group policies and procedures

# emergency business continuity plan

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| Category | Corporate Governance |
| Author | Castleman Healthcare Ltd |
| Responsible Director | Dr Dominic Hennessy |
| Date of issue | September 2016 |
| Next review date | September 2025 |
| Document ref & version | Emergency Business Continuity Plan V2 |

**Related policies and guidance**

**Document revision and approval history**

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| Version | Date | Author | Approved by | Comments |
| Final | Sep 2016 |  |  |  |
|  | Aug 2019 | JL |  | Reviewed |
|  | Sep 2021 |  |  | Updated response plan, roles and responsibilities. Addition of CEO and Director of Programmes |
| V2 | Aug 2023 | JL |  | Reviewed – Bank AC Access & Instant Response Plan added |
|  | Aug 2023 |  | FP, CH, DH, FP |  |
| V2 | Sep 2023 |  |  | Revisions made as advised by FC |

# AIM

Castleman Healthcare Ltd is a not-for-profit company in Poole North and East Dorset which is owned by 13 GP practices and as such certain areas of business continuity and governance are joined for support and maximum efficiency.

The purpose of this document is to provide useful information to aid the smooth running of the local team at a time of business interruption. This document links with other GP practices Business Continuity plans.

In the event of an emergency or business continuity event, the Company will endeavour to maintain services as usual by drawing on resources and support from across the group.

However, in exceptional circumstances, the Business Recovery Team may need to convene to activate the Business Continuity Plan and to prioritise which services will need to be re-sited and which services will need to be reduced or temporarily stopped.

These circumstances are referred to in this document as Business Continuity Events.

A copy, or e-copy of the document, together with the Group Insurance Policy and other essential documents, referred to in the Appendices, must be readily accessible at all times by members of the Business Recovery Team.

The contents of this Plan will be brought to the attention of existing staff and to new staff joining Castleman Healthcare Ltd.

# Precursors

The following activities need to take place to ensure that the Plan can be fully effective: -

1. The physical needs of any specific site are established and reviewed annually in line with the Plan (i.e. Essential Supplies/Equipment/ Documents)
2. Insurers informed of the Business Continuity Plan and adequate insurance cover maintained to establish recovery.
3. Emergency e-communication and computer requirements established and tested – see Appendix 1.
4. Off-site access to key data and documents established and tested annually.
5. Bank account access by the right people.

# Review Arrangements, Training and Testing

The plan will be reviewed and updated annually and tested bi-annually. Training needs will be identified during tests and these needs will be prioritised and addressed accordingly.

# The Business Recovery Team

The Business Recovery Team (depending on the extent of the event) will consist of:

1. Castleman CEO
2. Chair/Director of Governance
3. Vice Chair
4. Finance Director
5. HR Director
6. Director of Operations

**Roles and responsibilities of the Business Recovery Team**

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| Castleman CEO | Responsible for holding a readily accessible electronic copy of the plan.  Contributing to the plan content.  Responsible for preparing the initial draft of the plan, reviewing and the plan annually  Advising the HR Director of changes to personal circumstances to allow the plan to be updated.  Initiating response/recovery action as necessary.  Ensuring other stakeholders are communicated with appropriately.  Liaising with the press/media if appropriate. |
| Chair/Director of Governance | Responsible for reviewing the plan annually.  Responsible for testing the plan bi-annually. Responsible for holding a readily accessible electronic copy of the plan.  Contributing to the plan content.  Initiating response/recovery action as necessary. |
| Director of Operations | Informing the Board of any changes to the plan as they occur (e.g. in key personnel).  Responsible for holding a readily accessible electronic copy of the plan.  Ensuring that the patients receive up to date information regarding the situation by the designated means.  Maintain buildings folders.  Liaising with NHSD and other authorities. Supporting response / recovery action as necessary. |

