GIG CYMRU NHS WALES

Addysg a Gwella Iechyd Cymru (AaGIC)
Health Education and Improvement Wales (HEIW)

Health Education and Improvement Wales

Crisis Management & Business Continuity

Policy

Policy Owner: Jane Powell & Andrew Paramore

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CRISIS MANAGEMENT AND BUSINESS CONTINUITY POLICY

Executive Sponsor & Function: Glyn Jones, Executive Director of Finance, Planning and Performance	
Document Author(s): Sophie Fuller, Assistant Director of Planning & Performance, Jane Powell, Planning & Performance Business Partner and Andy Paramore, Assistant Planner	
To be Approved by: HEIW Executive Team	
Last Approval Date: V4 26 September 2024	**Next Review Date:** 30 September 2027
Date of Equality Impact Assessment: September 2024	**Equality Impact Assessment Outcome:** This Policy has been screened for relevance to equality. The existing EIA has been reviewed and no material change found. The existing finding of *'No potential negative impact'* remains in place.
Review Cycle: Every three years OR because of a material change to organisational circumstances.	
Distribution: The Crisis and Business Continuity Plan supports HEIW's Crisis and Business Continuity Policy. Both documents can be found electronically on the staff intranet here Business Continuity & Crisis Management and Admin Control as well as in hard copy at HEIW Reception, Ty Dysgu, Cefn Coed, Nantgarw, Cardiff, CF15 7QQ.	
Main relevant legislation and standards: • Civil Contingencies Act 2004 – Emergency Preparedness Guidance. • The Health and Safety at Work Act 1974. • Management of Health and Safety at Work Regulations 1982 (As Amended 1999) • BS ISO 22301:2012 – Societal security – Business Continuity Management Systems – Requirements and BS ISO 22316,Security and resilience – Organizational resilience – Principles and attributes.	

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1. Policy Statement

Sitting alongside Health Boards and Trusts, HEIW is a Special Health Authority within NHS Wales and is the strategic workforce body working to address strategic and specialist workforce issues. This includes a leading role in the education, training, development and shaping of the healthcare workforce in Wales, supporting high quality care for the people of Wales. HEIW also performs the role of shaping culture and leadership across NHS Wales.

This Policy sets out the strategic framework to ensure that HEIW can take effective steps in the event of an incident outlined in section 5.

This threefold approach looks at how HEIW can:

(a) limit emergencies or incidents from happening in the first instance;
(b) prepare plans to ensure that HEIW can continue to exercise its functions in the event of an incident taking place; and
(c) plan to respond to an incident in order to restore normal working after a period of disruption.

All NHS funded organisations have an obligation to meet the legal requirements of the Civil Contingencies Act 2004, the NHS Act 2006 as amended by the Health and Social Care Act 2012 to develop emergency plans and business continuity arrangements.

2. Purpose

The purpose of this Policy is to describe the principles for effective organisational resilience, preparedness and response to an incident that might cause disruption to the delivery of HEIW's core services and functions. The policy identifies the need for an operational plan to describe in detail what response will be needed if a disruption occurs and the capability to adequately react in case of a disruption, through the application and management of robust business continuity arrangements.

3. Scope

The scope of this Policy covers all HEIW staff working within their HEIW capacity, individuals working in Ty Dysgu (HEIW's office headquarters) and remotely, all core services and functions and the facilities and infrastructure that enables delivery and maintenance of services to HEIW.

There is also a requirement to ensure that third party contractors who deliver core services and functions have appropriate contingency arrangements in place.

4. Aims and objectives

This policy provides a structure which describes the strategic and operational responsibilities of those playing a role in managing a crisis and maintaining business continuity.

It puts a plan in place to rehearse methods of restoring critical functions and services to an agreed level and within a specific timeframe. It also aims to proactively improve the resilience of HEIW when faced with the disruption. Furthermore, it delivers a proven capability for managing disruption.

It ensures that HEIW's business continuity arrangements are embedded across the organisation such that all employees are aware of arrangements to enable HEIW to continue to exercise its functions and restore matters back to normal.

