

Causeway Coast and Glens Borough Council

Internal Audit Report Review of Prior Year Recommendations – Business Continuity and Emergency Planning

February 2018
Final

MOORE STEPHENS

Table of Contents

1	Introduction.....	3
1.1	Objectives and Scope.....	3
1.2	Background	3
2	Results of Review.....	4
3	Update on Prior Year Recommendations	5
3.1	Business Continuity and Emergency Planning.....	5
	Appendix I: Hierarchy of Findings	9
	Appendix II: Our Approach and Staff Consulted	10

1 Introduction

This internal audit was completed in accordance with the approved annual Internal Audit Plan for 2017/18.

This report summarises the findings arising from a review of the progress made by CCAG BC in implementing the prior year internal audit recommendations in the area of Business Continuity and Emergency Planning

1.1 Objectives and Scope

The scope of this audit was to review the progress made by Council in implementing prior year internal audit recommendations in the area of Business Continuity and Emergency Planning

The agreed audit objective was therefore to confirm that the internal audit recommendations have been or are being implemented.

1.2 Background

Council is committed to ensuring that key risks are identified and addressed as far as possible, the system of internal control is adequate and operating effectively and the policies and procedures in place are up to date and being followed.

As Internal Audit reports and findings identify possible risk areas, an important part of the internal audit service is to review the progress made in addressing prior year recommendations.

In 2016/17, the following recommendations were made following a scheduled internal audit of the ICT Environment process:

Risk	Number of recommendations			Total
	Priority 1	Priority 2	Priority 3	
The Council may have inadequate Business Continuity and Emergency Plans (and associated Service Unit business continuity plans), leading to inadequate planning and a negative impact on Council's ability to respond effectively to adverse incidents	-	2	-	2
There may be an inadequate governance structure in place within the Council in relation to business continuity and emergency management leading to an uncoordinated approach to the implementation of the Business Continuity and Emergency Plans	-	-	1	1
The Council and Council staff may not be aware of their roles and responsibilities in the event of an emergency or business interruption resulting in the Council being ill-prepared for internal and external incidents and to a longer period of disruption to Council staff and services	-	-	1	1

Testing of the Business Continuity and Emergency Plans may not be carried out on a regular basis and lessons learned from tests may not be implemented, leading to inadequate preparation for implementation of the Plans and potential failure to respond as a result of vulnerabilities in the Plans	-	2	-	2
Total	-	4	2	6

The above recommendations have been revisited as part of this year's internal audit work programme. For each recommendation, we have discussed progress with the relevant officer and reviewed evidence of progress.

2 Results of Review

We reviewed the progress made in implementing the recommendations. The table below notes overall progress against recommendations at the time of our review (February 2018).

Status	Number of Recommendations			Total
	Priority 1	Priority 2	Priority 3	
Issue addressed	-	-	-	-
Issue being addressed	-	4	2	6
Issue not yet addressed	-	-	-	-
No longer a priority issue	-	-	-	-
Total	-	4	2	6

Priority 1 Recommendations

There were no Priority 1 recommendations made.

Priority 2 Recommendations

The table above shows that all of the Priority 2 recommendations are in the process of being addressed.

Priority 3 Recommendations

There were no Priority 1 recommendations made

It is acknowledged that progress has been made since the original internal audit took place and that with the recent appointments in Emergency Planning implementation of the recommendations can now be prioritised and be completed. We recommend that management continue their efforts to address internal audit recommendations and ensure that progress is regularly monitored and reviewed.

3 Update on Prior Year Recommendations

3.1 Business Continuity and Emergency Planning

No	Recommendation	Priority Level	Management Response	Position at February 2018
1	<p>The Council should develop and implement a Business Continuity Plan to ensure that there is clarity as to the procedures to be followed and roles and responsibilities to activate and respond to emergency situations as they arise. Once developed, responsibility for reviewing and updating the Plan should be clarified and a programme of training rolled out to staff and elected members.</p> <p>If appropriate, consideration should be given to following a model business continuity template such as ISO 22301: 2012 that provides a universal framework for organisations to follow, to ensure that business continuity plans are fit for purpose.</p>	2	<p>Agreed. The necessity to develop a Business Continuity Plan for the organisation has been identified in the current business plan 2016-2017 for the Health and Built Environment section. In the continuing absence of a manager identified as responsible for Emergency Planning and Business Continuity, a specific resource will be identified from within the section and tasked to coordinate and prepare a suitable plan. The plan will follow the template as set out in ISO 22301: 2012. Each Head of Service will be responsible for providing information to enable the plan to be populated to ensure that it will be fit for purpose. A copy of the Business Continuity Plan will be presented to the Environmental Services Committee for consideration and Council approval.</p> <p>(Head of Health & Built Environment 31st December 2016)</p>	<p>Audit was advised that a Licensing and Emergency Planning Manager was appointed in October 2017. A Specific resource to co-ordinate Emergency Planning at District Environmental Health Officer Tier was interviewed in February 2018 and a suitable candidate has been offered the position and will begin work in April 2018.</p> <p>Audit was provided with a template which has been prepared as set out in ISO 22301:2012 to allow service level plans to be completed in each section of Council.</p> <p>It will be the responsibility of the newly appointed Emergency Planning officials to coordinate the finalisation of a Business Continuity Plan.</p> <p>Issue being addressed</p>
2	<p>Business continuity plans should be developed at Service level. These should include a business impact analysis to identify areas at greatest risk to interruption to service delivery such as prolonged loss of staff, unavailability of a Council building or increased demand on services. For each of the areas identified, contingency actions currently</p>	2	<p>Agreed. The coordinating officer as identified above will work with Heads of Service to ensure consistency and appropriateness for the specific service unit. The plan will be made available in different formats (electronic and hard copy)</p>	<p>Audit was advised that the coordinating Emergency Planning Officer will work with Heads of service to work through the template Business continuity plan. (see summary position for previous recommendation)</p>

