



**FINAL INTERNAL AUDIT REPORT**  
**ENVIRONMENT AND PUBLIC PROTECTION DEPARTMENT**

**REVIEW OF BUSINESS CONTINUITY AND EMERGENCY PLANNING**

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## **REVIEW OF BUSINESS CONTINUITY AND EMERGENCY PLANNING**

### **INTRODUCTION**

1. This report sets out the results of our audit of Business Continuity and Emergency Planning. The audit was carried out as part of the work specified in the 2019-20 Internal Audit Plan agreed by the Section 151 Officer and Audit Sub-Committee. The controls we expect to see in place are designed to minimise the Council's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be addressed by management.
2. The Emergency Planning and Corporate Resilience Team in the Council is responsible for the maintenance of the Business Continuity Management and Emergency Planning processes within the borough, including ensuring that all documentation and procedures are compliant with the Civil Contingencies Act 2004. However it is a requirement of Service Heads to take ownership of the Business Continuity Plans themselves, along with the testing of their specific plans. The Emergency Planning and Corporate Resilience Team is also tasked with embedding processes and procedures in the interest of maintaining a Council-wide culture and understanding of Business Continuity and Emergency Planning. The team collaborate with other local boroughs and agencies to help ensure the both general and borough specific risks are suitable mitigated.
3. We would like to thank all staff contacted during this review for their help and co-operation.

### **AUDIT SCOPE**

4. The original scope of the audit was outlined in the Terms of Reference issued in May 2019.
5. The following were considered to be the key risks inherent to the Business Continuity and Emergency Planning process:
  - Emerging risks may not be identified in a timely manner and therefore major incidents may then severely impact on the operations of the Council (if there is little buy-in to the Council's Business Continuity / Emergency Plan).
  - In the absence of policy and procedures, or if roles and responsibilities for business continuity and emergency planning are not made clear, there may be inconsistency and lack of direction in the performance of resilience functions.
  - The Council may lack oversight and support to help ensure it can mitigate against the severity of potential business continuity / emergency planning impacts and staff members may not able to effectively execute their tasks during such situations.

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- Unplanned / unforeseen events may result in severe business interruptions if there is no buy-in to the Council’s plans for how it can ensure business continuity. Emergency plans may not adequately mitigate the risks associated with emergencies (if they are not tested periodically). If action plans are not developed and reviewed, following incidents, risk exposure may not improve into the future.
- In the absence of sufficient management level reporting, the Council’s senior management may fail to have visibility over the status of business continuity / emergency planning compliance. The Council may also not be aware of best practices etc.

**AUDIT OPINION**

6. Our overall audit opinion, number and rating of recommendations are as follows.

<b>AUDIT OPINION</b>	
<b>Limited Assurance</b>	<b>(Definitions of the audit assurance level and recommendation ratings can be found in Appendix B)</b>

<b>Number of recommendations by risk rating</b>		
<b>Priority 1</b>	<b>Priority 2</b>	<b>Priority 3</b>
<b>2</b>	<b>3</b>	<b>0</b>

