ABERDEEN CITY COUNCIL

COMMITTEE	Audit Risk and Scrutiny Committee
DATE	23 March 2023
EXEMPT	No
CONFIDENTIAL	No
REPORT TITLE	Business Continuity – Annual Report
REPORT NUMBER	COM/23/069
DIRECTOR	Gale Beattie
CHIEF OFFICER	Jenni Lawson
REPORT AUTHOR	Ronnie McKean
TERMS OF REFERENCE	1.2

1. PURPOSE OF REPORT

1.1 To provide the annual assurance report on the Council's Business Continuity arrangements that are required to comply with the requirements of a Category 1 responder under the Civil Contingencies Act 2004.

2. RECOMMENDATION(S)

That the Committee notes the activities undertaken in 2022 and planned in 2023 to review, exercise and improve the Council's Business Continuity arrangements.

3. CURRENT SITUATION

Legislative context

3.1 The Council is required to have Business Continuity arrangements in place as a Category 1 responder, as defined by the Civil Contingencies Act 2004, specifically:

- To maintain Business Continuity Plans (BCPs)
- To promote business continuity by providing advice and assistance to businesses and voluntary organisations

3.2 The Council's Business Continuity arrangements aim to increase the Council's resilience and minimise as far as is practicable the possible risk of disruption to Council services, particularly critical services. Given the number and range of critical services which the Council delivers, the continuing threat to these must be carefully mitigated.
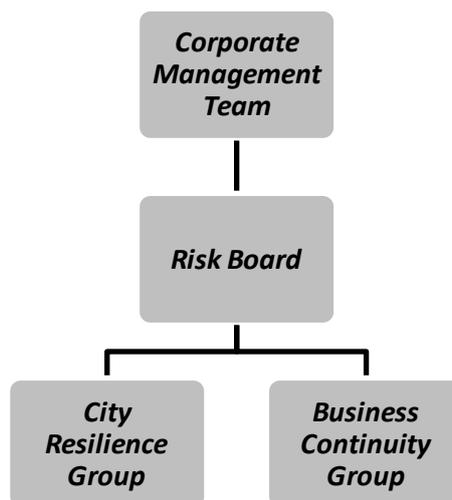
Disruptive events that may trigger activation of Business Continuity arrangements include:

- Loss of staff e.g., through illness, industrial action
- Loss of access to premises e.g., through power outage, flooding

- Loss if key I.T. systems/infrastructure e.g., through cyber-attacks or firewall failures
- Loss of key supplier/s e.g., through market disruption and wider economic forces.

Internal Governance

3.3   The Council's Risk Management and Business Continuity arrangements are complementary, working together to identify and manage the risk of disruption. Business Continuity Plans (BCP) are control documents that are designed to respond to, and mitigate risks identified by officers within risk registers that could affect the delivery of Council services. Our plans provide a framework that supports officers to anticipate, prepare for, prevent, respond to, and recover from disruptive events within agreed timescales.

3.4   Plans and the accompanying guidance are designed to support officers to assess the impact of disruptive events in order to develop robust activation and recovery plans that account for:

- Identification of critical services/processes
- Minimum levels of service and maximum period of disruption
- Minimum resources (staff, technology)
- Key roles and responsibilities required to deliver the plan
- Actions and activities required for plan activation and recovery

3.5   The Risk Board retains oversight of the Council's preparedness and response to incidents and emergencies which are undertaken by the City Resilience Group (reported to the Communities, Housing and Public Protection Committee) and the Business Continuity Group (BCG) reported to Audit, Risk and Scrutiny Committee.

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3.6   The Council's BCG is chaired by the Corporate Risk Lead (CRL) and helps to provide assurance to the Risk Board that:

- Critical services and functions have plans in place;
- Plans are maintained and reviewed;

- Plans are tested in accordance with the testing/exercise schedule; and
- Good practice and improvement activities can be shared and communicated with other plan holders across the organisation.

Summary of Activity in 2022/23

3.7   The Group's activities in 2022 focused principally on 1) the commencement of table-top exercises in accordance with the 2022 Plan Test List and 2) very specific activities to ensure that all Clusters' and ALEOs' plans were prepared to respond to the impact of planned and unplanned power outages due to energy shortages in the winter months. There was also a particular focus from services whose activities were likely to be affected by industrial action to ensure continuity of service provision and risk of disruption is minimised. Service Management Teams in Education and Waste have refreshed and reviewed plans.