It ensures that HEIW's Crisis and Business Continuity Plan is appropriate and available to provide guidance and support during a disruptive incident and has an effective response structure in place for those responsible for managing a crisis.

5. Key Business Continuity Scenarios

The key scenarios outlined below have been identified as part of the Business Impact Assessment Process and will be reviewed annually as part of the test of the Business Continuity Plan. In order to assess our resilience and readiness each scenario has undergone a risk assessment which will be reviewed annually and included below are the main mitigating actions the organisation is taking to ensure its resilience.

	Scenario Title	Mitigating Actions
1	Access to Ty Dysgu becomes unavailable due to a biohazard, fire, flood etc.	• Within the Business Continuity Policy there are a range of infrastructure arrangements that support working from home for all staff. • Key relationships have been identified in the Specialist Estates Services in the NHS Wales Shared Services Partnership if alternative building arrangements are required on a longer-term basis.
2	Major IT outage or cyber incident	• An Incident Response Team (IRT) has been created specifically to deal with major IT outages or cyber incidents to ensure critical business activities are maintained and recovered as efficiently as possible including the identification of an incident manager.
3	Loss of a key supplier/goods	• Each HEIW contract has a relationship manager responsible for monitoring and managing the contract. • Additionally, the Deputy Director of Finance has a central relationship to act as a wider HEIW representative and will oversee relevant risk assessments to identify the impact and liaise with NHS Wales Shared Services Partnership procurement team. • Relationship managers and finance will, where necessary, establish alternative partnerships or agreements to maintain business critical services.
4	Communicable disease outbreak	The Facilities team ensure: • Regular water testing in Ty Dysgu • Regular maintenance of food storage facilities • Sufficient and accessible means for reducing spread of infection (e.g. provision of hand washing facilities or hand-hygiene products) • Arrange additional measures to reduce any heightened risk of infection, i.e. more frequent office cleaning arrangements
5	Terrorist Attack / Mass Civil Unrest	• The Planning and Performance Team will ensure the 5-step response to a major incident/crisis is kept up to date and circulated to the organisation. • The facilities team will ensure evacuation procedure is clear and communicated to staff.

6	Environmental or contamination incident	• The Facilities and Compliance Manager will ensure there are staff qualified to undertake a risk assessment to identify the contaminant(s), the source and extent of contamination and evaluate and characterise the risk and likely illness in the community, including defining the staff and visitors at risk and identify any high risk / susceptible individuals. • Local plans for the facilities team will contain information on key actions for immediate and long-term control measures to reduce exposure for the relevant contamination incident.
7	Global pandemic	• The organisational crisis management and business continuity plan provides an outline of the command structure and 5-step plan for assessing the impact of a global pandemic. • The Command Structure will be responsible for formulating the initial response, advice to staff and any redeployment assessment to support other areas of HEIW or the wider NHS Wales. • A quarterly operating plan for the remainder of the financial year would be initiated to identify the critical work and pause non-critical work programmes.

6. Key Roles and Responsibilities

The Chief Executive

- The Chief Executive owns the Crisis and Business Continuity Policy and Plan.
- The Chief Executive is accountable and responsible for ensuring that HEIW is prepared for emergency situations including Business Continuity incidents. This role is identified by the NHS Emergency Preparedness, Resilience and Response Framework 2015 as the Accountable Emergency Officer (AEO).
- The Chief Executive can delegate the responsibility of AEO to an appropriate HEIW Officer.
- The Executive Director of Finance, Planning and Performance is the delegated AEO for Crisis and Business Continuity Management for HEIW and will be advised by the Assistant Director of Planning and Performance.
- They will have executive authority and responsibility for ensuring that HEIW complies with legal and policy requirements. They will provide assurance to the Board that strategies, systems, training, policies and procedures are in place to ensure an appropriate response for HEIW in the event of an incident.
- The AEO will be aware of their legal duties to ensure that the organisation can respond quickly and efficiently in response to an incident.