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### SUMMARY OF FINDINGS

7. Controls noted to be in place and working well at the time of our audit fieldwork and based on the audit testing conducted, included:
- The Emergency Planning and Corporate Resilience Lead reports to the South East Sub-Regional Resilience Programme Board, and the Local Authorities Panel – Implementation Group. Both groups embolden local collaboration in Emergency Planning developments, and feed into London Resilience Partnership, which helps ensure emergency preparedness for the whole of London.
  - The Emergency Planning and Corporate Resilience (EPCR) Lead chairs the Bromley Borough Resilience Forum with the purpose of being the focal point for local multi-agency preparedness, response and recovery planning.
  - Emergency Centre Plans, as required by the London Local Authorities Concept of Operations for Emergency Response and Recovery, are in place.
  - In accordance with the Civil Contingencies Act 2004, the risk of an emergency occurring has been assessed by the ECPR Lead and the Bromley Resilience Forum, resulting in a Community Risk Register being published.
  - The interim Minimum Standards for London (MSL) self-assessment was completed in October 2018 and identified areas for development. The Corporate Resilience Team has since taken mitigating actions in preparation for the Resilience Standards for Local Governments audit, which is due to take place in December 2019.
  - The Business Continuity Policy and Management Strategy highlights the roles and responsibilities of key members of staff. Furthermore, examination of a random sample of 10 completed Business Continuity Plans (from a total population of 47), identified all as containing the responsibilities of staff and key contact information.
  - There are guidance handbooks available defining the roles and responsibilities of the key members of staff identified in the London Local Authorities Concept of Operations for Emergency Response and Recovery.
  - Standardisation Programme training was provided by EPCR Lead for the key members of Resilience staff.
  - Regular table top exercises are completed in relation to Emergency Planning for both the London Resilience Partnership (pan-London test event) and the Bromley Resilience Forum (Bromley specific test event).

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8. We would however like to bring to management attention the following issues:
- Not all Business Continuity Plans have been fully completed. The main content of the plans are completed by the EPCR Lead and then sent to the relevant Heads of Service for personalisation. Examination of the Business Continuity Plans tracker spreadsheet identified that at the time of the audit 13 out of 47 plans had not been fully completed and received by the EPCR Lead. Furthermore, none of the plans have received final approval from the respective departmental Director.
  - Since not all Business Continuity Plans have been completed, rounds of testing and exercising have not yet been initiated. Therefore, the functionality and effectiveness of plans have not been established, potentially limiting their reliability in a real life scenario.
  - The Business Continuity Policy and Strategy Statement has not yet received final approval from the Chief Executive. The document outlines the Council's Business Continuity Management process and proposals for embedding Business Continuity throughout the organisation.
  - The Business Continuity Policy and Strategy Statement proposes that business continuity should be incorporated into the staff induction process; e-mail bulletins; 'onebromley' webpages, and staff development training sessions. However, these systems identified as being necessary to help embed Business Continuity, have not yet been implemented.
  - It is proposed in the Business Continuity Policy and Strategy Statement that Business Continuity and Emergency Planning should be a consistent agenda item at Executive meetings. However, this proposal has not yet been enacted.

## **DETAILED FINDINGS / MANAGEMENT ACTION PLAN**

9. The findings of this report, together with an assessment of the risk associated with any control weaknesses identified, are detailed in Appendix A. Any recommendations to management are raised and prioritised, together with management's responses and timescales for implementation. Appendix B details the definition of the audit assurance and priority ratings.

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DETAILED FINDINGS AND ACTION PLAN

APPENDIX A

No	Finding	Risk	Recommendation and Priority *Raised in previous Audit	Management Response	Agreed timescale and responsible manager
1	<p><u>Completion and Approval of Business Continuity Plans</u></p> <p>Discussion with the ECPR Lead established that the previous Corporate Resilience Lead met significant issues in ensuring Business Continuity Plans were being completed in a timely manner. Upon arriving twelve months ago, the ECPR Lead has revised the process, and now completes the majority of each plan's content before it is sent to the Head of Service for personalisation (adding the information present in Section 5 of the plans). This has seen an increased uptake in the timeliness of plan completion, however, examination of the BCP tracking spreadsheet identified that at the time of the audit 13 plans were still</p>	<p>Where a Business Continuity Plan is not in place for each identified service area, there is a risk of affected services not having the capacity to function in the event of an emergency. Furthermore, without final approval from Directors, the validity of Business Continuity Plans remains limited.</p>	<p>Management should:-</p> <p>(i) Finalise all outstanding Business Continuity Plans, and where necessary, escalate outstanding plans to the relevant departmental director.</p> <p>(ii) Meet with all respective Directors for final approval of completed Business Continuity Plans.</p> <p>(iii) Maintain an annual reviewing schedule of all Business Continuity Plans.</p> <p><b>Priority 1</b></p>	<p>1) All business continuity plans are now finalised.</p> <p>2) One meeting has already been held, all others have been diarised</p> <p>3) To be set by Corporate Leadership Team (CLT), facilitated by EP &amp; CR lead, following acceptance by Chief Officer Executive (COE) of Business Continuity Management (BCM) policy &amp; strategy framework on 17.12.19.</p>	<p>1) Complete</p> <p>2) End Jan 2020 – Emergency Planning &amp; Corporate Resilience (EP &amp; CR) lead</p> <p>3) End of financial year - CLT</p>