3.8   <u>Waste and Recycling Service</u>

The Waste and Recycling Service was affected by a period of industrial action in August 2022 which resulted in the service activating Business Continuity arrangements. The service recognised that existing plans could be improved to reflect the decisions and activities undertaken during the activation period, updates included:

- Re-evaluation of periods for minimum levels of service.
- Impact of non-collection affecting roads, footpaths and multi-storeys and other properties with bin chutes.
- Addition of a specific section for Industrial Action that includes the need for a comprehensive risk assessed recovery plan once services are resumed.

3.9   <u>Education Service</u>

The Education Service Management team worked with Head Teachers to generate risk assessments for each school setting prior to industrial action taking place. The risks assessments were consolidated and shared with each Head Teacher to ensure that the risks identified could be addressed. This approach supported Head Teachers and school Support Staff prepare for industrial action by having existing plans refreshed to reflect both the risks, actions to mitigate and best practice. The risk assessments and plans will continue to be reviewed and refreshed as required if further dates for industrial action affecting the City's school settings are announced.

3.10   <u>Planned and Unplanned Power Outages</u>

The Council's Winter Preparedness activities included a scenario-based exercise which focused specifically on the low risk of Rota Load Disconnection (RLD) and Demand Control OC-6. These are planned power outages for a 3-hour period in predefined geographical areas across the UK that are aligned with postcodes.

The exercise was conducted with Chief Officers and the Council's Arm's Length External Organisations (ALEOs) and allowed Officers and ALEO's to identify potential risks and mitigating actions resulting from the exercise so that Officers and ALEO's were able to review and update their existing BCP as required.

3.11   Critical Service List

The Council's Critical Service list details the Council's services that have been assessed by officers as being the most important to continue to be delivered as far as is practicable.

The list is reviewed annually by Chief Officers to ensure that it remains relevant and up to date. It is used to establish the criteria for and priority for plan exercising and to inform exercise scenarios and suitable combinations of plans for exercising.

Each service added to the list is allocated with one of the following categories:

Red	Critical to the Local Resilience Partnership Response	These are services that perform activities and functions that are essential to support the Council's response as a Category 1 responder.
Yellow	Critical to protect vulnerable people	These are services that perform activities and provide services that are essential for the safety and wellbeing of vulnerable people.
Green	Critical Digital Technology	These are services that digital systems and technology to support Red, Yellow and Grey Critical Services.
Grey	Organisationally Critical	These are services upon which the red, yellow and green categories depend, as well as services which ensure the Council meets statutory obligations which still need to be met during the emergency or business continuity event(s)"

3.12   Review of Plans Activated

The BCG reviewed the activation of Business Continuity arrangements by the Waste and Recycling Service in response to the fire in Altens and industrial action affecting waste services. It was agreed that a presentation will be provided to the BCG by the Waste and Recycling Centre Manager in the second quarter of 2023, covering the fire event, service response, effectiveness of the existing plan and lessons learned including updates to the existing plan. This will be a valuable learning opportunity for other services, particularly in relation to the risk of on-going industrial action in a number of Council services.

3.13   Exercising of Plans

The 2022 Testing/Exercise plan comprised of table-top exercises. The Council's Critical Service list was used to identify and select the plans to be tested.

Each exercise covered 2 scenarios; City Centre Power Outage and Loss of Building and focused primarily on critical services that;

- Provide services to our vulnerable customers.
- Provide face to face contact to our customers.
- Provide services that communicate externally with suppliers and citizens.
- Provide services that make payments to people and suppliers.

The exercises completed exercised plans for the following Critical Services:

- Homelessness and Allocation Service
- Universal Credit and Benefit Support, Viewings and Lettings
- MAPPA (Multi-Agency Public Protection Arrangements)
- Financial Inclusion Team
- Commercial and Procurement, Category and Contract Management
- Purchasing
- External Communications

The exercises revealed some gaps within individual plans and areas for update and improvement which will be overseen to completion by the BCG:

- Interdependencies with other services required to contribute to or provide resource to enable plan delivery,
- Methods of communicating with staff and partner organisations,
- Day to day use of MS Team and Sharepoint not reflected within plan actions and activities.