# Plan Activation

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| Executive Assistant | Responsible for holding a readily accessible electronic copy of the plan.  Contributing to the plan content.  Familiarising themselves with the content of the plan.  Advising the HR Director of changes to personal circumstances to allow the plan to be updated.  Lead on dealing with patient enquiries and informing other health service personnel as directed. |
| HR Director | Responsible for holding a readily accessible electronic copy of the plan.  Contributing to the plan content.  Familiarising themselves with the content of the plan.  Lead on informing/updating staff on business continuity events.  Responsible for arranging bi-annual Business Continuity training for the Business Recovery Team.  Responsible for ensuring that emergency contacts for staff are maintained. |
| Finance Director | Responsible for holding a readily accessible electronic copy of the plan.  Contributing to the plan content.  Familiarising themselves with the content of the plan.  Consider financial implications of any business continuity events.  Advising the HR Director of changes to personal circumstances to allow the plan to be updated. |
| Director of Operations | Responsible for holding a readily accessible electronic copy of the plan.  Contributing to the plan content.  Familiarising themselves with the content of the plan.  Support the CEO with response and recovery action as necessary.  Communicate changes to service provision with the HR Director.  Advising the HR Director of changes to personal circumstances to allow the plan to be updated.  Ensuring that the patients receive up to date information regarding the situation by the designated means.  Maintain buildings folders.  Liaising with the CCG and other authorities. Supporting response / recovery action as necessary. |

The Plan will be activated by the CEO or in their absence by the Chair. In the absence of both, the HR Director will activate the Plan.

1. CEO – Fiona Cleary – 07743 858372
2. Chair – Dr Dominic Hennessy – 01202 865800
3. HR Director – James Leyland – 01202 772540

# Communication

In the event that business interruption is so severe that alternative arrangements for the provision of care need to be communicated to any patients being looked after by a service provided by Castleman Healthcare Ltd, this will be done via the relevant Practice. The Group aims to reassure patients with regular progress reports of when normal service will resume.

In the event that support from the Board is required in publicising the alternative arrangements, the Corporate Governance Director will contact the NHS Dorset at the earliest possible opportunity to allow as much time as possible to achieve widespread communication with patients. Castleman Healthcare Ltd will consider sharing the plan on its website should it be felt that this will help to mitigate the effects of business interruption. Likewise, staff, suppliers and other interested parties will be informed and receive regular updates.

If a business continuity event is experienced, staff should not contact the media or make any comment in response to specific questions. All enquiries should be referred to the nominated partner or Operations Manager who may decide to issue a basic and standard statement to prevent any misunderstanding.

# The Business Continuity Plan

Whilst not prescriptive or exclusive, this plan outlines the business continuity strategies adopted by Castleman Healthcare Ltd to address exceptional circumstances, for example:

1. Loss of one of the main premises that Castleman Healthcare Ltd operates from.
2. Loss of telecommunications.
3. Loss of electricity supply.
4. Loss of gas supply.
5. Loss of water supply.
6. Fire.
7. Flood.
8. Failure of IT System.
9. Loss of medical records.
10. Disruption to medical supplies.
11. Staff shortage.
12. Epidemic/Pandemic.
13. Major Incident (Accident/Terrorism).
14. Loss of access / fraudulent activity to the bank accounts.

# Loss of one of the main premises delivering services

If any of the buildings have to be evacuated during working hours, Partners and staff who are at work, together with patients and visitors, should be evacuated in line with fire procedures from the given

premises. The following actions should be considered, although the extent of action will depend upon the reason for evacuation and the resulting outcome:-

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| Evacuation of building if in working hours. | Staff to take personal belongings. |
| Business mobile phones to be removed from the premises. |
| Police/Fire Service to be informed if appropriate. | Executive Assistant |
| Telephone system to be set to the evacuation message. | Practice/Office Reception Manager |
| Remove controlled drugs from site | Clinicians on site |
| Access to the site to be closed, buildings secured and notices placed on doors. | Lead clinician on site |
|  |  |
| Utility services to be informed if appropriate. | Executive Assistant |
| Ring NHS Dorset and speak to a senior staff member. | Chair/Director of Governance |
| A Director or designated employee is to remain close to the site if appropriate to guide and deal with emergency vehicles using their personal mobile phone. | Lead clinician on site |
| Chair/Corporate Governance Director will liaise with the emergency services to conduct an immediate assessment of the situation to determine the extent and likely duration of the emergency. A decision will then be taken as to the necessary emergency steps and for staff to be informed. | Chair |
| The Director of Operations will liaise with the practice insurers and other agencies to ensure that a swift and correct recovery is supported and achieved; including contact with the possible sources of alternative accommodation. | Director of Operations |
| Once the Command Centre has been established at the nearest alternative surgery, patients and staff due to attend/work later that day to be informed. The following should be advised of the emergency, if not previously informed:  The emergency services. The Out of Hours service. NHS Dorset.  IT Services Team. SystmOne. Staff not involved in the initial incident. All local surgeries. All local hospitals, All local pharmacies  Local nursing homes. Our insurers.  The phone number of the Command Centre should also be circulated at this time. |  |

If any of the practice buildings becomes unavailable for use, it may be necessary to find alternative accommodation. Depending on the reason for evacuation and the anticipated duration, the Business Recovery Team will need to decide whether to establish a Command Centre at one of the other practice surgeries or at an alternative venue. This will then remain in operation until such time as the original building is reopened or temporary accommodation is set up and operational.