Accountable Emergency Officer

- The AEO will provide assurance to the Board that HEIW is meeting its obligations with respect to relevant statutory duties including assurance that HEIW has allocated sufficient experienced and qualified resource to meet these requirements.
- The AEO in consultation with the Crisis Management Team will identify the appropriate external stakeholders and interested parties who may need to be aware of HEIW's Business Continuity and Emergency Planning arrangements.
- The AEO will undertake a lessons learned exercise of the incident with the Senior Leadership Team and ensure the completion and timely submission of any reports to the appropriate authorities as applicable.

Assistant Director of Planning and Performance

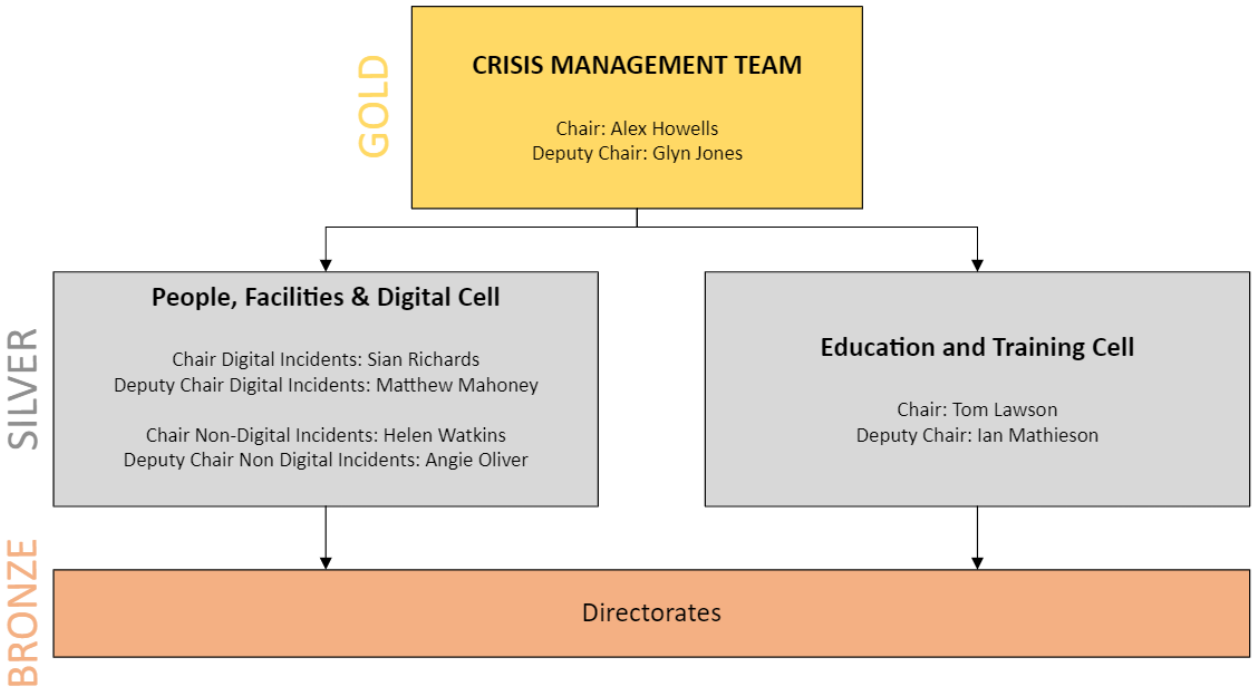
The Assistant Director of Planning and Performance will be responsible for the development and delivery of HEIW's Crisis and Business Continuity Management arrangements and under the direction of the AEO, will:

- Develop, review and test procedures and plans on an annual basis.
- Review and develop the Business Continuity Management Systems in line with industry best practice and the needs of the HEIW.
- Monitor standards and compliance of the system.
- Attend relevant HEIW meetings as required.
- Provide training, support and guidance to managers ensuring that staff and other appropriate, relevant stakeholders such as contractors and suppliers are made aware of HEIW's Crisis and Business Continuity Management arrangements as defined by the AEO and the senior leadership team.
- Engagement with any relevant audit and review requirements.