No	Recommendation	Priority Level	Management Response	Position at February 2018
	<p>in place (such as data backed up off site) and further actions to take in the event of an incident occurring (such as redeployment to other locations) should be identified and documented.</p> <p>Once developed, Heads of Service and Service Unit managers should ensure that they can access their plans (eg hard copy, downloaded copy to Council smartphone) in the event that the network or access to Council buildings. As part of this Heads of Service should ensure that out of hours numbers are held for all staff under their control so that a call cascade system can be appropriately implemented in an emergency or disruption to services. Contact details should be periodically checked to ensure that they remain up-to-date.</p>		<p>and contain appropriate out of hours contact details for the service unit. It will be for the Head of Service to identify a specific officer within in each service unit to be allocated the responsibility of ensuring contacts details are held securely, and remain accurate with checks completed on a quarterly basis.</p> <p>(Head of Health & Built Environment 31st November 2016)</p>	<p>Out of hours contact details for Heads of Service has been developed and shared throughout that Tier. Audit reviewed the document (Emergency Out of Hours On Call Information) which had been updated in February 2018.</p> <p>These contact details are reviewed quarterly and are also held on Council Out of Hours Smart Phone. These details are also held in a Locked Cabinet within Councils Multi Agency Emergency Co-ordination Centre located in the Cloonavin (Large Committee Room) and on a secure web-based Emergency Planning Portal; Resilience Direct</p> <p>Issue being addressed</p>
3	<p>Consideration should be given to making Emergency and Business Continuity Planning arrangements an agenda item at SMT meetings on a quarterly basis Alternatively, if appropriate, the Council may wish to establish an Emergency Planning Implementation Group (EPIG) to discuss internal Emergency and Business Planning and emerging issues such as severe weather warnings and to receive updates from group meetings attended by the Chief Executive, Emergency Planning Co-ordinating Officer and other Environmental Health Officers in attendance. If an EPIG is established, terms of reference should be developed to ensure that there is clarity as to the group's role and remit.</p>	3	<p>From September 2016, Emergency planning officers within the Health & Built Environment section will meet on a monthly basis to discuss and review arrangements within council and to consider information from the Northern EPIG. The sub Regional EPCO (shared service) will attend. Notes of these meetings will be recorded. Consideration will be given to the establishment of an internal EPIG, membership and frequency of meetings.</p> <p>There are arrangements already in place to share severe weather warnings with all Heads of service. Emergency Planning Officers have access and permission to circulate to all employees. The information</p>	<p>Audit was advised that officers within Health and Built Environment section meet regularly and review arrangements within the Northern Emergency Preparedness Group</p> <p>A Terms of Reference (ToR) for a Causeway Coast and Glens Borough Council Internal Emergency Planning Implementation Group (EPIG) to discuss emerging issues such as severe weather has been drafted and audit reviewed the draft ToR. It is hoped to hold the first meeting of this group in April 2018.</p> <p>Audit was advised that the existing arrangements to share severe weather warnings continue to occur with all Heads of service copied into weather warnings when</p>