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	<p>outstanding, having been sent to the service for personalisation but not yet completed.</p> <p>Furthermore, in the interest of confirming the contents and prioritisation ratings given to each service, it is the intention of the ECPR Lead to obtain final approval from the relevant departmental Directors. This process of approval has not yet been initiated as the plans are still being completed.</p>				

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No	Finding	Risk	Recommendation and Priority *Raised in previous Audit	Management Response	Agreed timescale and responsible manager
2	<p><u>Testing of Business Continuity Plans</u></p> <p>Discussion with the EPCR Lead established that testing of the Business Continuity Plans has not commenced due to not all plans being completed and approved.</p> <p>It has been suggested to plan owners that they are responsible for testing their plan at least annually, however, formal action has not been taken with regards to testing due to many plans being incomplete.</p> <p>Furthermore, the Business Continuity Policy and Strategy Statement suggests that exercising should be recorded as part of a testing schedule.</p>	<p>Where Business Continuity Plans have not been tested, there is no confirmation the plans works in practice, or that staff are aware of their responsibilities. This may limit the effectiveness of plans in real life events.</p> <p>Furthermore, where lessons are not learned as a result of plan exercises, there is a risk that issues identified during the exercise may not be used to improve the plan quality.</p>	<p>Management should:-</p> <p>(i) Ensure plan owners are testing their plan at least annually, and the result of plan exercises are documented in a testing schedule.</p> <p>(ii) Once issues have been identified, an action plan should be produced for each service to improve the effectiveness of their plan. An action plan should be produced as a result of each walkthrough if necessary.</p> <p>(iii) Even where formal plans are yet to be documented, insist services still conduct a localised test / scenario (on the basis that testing and letting services fail may be the best way to identify what arrangements need to be put in place).</p> <p>(iv) Clear ownership / responsibility should be assigned to ensure the above steps are driven forward / escalated to full implementation.</p> <p><b>Priority 1</b></p>	<p>1,2 &amp; 4) These processes and subsequent assurance will be achieved through the BCM cycle that will be produced by the EP &amp; CR lead for adoption &amp; delivery by CLT.</p> <p>3) All plans have now been completed and will be subjected to the testing &amp; exercise regime contained within the BCM cycle documentation owned by CLT.</p>	<p>1,2 &amp; 4) document prepared by EP &amp; CRC lead for next CLT meeting, in Feb 2020.</p> <p>3) No longer applicable</p>

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3	<p><u>Business Continuity Policy and Strategy Statement</u></p> <p>The Business Continuity Policy and Strategy Statement that outlines the tenets of the Council's Business Continuity Management process had not been approved by the Chief Executive.</p> <p>Discussion with the EPCR Lead established that, although the policy had been discussed with the Chief Executive, there was no final approval and sign off. It was evident that the policy had been recently updated in September 2019. Approval of the document would act as a mandate of the proposals for embedding Business Continuity throughout the Council.</p>	<p>Where the Business Continuity Policy and Strategy Statement has not been signed off by the Chief Executive, there is an absence of a Council-wide buy-in of the Business Continuity Management processes and upcoming proposals.</p> <p>This could result in a restriction on the Emergency Planning and Corporate Resilience Team's ability to embed expected processes.</p>	<p>Obtain final approval and sign off of the Business Continuity Policy and Strategy Statement from the Chief Executive. The approved policy should be made accessible to staff.</p> <p><b>Priority 2</b></p>	<p>1) Policy &amp; Strategy framework authorised by COE on 17.12.19</p>	<p>1) Complete</p>