Command Structure

- Taking the strategic lead, advising the Gold Commander when to activate and terminate HEIW's response plan.
- Managing crisis response and business continuity for HEIW, acting as an intelligence gathering, incident and communications coordination centre.
- Acting as a horizon scanning cell to plan for the worst-case scenario.
- Bringing additional relevant area leads in for decision making and incident response.
- Standing up and down the two sub-cells as per requirements.
- Preparing and agreeing any necessary communication and engagement to internal and external stakeholders.
- Considering and implementing the exit strategy, core business activity and those activities that can be started up again (i.e. the objectives outlined in the IMTP).
- Holding mobile phone numbers for all members of the Crisis Management Team and the two operational cell members in their mobile phone contact lists.
- Leading the lessons learned review.

7. Command Structure



8. Supporting Infrastructure

Laptops
All staff have laptops that enable them to work from home if services remain available.

Staff must ensure they take laptops home at the end of each working day in the event of Ty Dysgu becoming unavailable. Managers should ensure that teams take their laptops home with them to be able to work in the event of the building being unavailable.

For new staff collecting a new laptop, or for staff returning any laptops, arrangements will be made to collect and drop off the laptop either from DHCW in Pontyclun or from Ty Dysgu.

Telephones
If the use of a landline telephone is integral to your role and responsibilities:

- Teams voice will ensure work telephone numbers can be received on work laptops if services remain available.

For staff who do not require the use of a landline telephone:

- In the event of an emergency, an agreed approach to communications will be agreed as part of the triage and made known to staff if relevant and communications are affected.

Mobile Phones
A number of key staff in HEIW have been provided with mobile phones which can provide access to communications. As a temporary arrangement, staff will be required to use their own personal mobile phones to keep in contact with their line manager. See HEIW mobile phone policy.

Microsoft 365
Microsoft 365 is a cloud-based collection of productivity and collaboration products that enable HEIW staff to work and collaborate.

Network Recovery
The Digital team will liaise with DHCW to arrange network recovery. See the Digital Services Recovery Plan.

Service Recovery for Hosted Services
See the Digital Services Recovery Plan.

Working from Home Operating Model
Staff will have access to a laptop, mouse, headset and a laptop charger.

Staff should regularly connect their laptop to the NHS Wales network to ensure that important configurations, policies and updates are applied. Where staff are working remotely this will require the use of the VPN.

Staff can submit a request for VPN access to the cyber security team. Access to the VPN will enable secure connectivity to NHS Wales systems including ESR Management modules and Oracle for authorised staff.

Staff should regularly follow system update procedures as directed by the DHCW system update process and either restart or shut down their laptops when system updates are deployed to ensure that updates are applied correctly. The system update process is managed by DHCW.

Staff are reminded to not store important documents locally on laptops and are encouraged to use NHS Wales available services such as Microsoft OneDrive to store important documents.

Staff are encouraged to familiarise themselves with the Acceptable Use Policy.

New staff are advised to test their laptops and charger at home as soon as possible to identify any issues.

Staff can plug laptops into a monitor / TV screen using a HDMI cable. Keyboards and mice can be attached using a USB port.

All staff with NADEX accounts (i.e., NHS Wales Microsoft accounts) are expected to register for multifactor authentication (MFA). Staff who have not registered for MFA should contact the IT team or DHCW. All Staff who have signed up for multifactor authentication (MFA) have the ability to reset their own Active Directory (NADEX) password using the Azure Self Service Password Reset. Details are available on the staff intranet.

Staff are required to for regular communications and updates. The preferred communications method will be agreed as part of the incident triage and made known to staff.

Staff are advised to use a different supported web browser such as Google Chrome if they experience problems accessing applications using the default browser Microsoft Edge.

Payments and Banking
The financial systems used by HEIW are managed by NHS Wales Shared Service Partnership (NWSSP), and therefore may not be affected by an incident within HEIW. NWSSP also make most payments on behalf of HEIW, including payroll.

