

## INTERNAL AUDIT REPORT

**FROM:** Audit and Risk Manager      **SUBJECT:** Emergency Planning & Business Continuity Management

**TO:** Head of Health & Community Protection      **DATE:** 30 March 2015

**C.C.** Chief Executive  
Head of Finance  
Environmental Sustainability Manager  
Civil Contingencies Officer

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### **1 Introduction**

- 1.1 In accordance with the Audit Plan for 2014/15, an examination of the above subject areas has been undertaken and this report presents the findings and conclusions drawn from the audit for information and action where appropriate.
- 1.2 The plan included separate audits of the two topics but, upon discussion with relevant staff, it was decided that the audits should be combined. These topics were last audited in March 2011.
- 1.3 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.

### **2 Background**

- 2.1 Legislation in relation to emergency planning and business continuity management is enshrined in the Civil Contingencies Act 2004.
- 2.2 Part one of the Act places statutory duties on those organisations that have responsibilities to respond to major emergencies affecting communities and this includes local authorities. These 'Category One' responders are subject to six duties:
- A duty to carry out a risk assessment
  - A duty to undertake emergency planning
  - The requirement to have robust business continuity arrangements in place to maintain service delivery
  - A duty to have arrangements in place to warn & inform the public both before and during emergencies
  - A duty to cooperate with partner agencies
  - A duty to share information with partner agencies.

In addition, local authorities have a seventh statutory duty:

- To promote business continuity to local businesses and the voluntary sector.

- 2.3 Emergency planning is a comprehensive process to identify and assess relevant risks, to plan and prepare, to train and exercise, to mitigate the effects, and respond effectively to incidents when they happen. In the aftermath, the role of emergency planning is to support the recovery of affected communities, and the return to normality, and then to review and revise arrangements for future incidents.
- 2.4 Business continuity is similar to emergency planning, but is focused internally. It is about planning to mitigate the effects of disruption to our own critical public services, so that they can continue to be delivered. Whatever the incident, the council should strive for 'business as usual' in service delivery.

### **3 Scope and Objectives of the Audit**

- 3.1 The audit was undertaken to ensure that appropriate measures were in place to enable the council to comply with the duties enshrined in the Civil Contingencies Act.
- 3.2 In terms of scope, the audit covered the following areas:
- Assessment of risk
  - Plans
  - Communication, cooperation and promotion
  - Testing and training.
- 3.3 The audit programme identified the expected controls. The control objectives examined were:
- The council has complied with the Risk Assessment duty enshrined in the Civil Contingencies Act.
  - The council has complied with the Emergency Planning duty enshrined in the Civil Contingencies Act.
  - The council has complied with the Business Continuity Management duty enshrined in the Civil Contingencies Act.
  - The plans in place accurately reflect current processes and best practice.
  - The council has complied with the Community Engagement duty enshrined in the Civil Contingencies Act.
  - The council has complied with the Information Sharing & Co-operation and the Multi-Agency Mutual Co-operation & Co-ordination duties enshrined in the Civil Contingencies Act.
  - The council has complied with the Business Continuity Management Promotion duty enshrined in the Civil Contingencies Act.
  - The plans in place for dealing with emergencies will work if there is a need to implement them.
  - Relevant staff are aware of what to do should an emergency occur.

## **4 Findings**

### **4.1 Assessment of Risk**

- 4.1.1 The Civil Contingencies Officer (CCO) advised that the duty relating to risk assessment is discharged through the Local Resilience Forum (LRF).
- 4.1.2 He highlighted that the risk register is based on the national risk register, with additional risks being included as and when they are identified. There is a lead organisation for each identified risk but the CCO highlighted that the council is not a lead authority for any of them, although he advised that he chairs the Telecoms group. This is working towards a response from the telecommunications companies as to how they would deal with any emergencies.
- 4.1.3 He also advised that, whilst the council is not the lead authority, we are aware of the top risks for the county and also locally. Some of the top county risks do not directly affect the district, as we don't have any of the relevant buildings (e.g. oil refineries and armed forces buildings).
- 4.1.4 The district's top risk is considered to be flooding and, as such, the council has a specific flood plan, which has been endorsed by the Environment Agency, who are the lead partner for dealing with these risks. Other top risks are dealt with national institutions, such as the risk of pandemics being led by Public Health England, and severe weather being the responsibility of the Met Office.
- 4.1.5 A copy of the LRF register was obtained from the Warwickshire County Council website and, upon review, it was identified that it had last been updated and reviewed in April 2013, with all risks shown as having a review date of April 2015.
- 4.1.6 A different version is also produced which is only available to members of the LRF. This looks more closely at the risks, setting out specific impacts that may occur and the mitigation plans and measures that are in place. This was updated in March 2015. A strategic risk report was also drawn up at this time with a number of recommendations being raised to address issues identified.

