



Business Continuity Policy

Primary Care Doncaster Document Control	
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Author Job Title	Corporate Governance Officer
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Purpose

Business Continuity is the capability of the organisation to continue to deliver services at predefined levels following a disruptive incident. The purpose of Primary Care Doncaster's Business Continuity Management Policy document is to ensure that Primary Care Doncaster Limited is committed to:

Business Continuity Management and Planning, including but not limited to

1. Updating the Business Continuity Forward Planner by way of formulating a Business Continuity plan which allows the organisation to understand how the critical activities will be managed and maintained in the event of a specific type of incident.
2. Formulating and reviewing the Primary Care Doncaster Business Continuity Plan Identifying key services and the critical activities and resources required to deliver these.
3. Enabling an Annual Business Continuity Exercise which tests, identifies and supports the overall practical management planning, identifying further risks prompting operational revision for best practice to manage the risks to the performance of critical activities and resources.
4. Maintaining the Primary Care Doncaster Communications Strategy and its associated Emergency Contact lists.

Business Continuity Management is a holistic management process that identifies potential threats to an organisation and what impacts to business operations those threats, if realised, might cause. Such knowledge and information provides a framework for building organisational resilience with the capability of an effective response that safeguards the interest of its key stakeholders, reputation, and brand and value activities.

The Business Continuity Plan objectives

- Serves as a guide for Primary Care Doncaster recovery teams.
- References and points to the location of critical data.
- Provides procedures and resources needed to assist in recovery.
- Identifies those who must be notified in the event of a disaster.
- Assists in avoiding confusion experienced during a crisis by documenting, testing and reviewing recovery procedures.
- Identifies sources for supplies, resources and locations.
- Documents storage and retrieval procedures for vital records.
 - These objectives will be achieved by: -
- Clearly defining the roles, responsibilities and reporting lines within the organisation
- Including business continuity issues when writing reports and considering decisions
- Maintaining a comprehensive risk register of business-critical documents (clinical and non-clinical) and reviewing the same on a periodical basis
- Ensuring controls are in place, effective to mitigate the risks around the critical activities and resources, and understood by those expected to apply them
- Ensuring gaps in control are rectified and assurances are reviewed and acted on in a timely manner
- Maintaining documented procedures for business continuity and provision of suitable information, training and supervision

- Preparing contingency plans to secure business continuity where there is a potential for an event to have a major impact on the organisations ability to function
- Monitoring all arrangements continually and seeking continuous improvement at all responsibility levels

Assumptions

- Where Primary Care Doncaster engages or sub-contracts with a third party to deliver services, it will gain assurance that business continuity systems, processes and policies are in place and that the third party will enact them in the event that they are needed. The onus for the version control and review updates of those policies is held by the providing host.
- Key people (team leaders or alternates) will be available following a disaster.
- This document and all vital records are stored in a secure off-site location and will not only survive the disaster but are accessible immediately following the disaster.
- Risks in relation to critical assets are reported to the Board and recommendations for mitigations are implemented.

Scope

This policy applies to all areas and activities of the organisation identified as being critical to the ability of the business to continue to operate. Risk scores are marked within the Corporate Governance Committee annually and monitored within the information governance group, and at the board to ensure they are representative of a majority agreement.

The following should be considered in conjunction with this policy:

- Information Governance Policy
- Information Governance Code of Conduct
- Records Management Policy
- Learning & Development Policy
- Primary Care Doncaster's Performance and Assurance Framework
- Primary Care Doncaster's Business Continuity Plan

Risk Management

Primary Care Doncaster is committed to ensuring that systems and processes are in place, and regularly reviewed, to minimise risks to our patients, staff, visitors, partner organisations and commissioners of healthcare. We acknowledge that the provision of healthcare can never be totally risk free but that every effort should be made to minimise or eradicate risks as far as is reasonably practicable, our risk strategy includes:

- Compliance with all local and national targets routine risk assessments after incidents and before introducing a new service using consistent risk methodology
- Urgent risk assessments when new guidance is published, a change to the service is requested by the commissioner, or an audit indicates a change is necessary
- Regular audit of clinical management issues, including monitoring rates of patient non-attendance (DNAs), services utilised, referral patterns and clinician time spent per patient

- Ad-hoc clinical audits when practice changes, new guidance is published or as indicated when monitoring suggests this is necessary
- Constant focus and auditing of Information Governance (IG) processes, as per our Information Governance Group Agendas, IG forward planner, IG Policies and IG Procedures and the requirements of the annual Data Security Protection Toolkit (DPST), the Data Protection Act 2018 (DPA) and General Data Protection Regulations (GDPR).

LIKELIHOOD

The Primary Care Doncaster's Performance and Assurance Framework includes all risks that have been identified to the organisation's activities and achievement of its strategic objectives. This is monitored by the Corporate Governance Committee (CGC), which reports to the Board of Directors. Each risk on the Performance and Assurance Framework has an identified Risk Owner and Risk Manager. Review schedules are detailed in the Performance and Assurance Framework. Any material changes to the risk register are escalated to the Board of Directors.

Lessons learned

A culture of continuous learning and improvement is integral to Primary Care Doncaster's aims as an organisation. Upon undertaking new contracts, activities, services, processes, individuals should review the successes and pitfalls and proactively review lessons learned, to help avoid making the same errors and continuously improve on quality of delivery.

These are recorded, reported and shared, noted and discussed in team meetings, to promote an open and sharing improvement culture in line with full duty of Candour.