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4	<p><u>Embedding Business Continuity and Emergency Planning</u></p> <p>The Business Continuity Policy and Strategy Statement positions that the EPCR team continually seeks to integrate Business Continuity into day to day activities and organisational culture. It is suggested that this will be achieved through incorporating Business Continuity into the staff induction process, e-mail bulletins, 'onebromley' webpages, and staff development sessions.</p> <p>Since the policy has not yet received Chief Executive approval, the embedding techniques are not currently in place.</p>	<p>Where Business Continuity is not embedded in Council operations, there is a risk that staff and Heads of Service are unaware of their role and the importance of Business Continuity. This could result in plans being implemented ineffectively in the event of a real life emergency.</p>	<p>Management should incorporate Business Continuity and Emergency Planning into the following systems:-</p> <ul style="list-style-type: none"> <li>(i) The staff induction process</li> <li>(ii) E-mail bulletins</li> <li>(iii) 'onebromley' webpages</li> <li>(iv) Staff development sessions</li> </ul> <p style="text-align: center;"><b>Priority 2</b></p>	<p>1 – 4) Work has begun to develop the below areas, working with HR and Transformation team to embed.</p>	<p>End of financial year – EP &amp; CR lead</p>

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5	<p><u>Executive Meeting Agenda</u></p> <p>In accordance with the Business Continuity Policy and Strategy Statement it is proposed that "the Chief Executive will chair CLT meetings, which are held on a monthly basis. Business Continuity Management will be a standing agenda item with progress reported upon bi-monthly."</p> <p>As per finding 3 of this report, there is currently no consistent buy-in of the Business Continuity and Emergency Planning developments, and no avenue to report issues up the chain of hierarchy.</p>	<p>Where developments and issues are not reported to the Chief Executive on a regular basis, there is a risk that such topics are not addressed. This could prove a detriment to the quality of Business Continuity Management and Emergency Planning procedures.</p>	<p>To comply specifically with the proposed Council's Business Continuity Policy and Strategy Statement, Business Continuity and Emergency Planning should be made a consistent agenda item at Corporate Leadership Team meetings, ensuring developments and issues are reported up the chain of hierarchy.</p> <p>Alternatively, a risk-based approach to reporting to Corporate Leadership Team meetings could be implemented to provide greater value and meaning into senior leaders (on the basis that a standard report may not be the best way to communicate / escalate emerging risks in this area).</p> <p style="text-align: center;"><b>Priority 2</b></p>	<p>Policy &amp; Strategy framework has been authorised, with Agenda item set up for future CLT meetings.</p>	<p>Complete.</p>

Assurance Level

Assurance Level	Definition
<b>Substantial Assurance</b>	There is a sound system of control in place to achieve the service or system objectives. Risks are being managed effectively and any issues identified are minor in nature.
<b>Reasonable Assurance</b>	There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.
<b>Limited Assurance</b>	There are significant control weaknesses which put the service or system objectives at risk. If unresolved these may result in error, abuse, loss or reputational damage and therefore require urgent management attention.
<b>No Assurance</b>	There are major weaknesses in the control environment. The service or system is exposed to the risk of significant error, abuse, loss or reputational damage. Immediate action must be taken by management to resolve the issues identified.

Recommendation ratings

Risk rating	Definition
<b>Priority 1</b>	A high priority finding which indicates a fundamental weakness or failure in control which could lead to service or system objectives not being achieved. The Council is exposed to significant risk and management should address the recommendation urgently.
<b>Priority 2</b>	A medium priority finding which indicates a weakness in control that could lead to service or system objectives not being achieved. Timely management action is required to address the recommendation and mitigate the risk.
<b>Priority 3</b>	A low priority finding which has identified that the efficiency or effectiveness of the control environment could be improved. Management action is suggested to enhance existing controls.