### **4.2 Plans**

- 4.2.1 A copy of the council's Major Emergency Plan (MEP) was obtained from the Resilience Direct (RD) system. This document includes details of how the council will respond to an emergency and what the different groups (e.g. gold, silver and bronze level responders) are responsible for along with details of who it has been distributed to. The appendix to the plan also shows who fills the relevant roles.
- 4.2.2 A copy of the council's Corporate Business Continuity Plan (CBCP) was also obtained from the system. The document makes a link to the MEP, highlighting that there is a need for synergy between the processes in both documents in order to enable a combined response as necessary.
- 4.2.3 The document includes a number of flow diagrams and organisation diagrams and again shows the responsibilities of the different groups. It also highlights

the different levels of priority for the individual recovery streams, such as buildings and office recovery, human resources recovery and information and processing recovery.

- 4.2.4 It also encompasses the 'alternative accommodation strategy' which sets out the buildings that may be used should Riverside House be unavailable.
- 4.2.5 Underpinning the CBCP are the Service Area Crisis Plans (SACPs). However, upon review of RD, there were only four plans held and, of those, only two had been updated within the last year.
- 4.2.6 This issue had been noted by the CCO and had been raised in a report to SMT in January 2015. The minutes of this meeting suggest that attempts to finalise the outstanding plans by the end of February 2015 would be made. At the time of the audit, the other plans had not been completed although the CCO advised that he had had contact with the departments and was aware that work was underway.
- 4.2.7 The report highlighted that one of the plans which had not been reviewed during the last year (Cultural Services) was actually a standing plan that was supported by other, venue specific, plans.
- 4.2.8 RD included the venue-specific documents for the leisure centres, with Emergency Action Plans for each centre being included in the documents. Minor issues were noted with regards to the dates shown on some of these documents although, upon discussion with one of the Centre Managers, it was highlighted that the versions held were still current as nothing has changed and a formal review would be undertaken in due course.
- 4.2.9 Whilst documents were not held on the system for the other Cultural Services facilities (i.e. the relevant parts of the Pump Rooms and the Spa Centre), copies of relevant documents were either obtained or were viewed during visits to the sites.
- 4.2.10 The two main plans had been reviewed in 2014 (MEP in February and the CBCP in July). The CCO advised that they are both reviewed at least annually, with some aspects (such as contact lists etc.) being updated as and when the need arises. He highlighted that RD was helpful in this regard.
- 4.2.11 He advised that there was not a formal timetable for the reviews and they would be done as and when possible. He suggested that this should become easier to fit in going forward, as his role is evolving, with some specific tasks now being undertaken by the new Corporate Health and Safety Coordinator / Building Manager.
- 4.2.12 As part of the discussions with staff identified in the plans (see below), some issues regarding the make-up of each of the groups had been raised. The CCO highlighted that the structures shown in the resource plans were put in place under the management arrangements at the time, but there weren't enough managers in place. He also highlighted that subject specialists were not always necessary for each role, as long as there was someone in place to think about the issues that may arise.

- 4.2.13 There was also a link to the SACPs in this regard, as they were meant to be a snap-shot of the service area, setting out what is important, who can do what and how to do things if a problem arises. These documents would, therefore, allow anyone else to pick them up and help run the services if the need arose.
- 4.2.14 The CCO highlighted that he was already aware of the concerns over the group memberships as set out in the plans and that these issues were to be addressed during the next reviews performed.