No	Recommendation	Priority Level	Management Response	Position at February 2018
			<p>circulated will be reviewed and where appropriate specific advice given as to actions to be taken.</p> <p>Service area updates will continue to be provided to SMT/Heads of Service quarterly meetings and will specifically include Emergency Planning and Business Continuity Planning matters.</p> <p>(Head of Health & Built Environment (30th September 2016))</p>	<p>received. Emergency Planning Officers also have access and permission to circulate to all employees. The information circulated will be reviewed and where appropriate specific advice given as to actions to be taken for example Storm Ophelia October 2017</p> <p>Issue being addressed</p>
4	<p>Consideration should be given to developing a list of volunteers from within each service area who would be willing to act in event of civil contingency or emergency (identifying home contact details, skills they have and possible roles they could undertake).</p>	3	<p>Arrangements to be agreed as to the response made to requests for additional manpower by outside agencies. This will involve the Head of Operations, Head of Estates and Head of Organisational Development. In addition to contact details being provided by staff of service areas for business continuity purposes, Heads of Service will be asked to collate a volunteer list identifying availability, contact details and any special skills.</p> <p>(Head of Health & Built Environment (31st January 2017))</p>	<p>Council have agreed a number of Emergency Planning Protocols amongst these include a Mutual Aid Protocol with all other Councils in Northern Ireland. (April 2017) and with DAERA with respect to resources Council might considering sharing in the event of a Rabies Outbreak.</p> <p>Audit was advised that now that the appointments of Emergency Planning officials are in place(/identified) there are resources to coordinate an exercise to request Heads of Service to collate a volunteer list identifying availability, contact details and any special skills.</p> <p>Issue being addressed</p>
5	<p>The Council should continue with the training and testing arrangements in relation to emergency planning and develop a schedule of formal emergency management tests to ensure that, in the event that they are activated, they operate as intended. This should include testing in relation to specific roles as outlined in the plan.</p>	2	<p>A formal Emergency Plan and Business Continuity training and testing plan will be prepared. The filling of the post with this specific responsibility will assist in compliance. The testing regime will include all roles identified within the plan. All test exercises will include an evaluation to</p>	<p>Whilst no formal test exercises have been conducted Council have participated in the regional response to Storm Ophelia and will participate in regional debrief March 2018.</p> <p>Council have also reacted to a recent multi-agency fire emergency December 2017 and</p>

No	Recommendation	Priority Level	Management Response	Position at February 2018
	<p>Debriefs should be documented following these testing exercises or where emergency/business continuity plans have been activated to ensure that lessons learned are captured and action taken to implement learning. Consideration should also be given to assigning deadlines for follow-up on learning points identified and a review process should be undertaken to ensure all learning points are actioned.</p> <p>A record of all Council staff taking part in various exercises should also be maintained as evidence of any training</p>		<p>ensure lessons are learned and recommendations for amendment are considered. Attendance records will be maintained for all training exercises. Recording arrangements will be agreed with the Head of Organisational Development.</p> <p>(Head of Health & Built Environment (31st December 2016)</p>	<p>participated in Multi-agency debrief conducted by Emergency Planning Co-ordination Officer and await his report.</p> <p>The new appointments in Emergency Planning will facilitate the preparation of an Emergency Plan and Business Continuity training and testing plan and this activity will be included in the Annual Business Plan for Environmental Services.</p> <p>Issue being addressed</p>
6	<p>The locations of emergency control rooms should be reviewed to determine those that are most appropriate for Council in its new structure. All rooms designated as possible emergency control rooms should be tested to ensure that they will operate as intended in the event of an emergency (eg ICT, access).</p>	2	<p>The location of Emergency Planning Control Rooms will be reviewed on agreement of the organisations estate strategy. The control room within Cloonavin will remain the Director of Performance office. An audit of that offices capability will be conducted to ensure it is fit for purpose by October 2016. The capability will be replicated in the other designated Emergency Planning Rooms as agreed by SMT. A proposal will be put forward by the Head of Health & Built Environment to SMT by October 2016.</p> <p>(Head of Health & Built Environment (31st December 2016)</p>	<p>We were advised that a multi-agency Emergency Control room has been identified as part of sub regional Multi agency emergency planning.</p> <p>This is located within the Cloonavin Civic headquarters (Large Committee Room).</p> <p>A funding request has been submitted to the Office of First and Deputy First Minister for resources to fully equip this room.</p> <p>The location of a back-up control room is under consideration; it may be in Riada House.</p> <p>Issue being addressed</p>

Appendix I: Hierarchy of Findings

This audit report records only the main findings. As a guide to management we have included the categories of recommendations that were applicable at the time of the prior year audits (note: these were revised in 2016 following guidance from the DFP):

Priority 1: Major issues which require urgent attention and the implementation of agreed audit recommendations in the short term.

Priority 2: Important issues which require immediate attention and the implementation of agreed audit recommendations in the short to medium term.

Priority 3: Detailed issues of a less important nature which require attention and the implementation of agreed audit recommendations in the medium to long term.

Appendix II: Our Approach and Staff Consulted

Our audit fieldwork comprised:

- Reviewing progress against recommendations via discussions with key staff
- Examining relevant documentation
- Testing controls and accuracy of records.

The table below shows those consulted with and we would like to thank them for their assistance and co-operation.

Job title
Head of Health & Built Environment