling Stations and provide them with a list of ESS and UFS Users 	<p>Local or Regional Activation</p> <ul style="list-style-type: none"> Lead links into multi-agency forums (SCG, LRF, Regional Groups) and feed back to other organisations in the county Focus on all critical functions Fully activate Command and control Hold daily meetings and Sitreps Liaison with Service Managers Activate mutual aid arrangements <p>National Fuel Plan Activation</p> <ul style="list-style-type: none"> Ensure an up to date list of DFS is distributed to all concerns Organise and distribute temporary logs to essential users by using the attached checklist 	<ul style="list-style-type: none"> Activate Major Incident Set meeting and teleconference schedule Activate BCPs if not already Begin or continue mitigation

	<ul style="list-style-type: none">• Organisations issue temporary logs to critical staff, if not already issued (as per national CONOPs)• Emergency suites/Gold and Silver Commands are staffed as appropriate	<ul style="list-style-type: none">• Conduct and audit of temporary logos	
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4.0 Communications and Alerting Procedures

- 4.1 When a potential fuel emergency (Level 2 – Black) is confirmed, the CCG will establish an internal and external communications strategy.
- 4.2 Any requests from the media with regards to the CCG maintenance of business continuity arrangements during a fuel disruption should be directed to the Corporate Communications Team.
- 4.3 The Corporate Communications Team will disseminate information relevant to the fuel disruption to members of staff via the Intranet, email and staff briefings.
- 4.4 Briefing notes from the CCG's NHS England EPRR Area Team (NHS England Lancashire and Greater Manchester) will be cascaded to on-call Managers upon receipt which will provide updates on contingency planning and any other actions required.
- 4.5 When a fuel incident occurs, the CCG will be notified via the following alerting procedure if the National Emergency Plan for Fuel is activated at Level 4 (RED alert for severe fuel emergency).

Alerting Procedure



5.0 Contingency and Business Continuity Planning for Fuel Shortage

5.1 The CCG aims to follow five steps to prepare for fuel disruption and to ensure effective contingency and business continuity plans are in place throughout the organisation as outlined in '*Business Continuity Management for Fuel Shortages, Guidance for Organisations*' Cabinet office and Department of Energy and Climate Change:

1. Reduce the dependency on fuel
2. Reduce fuel usage
3. Improve resilience (for fuel and other supplies needed to deliver key services)
4. Reallocate resources to deliver only key products and services
5. Effective communication with staff, customers, suppliers and other key stakeholders

5.2 Team Business Continuity Plans identify CCG critical services and provide insight into the effects a disruption to fuel could have on the CCG's ability to maintain 'business as usual' so actions can be put in place to minimise the impact.

6.0 Schemes

6.1 CCG Arrangements – Business Continuity Team Plans ensure Team Managers within the organisation capture critical services that need to be continued in the event of an actual fuel shortage of less than 10 days. The CCG is required to ensure staff provide those essential services and implement possible mitigation options:

- Cancellation of non-essential activities
- Identification of those staff able to work at a neighbouring site closer to home
- A 'Work From Home' Plan taking into consideration work equipment needed
- Rescheduling of non-urgent meetings
- Alternative ways of working, i.e. video/teleconferencing
- Flexible working, reallocation of leave and reduced working weeks
- Cycle to Work Scheme
- Promotion of car sharing and use of public transport
- Voluntary organisation support, i.e. alternative patient transport
- Provision of accommodation where appropriate

6.2 National Activation – In the event of a major national fuel disruption or shortage lasting more than 10 days which poses risk to the economic and social wellbeing of the country, emergency powers may be invoked. The Government in which case may require the CCG to comply with:

- The Maximum Purchase Scheme (MPS) – limiting the public to 15 litres of fuel per visit to the petrol station in order to conserve fuel but provide enough for travel purposes

7.0 Recovery Plan

7.1 The CCG is required to support the continuity of every day activity and the restoration of disrupted services at the earliest opportunity. Recovery plans form part of overall business continuity arrangements detailed within the CCG Business Continuity Management Plan.

7.2 Any services which may have been discontinued or reduced must be re-enabled to full capacity so the CCG can regain Level 1 WHITE 'situation normal' status.

7.3 Staff debriefing should form part of the recovery process to identify lessons learned and ensure corrective actions are incorporated into improving Team Business Continuity Plans.

8.0 Training, Exercising and Review of Plans

8.1 Staff must receive training on how to respond during any kind of fuel disruption and this will be covered within a specialised Business Continuity Management training programme as identified through risk management training needs analysis.

8.2 Exercising of this fuel shortage operational response plan will include the testing of activation and alerting procedures, roles and responsibilities and implementation of schemes identified through robust Business Continuity Team Plans.

8.3 The fuel shortage operational response plan will be reviewed on a bi-annual basis or as national guidance changes, the plan is required to be activated or exercising of the plans require new information to added.