# Loss of telecommunications

Castleman Healthcare Ltd has various suppliers of telephone lines, systems and mobiles and is dependent on the individual premises and employee.

In the event of a telephone failure, checks will take place in the following order and the appropriate supplier contacted for assistance, by mobile phone if necessary:-

1. Individual handset – replace equipment

2. Line check

3. System check

4. Electrical check

If the fault is extensive and telephones are likely to be unavailable for a prolonged period, it may prove necessary to divert incoming calls, in the first instance, to an alternative surgery and transfer staff over to handle demand. However, the destination will depend upon which telephones are not working.

# Loss of Electrical Supply

In the event of an electrical power failure, the extent of the power failure will need to be established. Is it restricted to a single building, locality or region? Contact supplier to establish anticipated length of power failure. A decision should be made as to whether the surgery business can be continued safely, or if relocation to an alternative site will be required to maintain business.

Contact the Board to inform them that you have a power failure affecting any delivery of healthcare services and what business continuity measures you are putting in place to maintain service.

The systems and appliances that will be affected during a power failure are:

1. Lighting.
2. IT System.
3. Telephones Heating Refrigerators.
4. Clinical refrigerators – If failure is for a significant period, this could be detrimental to the contents of clinical refrigerators. The contents will need to be assessed and any temperature-critical drugs will be relocated to an alternative site, within the Group, if possible, to ensure that optimum temperature is maintained.
5. Heating – If heating is lost, the effect of the loss of heating relating to the time of year and ambient temperature will need to be assessed. If it is felt that the practice’s business will be

affected by loss of heating, then portable appliances or alternative accommodation may be sought.

1. Computers – During a mains electrical failure, computers are to be switched off to protect them from power surge when power is restored.
2. Diagnostic Equipment – If such equipment does not have internal rechargeable batteries, consider the implications of not having the equipment available. If equipment does have internal re-chargeable batteries, ensure that you are aware of how long the equipment can be used.

# Loss of gas supply

In the event of a gas leak, shut off the supply at the meter. Open all windows and doors, evacuate the building and report the leak to the gas supplier.

# Loss of water supply

In the event that water supply fails, the GP practice will contact the supplier and consider the potential impact on the practice in terms of:-

1. Toilets – these may need to be deemed out of order. Alternative facilities will need to be considered.
2. Drinking Water and Hand Hygiene – bottled water can be purchased from nearby supermarket. Further hand gel may need to be sourced.

# Fire

In the event of a fire, buildings will be evacuated following Fire evacuation procedures. The extent of damage will need to be assessed and a decision made as to whether the Business Continuity Plan will need to be activated.

# Flood

In the event of a flood, it is essential to establish the source of the water to stop or reduce the ingress if possible. An assessment of the damage will then need to be made and action to be taken will need to be discussed and agreed.

# Failure of IT System

To minimise the effects of failure of an IT System, electronic data stored by Castleman Healthcare Ltd is replicated between sites, with data backup taking place using the NHS Dorset shared drive. Castleman Healthcare Ltd does not store confidential information of patients. If a server at one particular site fails, then the other server would handle logins for users in the unaffected sites. In addition to our in-house IT specialist, Castleman Healthcare Ltd is supported by the contracts held by each member practice.

If the practice experiences loss of either a computer or software through theft or damage, the practice should inform its insurers and consult with its IT advisers who will assist in providing replacement equipment.

Computer servers are susceptible to failure during periods of extreme heat. The temperature of server rooms should be monitored to ensure that overheating should not occur.

# Loss of Medical Records

If medical records are lost or damaged, these may be constructed using the data held on the computer system.

# Disruption to Medical Supplies

During a major emergency, there may be interruptions in the supply of consumables and equipment required by the practice. This may be related to an incident such as a supplier factory fire, or disruption to the transport network caused by a fuel crisis.

In such an event, the Director of Operations will be responsible for assessing the impact on the business and in liaising across the Group or locality to secure assistance.