In order to access the general ledger to review and process any payments during an incident, finance staff hold VPN tokens to allow them access off-site. Should this fail, emergency payments can be made by:

- Emailing authorisation (in line with the scheme of delegation) to the Accounts Payable section in NWSSP to release payments.
- Accessing the web-based bankline system provided by NatWest bank. Payments can be set up through any internet connected computer. In order to approve payments, two officers will be given access to the NatWest mobile app which replaces the bankline smartcard and readers that are held in Ty Dysgu. Where payments are made using this method but the financial system is not available, the Financial Accounting Team will update the ledger within 1 working day of the system being made available to ensure that all transactions are properly recorded.
- Should a failure occur in the NWSSP systems, emergency payments (including payroll), can be made directly by HEIW through the bankline system. The processing of non-emergency payments through bankline will be considered depending on the expected timescales for the recovery of NWSSP systems.

Financial Reporting
In order to access any required information during an incident, all finance documentation must be stored on the NHS network space, ensuring that appropriate security controls are in place for confidentiality purposes. Access to the Oracle system is available off-site using VPN access, which will allow ad-hoc reports to be produced as required.

9. Operational principles

Principles underlying planning and response

- Plans and the response must be on a risk-based approach, with ongoing review and monitoring.
- Plans must include mutual aid and /or shared agreements to support service delivery and to sustain an integrated response.
- Plans must ensure adequate staffing support for the maintenance of the organisations' business critical services.
- Response arrangements will be based on supporting colleagues and HEIW and the wider NHS Wales system if required to strengthen and supplement normal delivery mechanisms as far as practical.
- Plans will be developed on an integrated multi-professional basis.
- Plans should maintain and support staff health, safety and welfare throughout and after the response.
- Response measures should assess what actions need to be taken to minimise the impact of current plans on education, training and workforce in the future.

Partnership working
HEIW will ensure there are good partnership/multi-agency working and communication arrangements with different healthcare services and other local stakeholders (Health Boards, Trusts and NHS organisations, NWSSP, and Welsh Government, Regulators, Royal Colleges and Trade Unions) in order to ensure that responses are structured and cohesive.

People management
Where the conduct of some staff might warrant a disciplinary intervention, the usual staff disciplinary procedures will apply.

HEIW will ensure that systems are in place for payment of agency staff and agree the criteria for and scale of payment that will be made.

It is possible that due to low staffing levels created by absence from work during an incident, there will be a need to increase the hours worked by those staff still able to work.
HEIW will ensure that sufficient resources are committed to enable adequate training for staff to ensure a sustainable response. All training needs should be tailored to HEIW's specific requirements.

During periods of extended homeworking, staff are to be encouraged to undertake their mandatory ESR training and Welsh language training from home.

As an employer, HEIW will ensure that:
- adequate hygiene (e.g. hand washing) facilities are routinely available to all.
- health and safety responsibilities to employees continue to be fully discharged in order to protect staff, reduce the risks they face and avoid unnecessary staff exposure to risk from infection.
- all staff are encouraged to receive the seasonal vaccine and numbers monitored.

Indemnity and Certification
Ensure that reallocated staff are not working beyond their competence limits, that their professional registration (where relevant) allows them to do so and that insurance arrangements cover their work. Arrangements will need to be made to ensure that other potential staff identified (such as those recently retired) can be provided with certification to work in an emergency.

NHS staff who are redeployed into the NHS must ensure that they have appropriate indemnity. Responsibility for this lies with the Welsh Risk Pool and this will not change should payment be required as a result of an incident.

NHS staff who are redeployed into the NHS will require rapid recertification with their professional body. Health Boards, Trusts and NHS organisations should identify who will need this urgently and the systems in place to provide it. Further guidance on human resource issues, including those of certification, will be issued by the Welsh Assembly Government, in conjunction with the Department of Health and NHS Employers.

10. Governance
Welsh Government if required will confirm the necessary governance arrangements for NHS Wales whilst responding to incidents requiring their oversight. HEIW will need to ensure that its legal responsibilities are discharged especially where they are designed to protect the health, safety and welfare of staff, patients and service users. This will require good risk management based on effective and dynamic risk assessment. It is widely acknowledged that there will be a continued focus on HEIW's governance responsibilities to the public and partners in relation to openness, transparency and accountability but it is accepted the ways these have traditionally been discharged will need to change whilst responding to an incident. As such requests to the amendment of the Model Standing Orders can be made subject to the agreement of the Minister for Health and Social Services.