### **4.3 Communication, Cooperation & Promotion**

- 4.3.1 The council's website includes a number of pages on emergency planning and related topics. Included on the main emergency planning page is a link to the council's Emergency Planning Policy.
- 4.3.2 At the time of the initial review, the copy of the policy available from the internet was dated July 2013. However, following discussions with the CCO, an updated version was provided and this was subsequently uploaded to the website.
- 4.3.3 Upon review of the webpages, it was noted that there were no links to the MEP and CBCP plans. The CCO advised that it was not thought relevant to place the plans on the internet as the public would still use the same routes in to the organisation in an emergency as they would when no incidents had occurred, e.g. the council's webpages, corporate email accounts, the customer service centre and councillors.
- 4.3.4 The MEP highlights that there are a number of groups that are established to deal with different aspects of any emergencies that occur. One of these groups is the HR, Media, Stakeholder & Business Continuity group.
- 4.3.5 Included within their responsibilities, as the name suggests, is communicating with stakeholders, with specific tasks including providing staff to maintain the Riverside House reception and other One Stop Shops and issuing appropriate briefings to apprise customers of the situation, to assist in providing information to other staff and agencies, and creating intranet updates for staff.
- 4.3.6 The CBCP includes a Media & Stakeholder Communications Strategy. This is further divided into two parts: the Staff Communication Strategy; and the Public Communication Strategy.
- 4.3.7 As part of the discussions with staff included within the plans (see below), certain staff members were asked whether they had the contact details of their staff. In all cases, this was confirmed to be the case.
- 4.3.8 The CCO also advised that the SACPs should have call-out cascades included and it was the assumption that managers detailed on these documents would have the contact details of their staff.
- 4.3.9 However, he also advised that he felt that the general procedures for keeping staff informed were not sufficient. He had attended a Staff Voice session and they had advised that there was a lot to be done on the provision of information to staff such as, if there was an emergency or Riverside House

could not be opened, how would staff be informed of the emergency and how would messages such as where they should go and whether they would be paid be disseminated.

- 4.3.10 A project is, therefore, being set up to see if certain ideas can be realised, such as sending automated messages to staff or setting up a staff area on the council's internet page. The CCO advised that these are being considered by the Media Team.
- 4.3.11 Both plans include a foreword from the Chief Executive, formally endorsing the plans. The distribution lists included within the documents also highlight that all Heads of Service have received copies of the plans.
- 4.3.12 SMT are provided with a quarterly report from the CCO, giving updates on the plans and any training or test exercises that have been undertaken or are planned. A review of the SMT agendas on the intranet confirmed that these quarterly reports had been produced for all of 2014 and 2015 to date.
- 4.3.13 The CCO also advised that Members are provided with training on emergency planning etc. by the county council, although he highlighted that the new intake (following the May elections) will receive training through WDC.
- 4.3.14 A review of Executive minutes highlighted that Members had approved the plans back in 2009. As part of this approval, they had delegated future reviews and approvals to CMT.
- 4.3.15 As well as the main plans, a draft Elected Members Major Incident Plan document was found on RD. This sets out how the council deals with emergency planning, setting out the plan documents that are in place, and highlighting what the roles of elected Members are. The CCO highlighted that this was more an interpretation of the policy for Members as opposed to a plan, as there were no triggers included.
- 4.3.16 The CCO advised that this document has not formally been approved and the publication was on hold, pending a meeting with the Head of Health & Community Protection.

## **Risk**

**Members may not be sure of their role in an emergency.**

## **Recommendation**

**A decision should be taken as to whether the Elected Members Major Incident Plan is formally issued.**

- 4.3.17 A further summary of steps for Members to take was also available in a 'z card' that had been issued, although this does not make reference to the MEP or the CBCP.
- 4.3.18 The MEP includes reference of the need to work with and provide mutual aid to other responders and makes reference in a number of places as to how this may be undertaken.

- 4.3.19 The CCO advised that the LRF is the main hub for multi-agency working and information sharing. The forum comprises a number of agencies covering the Warwickshire local authorities, NHS bodies and emergency services.
- 4.3.20 The council is represented at all relevant LRF groups, with the CCO attending most of these, the Head of Health & Community Protection attending the Gold group meetings (as delegated by CMT) and the Marketing & Media Officer representing the council at the media group meetings.
- 4.3.21 Upon review of the documentation held on RD, a terms of reference document was identified for the Warwickshire Local Authorities Emergency Planning Group. The CCO advised that this group had largely been inactive in recent times. However, an attempt was being made to resurrect the group, with a meeting being scheduled for later in the month.
- 4.3.22 The CCO advised that the business continuity promotion duty is discharged via the county council, although he advised that the council would help if directly approached. As far as the CCO was aware, this had always been the way that this duty had been discharged.
- 4.3.23 As part of the meetings held with staff (see below), relevant staff (i.e. those who come into contact with businesses) were asked if they had ever played a role in promoting business continuity. Neither of the relevant staff had done so. As suggested above the CCO suggested that, if approached, the businesses would be signposted to the county council.