In summary, each exercise was successful allowing for officers to review, discuss and share good practice that could be reflected in other plans. The City Centre Power Outage scenario highlighted the limitations and severe restrictions on the activities and services could realistically be provided in this scenario.

3.14   School Business Continuity Arrangements

The Education Service continued to conduct an annual review of plans and arrangements in each school setting ahead of Term 1. These reviews provide Head Teachers and support staff with an opportunity to improve and update existing plans and for new staff to familiarise themselves with the locations of the plans and individual roles and responsibilities required for plan activation.

Updates and improvements to plans include shared best practice identified, updates to security arrangements, structural changes to account for new pupil intake accessibility requirements, updates to school contact information including staff and key suppliers. The updates provide Head Teachers and support staff with the assurance that plans are accurate, up to date and reflect completed risk assessments.

3.15   Internal Audit Recommendations

Oversight and monitoring of internal audit recommendations in 2022 that related specifically to Business Continuity arrangements included the recommendation that copies of the Council's BCP should be held in a secure offline location. This would enable access to plans in the event of a major failure of the Council's IT infrastructure resulting from a ransomware attack or similar disruptive event.

The BCG supported the activities required to complete and close the recommendation as required.

Planned Activity in 2023/24

3.16 Development and improvement activities will continue in 2023/24 and will focus on the continued development of the Business Continuity Framework and plan improvement through activation debriefs/lessons learned and exercising and will include:

Quality Assurance Exercise

It is expected that the Council's external risk environment will continue to be volatile during 2023, including the ongoing risk and effects of industrial action, wider economic instability and weather disruptions. These risks place further emphasis on the requirement to have plans that remain robust and fit for purpose. To this end, a Quality Assurance exercise is currently underway to assess the content and state of readiness of each plan.

This exercise has identified areas for improvement to existing plans, including the addition of arrangements and activities resulting from industrial action, power outage, assurance, and verification of BCPs, and arrangements from key suppliers and the actions and activities required to escalate plan activation and recovery strategies.

The results of the review will be reviewed with Chief Officers and the BCG will be utilised to support the activities identified and required.

Exercising of Plans

Table-top exercises will commence upon the completion of the Quality Assurance Exercise which will be used to inform the 2023 Testing/Exercise plan which will be provided to the Risk Board for review and approval.

4. FINANCIAL IMPLICATIONS

4.1 There are no direct financial implications arising from the recommendations of this report.

5. LEGAL IMPLICATIONS

5.1 There are no direct legal implications arising from the recommendations of this report.

5.2 The Council's existing Business Continuity framework and arrangements support compliance with legislation including the Civil Contingencies Act 2004.

6. ENVIRONMENTAL IMPLICATIONS

6.1 There are no direct environmental implications arising from the recommendations of this report.

7. RISK

7.1 The Council's Business Continuity plans and supporting activities contribute to the Council's overall system of risk management.

7.2 The assessment of risk contained within the table below is considered to be consistent with the Council's Risk Appetite Statement.

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H) *taking into account controls/control actions	*Does Target Risk Level Match Appetite Set?
Strategic Risk	None			
Compliance	Non-compliance with legislation.	Effective Business Continuity plans and arrangements in place will support compliance with legislation as required.	L	Yes
Operational	Disruptive events may affect service delivery	Effective Business Continuity plans are designed to mitigate disruption to service delivery as far as is practicable.	L	Yes
Financial	None			
Reputational	Negative publicity in media/social media platforms to Council's response to a disruptive event.	Effective Business Continuity plans and arrangements are designed to support minimum levels of service as far as is practical including communication and information sharing with citizens.	L	Yes
Environment / Climate	Severe weather events may affect delivery	Effective Business Continuity plans are designed to respond to and minimise disruption	L	Yes

	of Council services.	resulting from weather related events as far as is practicable.		

8. OUTCOMES

8.1 The proposals in this report have no impact on the Council Delivery Plan.

9. IMPACT ASSESSMENTS

Assessment	Outcome
Integrated Impact Assessment	Not required.
Data Protection Impact Assessment	Not required.
Other	Not applicable.

10. BACKGROUND PAPERS

10.1 None.

11. APPENDICES

11.1 Not applicable.

12. REPORT AUTHOR CONTACT DETAILS

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