It is vital during an incident that individual and collective decision-making is effective and stands the test of scrutiny when services and systems return to normal utilising the tools outlined in the Business Continuity Plan.

The Director of Education Strategy and Transformation and the Board Secretary will consider which education or other service contracts need to be suspended or renegotiated in the event of an incident relevant to that area. HEIW should not however destabilise other organisations they have contracts with. It would also be prudent to build into any new contract/service level negotiations contingencies for emergencies.

Welsh Government will provide clear guidance on the minimal expectations about what is or is not maintained with regard to financial management and end of year reporting requirements and a detailed schedule will be issued to Directors of Finance. There needs to be continued focus on good financial governance and increased vigilance of the risk of fraud.

It will be for the Auditor General for Wales to determine the requirements placed upon NHS organisations in Wales and the subsequent audit programme while the Head of Internal Audit will determine the requirements for Internal Audit programmes.

Guidance will be provided on whether Consultations will still need to take place in partnership with the Llais on changes being made in response to an incident but if not, constructive engagement with Llais must still be maintained.

The Public Appointments Unit will provide advice with regard to the appointment of Board members.

HEIW Board meetings will continue to be managed through the preferred communication method depending on the incident. Papers will continue to be circulated on AdminControl unless there is an incident with AdminControl in which case teams or SharePoint will be used.

11. Data and Information Requirements

Information Requirements

In order to maintain an effective response, the CEO will need to collect a number of data streams that will be identified as part of the command structure initiation checklist. These are likely to include:

- Incident timeline
- Risk, Action, Issues and Decisions log
- Financial monitoring
- Critical Service Delivery performance
- Redeployment information
- Staff well-being information

Welsh Government may require HEIW to provide certain key data on behalf of the Cabinet Office on a daily basis and will issue guidance on what is required. Data collection will be crucial for decision making and for the lessons learned exercise and may have a significant impact on the subsequent management of staff.

Information Security
See All Wales Information Security Policy https://heiw.nhs.wales/files/all-wales-information-security-policy-v2/

Employee Data
It is important that HEIW holds appropriate data to identify staff (directly employed/agency/contracted) who could be redeployed during an incident. The people team will maintain a redeployment register holding staff availability, skills set, professional registration/qualification including clinical and non-clinical, home-based location and usual mode of transport so they can be mobilised to work where needed and any transport interruption is factored in.

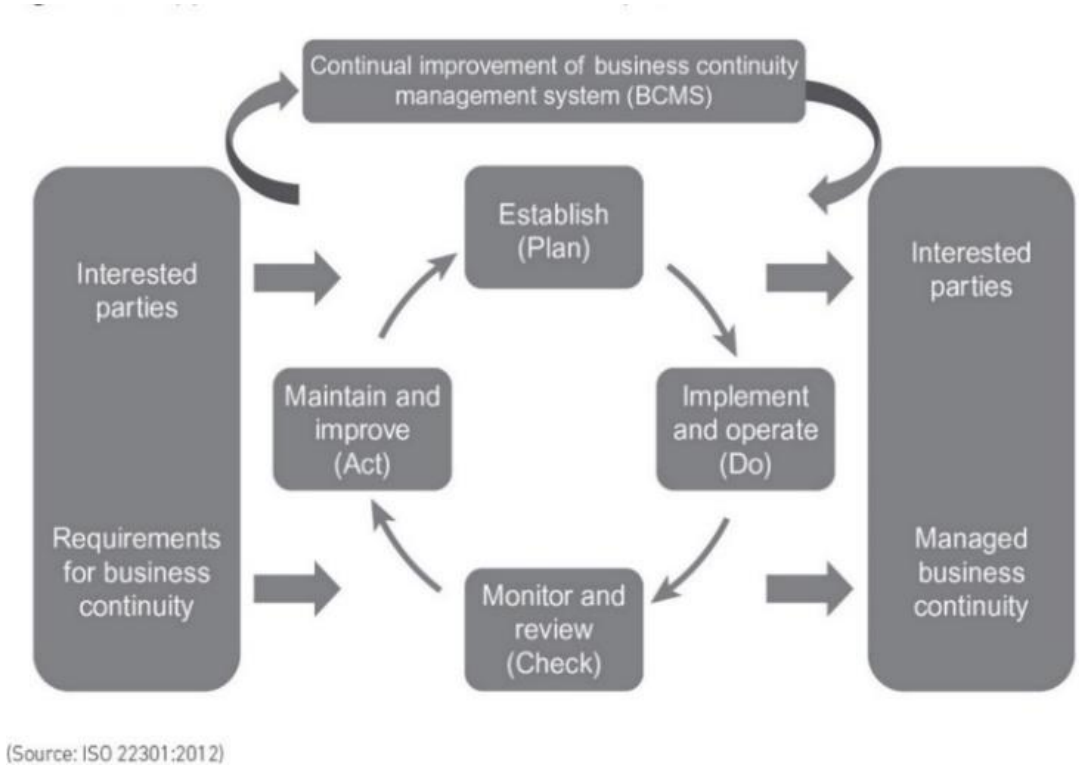
It is essential that HEIW holds appropriate data to identify staff who need to be contacted in the event of a major incident or crisis. Name, role and contact information (such as email and mobile phone numbers) are recorded within the Crisis Management and Business Continuity (CM&BC) Plan to enable all HEIW staff and teams, the Crisis Management Team (CMT) and relevant cells and the Communications and Engagement team to notify certain individuals that a major incident has occurred. Information such as mobile phone numbers held within the CM&BC Plan (a copy of which is in the emergency document boxes) can only be used to contact appropriate individuals in the event of a major incident or crisis. Any other use of this information is strictly prohibited.

