



# Business Continuity Planning Review Final Assignment Report 2022/23

Cheshire Fire and Rescue Service

Report Ref: 302CFRS\_2223\_004

Date of Issue: September 2022

A large, solid teal curved shape is visible in the bottom left corner of the page.

# Contents

- 1 Executive Summary
- 2 Engagement Objectives and Scope
- 3 Detailed Findings and Recommendations

## Appendix A: Assurance Definitions and Risk Classifications

### Limitations

The matters raised in this report are only those which came to our attention during our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required. Whilst every care has been taken to ensure that the information in this report is as accurate as possible, based on the information provided and documentation reviewed, no complete guarantee or warranty can be given with regards to the advice and information contained herein. Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

Responsibility for a sound system of internal controls and the prevention and detection of fraud and other irregularities rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify all circumstances of fraud or irregularity. Effective and timely implementation of our recommendations by management is important for the maintenance of a reliable internal control system.

Reports prepared by MIAA are prepared for your sole use and no responsibility is taken by MIAA or the auditors to any director or officer in their individual capacity. No responsibility to any third party is accepted as the report has not been prepared for, and is not intended for, any other purpose and a person who is not a party to the agreement for the provision of Internal Audit and shall not have any rights under the Contracts (Rights of Third Parties) Act 1999.

### Public Sector Internal Audit Standards

Our work was completed in accordance with Public Sector Internal Audit Standards.

## Report Distribution

Name	Title
Mark Cashin	Chief Fire Officer
Alex Waller	Deputy Chief Fire Officer
Paul Binyon	Assistant Chief Fire Officer
Andrew Leadbetter	Director of Commissioning and Governance
Steve Barnes	Head of Operational Policy & Assurance
Tony O'Dwyer	Group Manager - Operational Policy & Assurance
Ged Basson	Senior Operations Manager – North West Fire Control
Tam Blair	Station Manager - Operational Policy & Planning
Paul Vaughan	Treasurer
Chris Astall	Planning, Performance and Risk Officer
Louise Willis	Planning, Performance and Risk Manager

## Audit Team

Name	Contact Details	
Andrew McKenzie	<a href="mailto:Andrew.mckenzie@miaa.nhs.uk">Andrew.mckenzie@miaa.nhs.uk</a>	07584190721
Anne-Marie Harrop	Anne-Marie.harrop@miaa.nhs.uk	07920150313

## Acknowledgement and Further Information

MIAA would like to thank all staff for their co-operation and assistance in completing this review. This report has been prepared as commissioned by the organisation and is for your sole use. If you have any queries regarding this review, please contact the Audit Manager. To discuss any other issues then please contact the Director. MIAA would be grateful if you could complete a short survey using the link below to provide us with valuable feedback to support us in continuing to provide the best service to you.

[https://www.surveymonkey.com/r/MIAA\\_Client\\_Feedback\\_Survey](https://www.surveymonkey.com/r/MIAA_Client_Feedback_Survey)

# 1 Executive Summary

## 1.1 Objective

The overall objective of this review was to provide assurance that Cheshire Fire and Rescue Service (CFRS) has developed and implemented robust Business Continuity Planning (BCP) arrangements. The review also covered arrangements in place for Northwest Fire Control and an evaluation of the assurance reporting arrangements for BCP within Northwest Fire Control (NWFC).

## 1.2 Opinion

<b>Substantial Assurance</b>	There is a good system of internal control designed to meet the system objectives, and that controls are generally being applied consistently.
------------------------------	--

## 1.3 Key Findings

The following provides a summary of the key themes.

Sub Objective	Key Themes
<p>Overarching Strategy in place for Business Continuity planning which sets out roles and responsibilities.</p> <p>A Business Continuity Plan in place that sets out how it will plan for, respond to and recover from a significant incident or loss of services. The response plan has been approved, is up to date and reviewed on a regular basis.</p>	<p>Areas of good practice:</p> <ul style="list-style-type: none"> <li>• The current CFRS Business Continuity Management (BCM) Policy (updated August 2020 and due for review August 2022) details how CFRS will discharge its statutory duties under the Civil Contingencies Act 2004 and align to BS25999-1 (Business Continuity Management), BS25999-2 (Business Continuity Self-Assessment).</li> <li>• The CFRS Business Continuity Guidance and Protocol Document also provides a framework and advice for managers across all departments and functions within CFRS for developing Business Continuity Management (BCM) arrangements and plans within their own areas of work. Roles and responsibilities are clearly documented.</li> <li>• A Crisis Management Plan (CMP) which has most recently been updated March 2022, provides the framework for improving the organisations resilience to emergencies or crisis interruptions,</li> </ul>