# Staff Shortage

The monitoring of staff absence will be routinely conducted by the HR Director to ensure that sufficient staffing levels, roles and experience are maintained. However, there may be times, such as in an influenza/covid pandemic situation, where levels fall below that required to provide a full service and where locum/relief staff may be difficult to source. In this situation, a business continuity event may be declared and services may need to be reviewed and prioritised to match safe staffing levels.

# Epidemic/Pandemic

In the event of an official alert the CEO will liaise with the Emergency Planning Officer at NHS Dorset to ensure that practices conform and co-operate with the joint efforts being made across the region to respond appropriately to the emergency. Routine appointments may need to be reduced and hygiene measures increased depending on the infection.

# Major Incident (Accident / Terrorism)

In the event of a major incident the Chair will liaise with NHS Dorset to ensure that Castleman conforms and co-operates with the joint efforts being made across the region to respond to the emergency. The HR Director, or a nominated person, will secure immediate delivery of extra clinical supplies to include masks, gloves, gowns, vaccines as appropriate.

The HR Director will arrange for the cancellation of all routine appointments and clinics and arrange, if appropriate, for the OOH service to provide immediate cover. Consideration will also be given to securing additional locum cover to increase surgery capacity.

The Directors will collectively be responsible for implementing this plan in the event of a business continuity incident.

# LOSS OF ACCESS TO BANK ACCOUNT / FRAUD

In instances of Loss of Access to the Company Bank Account, the Director of Finance and Chair will be notified immediately and will escalate this to the bank via either an emergency contact number or through the bank’s main switchboard.

The Director of Finance will ensure the safety of the accounts, instigating the Castleman Fraud policy if required.

The Director of Finance will liaise with those affected by the loss of access, giving regular updates.

In instances where fraud is suspected, or fraud has taken place the Castleman Fraud policy will be instigated immediately.

# References

1. GP template Business Continuity Planning [www.systems.hscic.gov.uk](http://www.systems.hscic.gov.uk)
2. General Practice Emergency Business Continuity Plan template www.glasgow lmc.co.uk
3. The Route Map to Business Continuity Management (2012) BSI Centre for the Protection of National Infrastructure <http://www.cpni.gov.uk/about/>
4. Business Continuity Management Toolkit <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/137994/Business_Continuity_Managment_Toolkit.pdf>
5. Castleman Fraud Policy <https://www.castlemanhealthcare.co.uk/_files/ugd/b9b3ac_ecefc66549a74d5c8fbcecbeb65b16df.docx?dn=Fraud%20Policy%20Jul%2023.docx>

# Appendix 1 – EMERGENCY E-COMMUNICATION & COMPUTING REQUIREMENTS

**Insurers**

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| MIAB – insurance | Tracey Deville, MIAB, Business & Technology Centre, Bessemer Drive, Stevenage, Hertfordshire, SG1 2DX  [tracey.deville@miab.co.uk](mailto:tracey.deville@miab.co.uk) |

**IT**

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| IT Support Hardware | Defer to Host Site for in-house IT support |

# Appendix 2 - Emergency Response Checklist

This page should be used as a checklist during the emergency

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| **Actions within 24 hours:** | **Completed (date, time, by)** |
| Start of log of actions and expenses undertaken |  |
| Liaise with emergency services |  |
| Identify and quantify any damage to the organisation, including staff, premises, equipment, data, records, etc |  |
| Identify which critical activities have been disrupted |  |
| Convene those responsible for recovering identified critical functions, and decide upon the actions to be taken, and in what timeframes |  |

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| **Daily actions during the recovery process:** |  |
| Convene those responsible for recovery to understand progress made, obstacles encountered, and decide continuing recovery process. |  |
| Continue to provide staff and customers with information to maintain the reputation of the business and keep relevant authorities informed. |  |
| **Post incident** |  |
| Arrange a debrief of all staff and identify any additional staff welfare needs (e.g. counselling) or rewards |  |
| Use information gained from the debrief to review and update this Business Continuity Plan and to arrange required training |  |

# appendix 3 – Actions and Expenses Log

It is essential that the Company continues to keep accurate financial records of any expenses incurred in the recovery process. This log may be required to support an insurance claim and to provide information for the post-recovery debrief.

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| --- | --- | --- | --- |
| **Date/time** | **Decision/action taken** | **By whom** | **Costs incurred** |
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