#### **4.4 Testing & Training**

- 4.4.1 The CCO advised that a number of exercises have been performed in recent years, with some being council-specific and others being multi-agency events. The main council exercises have related to the MEP as opposed to the CBCP.
- 4.4.2 The CCO highlighted that this is largely due to the fact that the CBCP is harder to test as it is more related to a reduction in service. However, he suggested that he intends to run some test events following fire drills, where staff from specific sections will not be allowed back to their desks and will be asked how they would operate, in line with their SACPs.
- 4.4.3 He also advised that there is currently not a formal timetable for when test events will be run. However, he highlighted that plans are in place to run a number of shorter but more regular exercises in the future, so that the plans remain fresher in people's minds.
- 4.4.4 The CCO advised that some of the test events will have 'hot debriefs' at the end of the sessions to identify lessons learnt, with other events having reports produced. A sample report from the 2013 call-out exercise was obtained from RD which included a number of action points.
- 4.4.5 The CCO confirmed that all of the actions were undertaken, apart from one which slipped into the exercise that was undertaken in the following year. Sample evidence was provided showing how some of them had been acted upon.

- 4.4.6 He advised that he had not had an opportunity to write a report in relation to the 2014 call-out exercise and that a decision had been taken not to do a report in relation to the main test event in December 2014 due to the nature of the issues encountered. However, a discussion covering these issues was held when the update report was presented to SMT in January 2015, with the report highlighting that a number of people had not attended the last exercise, despite being available when the course was set up.
- 4.4.7 A number of training events have been held over the last year, including topic specific events run by Bond Solon (log keeping and expert witness evidence giving). Course details, along with lists of participants were held on RD.
- 4.4.8 The CCO advised that the test exercises run would also include training elements (e.g. the last 'full' exercise included a summary of the responsibilities of the different groups).
- 4.4.9 He also highlighted that some, more specific training would be attended, such as relevant members of the Media Team attending communications specific courses and that other, more general, communications courses were also to be held.
- 4.4.10 During the course of the audit, meetings were held with a number of staff identified in the MEP and the CBCP and they were asked a number of questions such as whether they were aware of their inclusion on the plans, whether they were aware of their roles and responsibilities, whether they had attended any training or test exercises and whether they felt that these were sufficient.
- 4.4.11 Those sampled from the Silver and Gold groups and the Intelligence Officer were all aware of their inclusion and their roles and were generally satisfied with the testing and training, subject to issues raised elsewhere in the report.
- 4.4.12 However, those identified as being Bronze level responders were generally unaware of their inclusion and, as such, were not aware of the roles and responsibilities and had not received any training.
- 4.4.13 The CCO advised that this was generally due to the fact that these roles were only suggestions of the types of staff that might be needed and were incident dependant. He further highlighted that, in essence, their roles in the emergencies would be just to do their jobs, albeit in different circumstances.
- 4.4.14 He therefore suggested that it was not felt that they needed specific training on the plans. However, it is felt that consideration should be given to running some awareness training, so that those shown in the Bronze groups, or even staff in general, would be aware that the plans exist.

## **Risk**

**Staff may be unsure of what to do in emergency situations.**

## **Recommendation**

**Consideration should be given to undertaking some general awareness training for staff that are not included in the Gold and Silver groups.**



- 4.4.15 One other ad-hoc issue that was raised during the discussions was that one sampled staff member lived outside the district and suggested that he wouldn't necessarily know how to get to certain places if his satnav wasn't working. Another staff member had included a map of the district within his copy of the plans and this was thought to be a good idea. Whilst it is not thought to necessitate a formal recommendation, it is felt that consideration could be given to including a map of the district within the MEP and CBCP documents when they are next reviewed.

## **5 Summary & Conclusion**

- 5.1 Following our review, we are able to give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of Emergency Planning and Business Continuity Management are appropriate and are working effectively to ensure that the council fulfils its duties under the Civil Contingencies Act.
- 5.2 A couple of relatively minor issues were, however, identified relating to the status of the Elected Members Major Incident Plan and the possible need for plan awareness training for staff.

## **6 Management Action**

- 6.1 Recommendations to address the issues raised are reproduced in the Action Plan together with the management response.

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