12. Business Continuity Monitoring and Review

The Business Continuity Policy will be reviewed every three years but during the annual review of the Business Continuity Plan and Standard Operating Procedure, material risk will be assessed and updates made to the policy where relevant and necessary.

HEIW will adopt the cycle of activity for business continuity as illustrated in the model below.

Figure 1- Plan, Do, Check and Act Model



(Source: ISO 22301:2012)

Plan - Establish business continuity plans describing objectives, process and procedures relevant to improving organisational resilience to, contingency plans, and remedial action to support business continuity in order to deliver results that align the organisation's overall policies and objectives.

Do (Implement and Operate) - Implement and operate the crisis and business continuity plan.

Check (Monitor and review) – Test the crisis and business continuity plan for effectiveness by monitoring and reviewing performance against business continuity plan. Report results, determine and authorise actions for remediation and improvement.

Act (Maintain and improve) - Maintain and improve the Crisis and Business Continuity plan by taking corrective action, based on the results of the review and reappraising the scope of the plan and the policy objectives.

All staff involved in the planning a response to an emergency will receive appropriate training.

13. Audit and evaluation of tests and training

It is vital that the learning points from any tests and training are evaluated, and plans modified accordingly. HEIW will seek evidence of the quality of education imparted to staff, their acquired knowledge and how that understanding is being applied. Similarly, learning points from the handling of an emergency incident will be considered when developing plans. The Planning Team will be clear about what they will assess prior to any exercises, including measures and performance targets.

14. Implementation/Policy Compliance

This Policy will be reviewed a minimum of every 3 years.

15. Training and Development

Training is critical to ensuring the quality of HEIW's performance in addressing a crisis and ensuring the business continuity of the organisation. HEIW will therefore invest time in training and development of its staff in Crisis and Business Continuity processes. A new Crisis and Business Continuity video will be produced for new staff to view during their induction and the People team will arrange for all new line managers with a responsibility for deploying business continuity plans to be briefed on their role and made aware of the content of plans as part of the corporate induction programme.

Line managers will be required to consider the generic skills and training for staff to ensure that they are capable of developing contingency plans and delivering the most appropriate response.

The Executive Director of Finance, Planning and Performance will take the lead in coordinating a lessons learnt exercise from any Gold level incident and communicate any changes to ensure that all staff learn from the experience.

16. Getting help

The Crisis Management and Business Continuity Hub can provide information and guidance to help. If you have further questions, please contact HEIW.Planning&Performance@wales.nhs.uk