For any issues that are recorded as official incidents, there is a Significant Events Register which is housed within the CGC agenda as a standing item. For formal complaints, a Complaints Register is used to log a timeline of events and report on patient feedback and key outcomes, evidencing the practice of lessons learned throughout the organisation.

Business Continuity Plan (BCP)

A BCP will be produced for those areas listed within the scope of this policy. A BCP is defined as documented procedures that guide organisations to respond, recover, resume and restore to a pre-defined level of operation following disruption. Typically, this covers resources, services and activities required to ensure the continuity of business-critical business functions.

The BCP will be based on the following processes:

- Critical Function Analysis– this is defined as a process of analysing activities and the effect that a business disruption might have on them.
- Risk Assessments – this is defined as an overall process of risk identification, risk analysis and risk evaluation.
- Identification of Prioritised Activities and Continuity Requirements. Prioritised Activities are defined as activities to which priority must be given following an incident in order to mitigate impacts.
- Annual BCP/BCI testing event.

Business Continuity Incident (BCI)

In this context, a BCI is defined as a situation that might be, or could lead to, disruption, loss, emergency or crisis.

The Business Continuity Plan provides a Standard Operating Procedure (SOP) for the following priority incidents as a minimum. The potential impact of incidents will be assessed through appropriate risk analysis:

- Unavailability of premises for a period that significantly impacts prioritised activities cause by fire, flood or other incidents
- Significant numbers of staff prevented from reaching premises where prioritised activities are held, or getting home, due to severe weather or transport issues.
- Major electronic attacks or severe disruption to the IT network, systems and mobile telephony
- Terrorist attack or threat affecting transport networks or office locations
- Denial of access to key resources, assets, utilities and fuel supply
- Theft or criminal damage severely compromising the organisations physical assets
- Significant chemical contamination of the working environment
- Serious injury to, or death of, staff whilst in offices
- Illness/epidemic striking the population and affecting a significant number of staff
- Outbreak of serious disease or illness in the working environment
- Simultaneous resignation or loss of a number of key staff
- Widespread industrial action
- Significant fraud, sabotage or other malicious acts
- Violent incidents affecting staff.

Incident Response Structure

Response to an incident will be defined within the Business Continuity Plan (BCP) and resourced to ensure procedures facilitate response and recovery from an incident. This should include the following:

- Incident Reporting and Management System – the BCP is to detail procedures for incident reporting and management to facilitate effective command and control
- Incident analysis, management and recovery – Business continuity leads will support and provide guidance to the designated Incident Response Team, as detailed in the BCP.
- Command Centre – Facilities are to be identified to enable effective management of an incident. The Incident Response Team will co-ordinate operations from the designated location. All staff will receive the Business Continuity Policy and Plan via TeamNet.
- Participation in the BCI/BCP annual testing will form part of staff statutory/mandatory training.

Communication of Strategy

Effective communication is essential at a time of crisis. Primary Care Doncaster's has a communication strategy that is board approved. This forms Appendix 1 of this policy. It outlines ways in which the business continuity plan shall be communicated during an event or incident.

Exercising, maintaining, and reviewing Business Continuity Management

The Business Continuity Policy, Plan and Communications Strategy will be reviewed annually or in line with the Primary Care Doncaster's Performance and Assurance Framework or the outcomes from the BCP testing event/exercise to determine whether any changes are required to procedures or responsibilities.

Distribution and Implementation

This document will be made available to all staff via TeamNet. Policy reviews are monitored within the Primary Care Doncaster P:Drive Policy Library. Hard copies of the following documents will be made available for the Health Van. All of the Primary Care Doncaster Policies can be provided in alternative formats upon request.

- ✓ Business Continuity Plan
- ✓ Business Continuity Policy
- ✓ Business Continuity Communications Strategy

Training

All members of the Primary Care Doncaster's Corporate Team will undergo a Business Continuity Exercise within 6/12 months based on a variety of scenarios detailed within this policy.

Roles & Responsibilities

Chief Executive Officer (CEO)

The CEO is the Accountable Officer with overall responsibility for Business Continuity Management (BCM). As such the CEO must take assurance from the systems and processes for BCM and the underlying BCP that they are adequate to fulfil the requirements.

Head of Corporate Services

The Head of Corporate Services is Primary Care Doncaster's SIRO (Senior Risk Information Officer) overseeing all the associated information governance.

Corporate Governance Officer

The Corporate Governance Officer is the Business Continuity Nominated Lead, who will support the CEO in policy development, systems and process recording, reporting and testing.

Corporate Governance Committee

The Primary Care Doncaster Corporate Governance Committee is the responsible collective group assigned to monitor, score, record and approve Primary Care Doncaster's Performance and Assurance Framework. Feeding the data directly into the Board of Directors.

All of the aforementioned groups are responsible for

- Collaborating, planning and developing systems and processes and test exercises, including but not limited to the maintenance and review of any relevant Business Impact Analysis.
- The management and recovery of relevant business continuity incidents under the command and control of the nominated Incident Response Team.

The incident response team is made up of the Senior Leadership Team.

All managers and staff must:

- Develop an awareness of the Business Continuity Policy and Plan
- Understand their role in reporting in accordance with the Business Continuity Plan for any Business Continuity Incident
- Understand and contribute to Business Continuity Incident management and planning and recovery plans within their area of responsibility, including the specific roles and responsibilities allocated to their respective team members.

Supporting Documents

1. [Business continuity Plan](#)
2. [Appendix 1 Business Continuity Incident Communications Strategy](#)
3. Primary Care Doncaster's Performance and Assurance Framework - available upon request.