Sub Objective	Key Themes
	<p>facilitating the recovery of key business processes and safeguarding the delivery of vital services.</p> <ul style="list-style-type: none"> <li>• The CMP is monitored and reviewed by the Operational Support and Risk Manager on a six-monthly basis and Risk Management Board review the CMP annually.</li> <li>• The BCM policy is also supported by the CFRS Risk Management Policy (due for review March 2023).</li> <li>• In terms of North West Fire Control (NWFC) the overarching service level agreement between CFRS and other fire services remains in development, however business continuity plans for NWFC are shared and communications and assurances are provided via quarterly performance reports produced by NWFC.</li> <li>• CFRS have standard templates for business continuity plans which include loss of staff, decision and communication milestones, contact details and any stakeholder contacts.</li> </ul> <p>Areas requiring improvement</p> <ul style="list-style-type: none"> <li>• The current policy requires non-confidential aspects of the Business Continuity (BC) plan are published on the CFRS intranet, MIAA review of the CFRS website highlighted the BC plan is not currently available. MIAA recommends non confidential details are published on the website and intranet, – <b>Low risk recommendation 3.</b></li> </ul>
<p>A formal risk assessment exists for each provided service that directly takes Business Continuity Planning into consideration.</p>	<p>Areas of good practice:</p> <ul style="list-style-type: none"> <li>• MIAA review highlighted evidence of annual review of overall CFRS Crisis Management Plan (CMP) is undertaken. The current plan was updated in March 2022.</li> <li>• All plans are supported by risk assessments which are undertaken using the CFRS risk management</li> </ul>

Sub Objective	Key Themes
	<p>framework. The risk assessments include details of recovery time objectives as part of the risk analysis. The templates ensure that there is appropriate consideration of risks to loss of staff, service and the business impact internally and externally.</p>
<p>Business Continuity Plans are in place which are reviewed, tested, and updated on a regular basis.</p> <p>There are appropriate Business Continuity arrangements in place for all sites.</p>	<p>Areas of good practice</p> <ul style="list-style-type: none"> <li>• MIAA considered evidence detailing arrangements specifically in place for a potential loss of Information Technology (IT) services (last reviewed 25<sup>th</sup> March 2022) and arrangements relating to Legal Services (last reviewed 1<sup>st</sup> July 2022). The service conducts internal exercise and incidents to test out contingency arrangements and risk management.</li> <li>• Business Continuity Plans (BCPs) for all Joint Corporate Services teams have been reviewed in 2021/22 and a schedule of review and testing has been approved for 2022-23.                      MIAA review of current Business Continuity Management documents – NWFC BIA Covid, NW7105 and NW 7016 (BCP - reviewed 20<sup>th</sup> February 2022) for NWFC highlighted measures in place for significant events. The BCP’s provided by NWFC are reviewed by one of the four services involved in NWFC. CFRS will be auditing NWFC BC plans during 2022, for example CFRS are in the process of reviewing NWFCs Industrial Action plans as part of preparedness for potential industrial action.</li> <li>• MIAA review of CFRS department BCP’s for a sample of departments (Fleet services and Corporate Communication &amp; Engagement) highlighted up to date and appropriately approved BCP’s in place. BCP’s detail various performance measures including recovery time objectives for critical activities.</li> </ul> <p>Areas requiring improvement</p>

Sub Objective	Key Themes
	<ul style="list-style-type: none"> <li>• MIAA review of BC planning exercises highlighted a structured rolling programme of tabletop exercises (to be used to test each departmental plan over a three-year cycle) is in development. This was highlighted in our 2017/18 Business continuity review and has been developed for Joint Corporate Services. An overarching document to record the test and outcome of each BCP should be developed and assurances reported through to Risk Management Board – <b>Medium risk recommendation 1.</b></li> <li>• MIAA review of a master list of BCP’s in place for each service area and individual fire station localities highlighted 3 departments (Prevention, HR, and ICT and 2 Fire stations – Powey Lane and Lymm) did not have an agreed recently updated BCP in place. MIAA recommends the existing BCP’s are reviewed. – <b>Medium risk recommendation 2.</b></li> </ul>
<p>Cheshire Fire and Rescue Service participates in a range of Business Continuity Planning exercises and response plans which address different scenarios. The results of these exercises are documented, and lessons learnt are identified and actioned.</p>	<p>Areas of good practice:</p> <ul style="list-style-type: none"> <li>• Dealing with the impact of the Covid-19 pandemic over the past couple of years has tested the continuity arrangements and resilience of CFRS and the wider public sector.</li> <li>• MIAA review of a sample of planning exercises including Covid interim debrief (Sept. 2020) and resulting action plans highlighted effective BC testing and identification of remedial actions to improve BC delivery.</li> <li>• MIAA detailed review of the BC planning exercise and interim debrief report for CFRS crisis management response to COVID highlighted the report considered specific areas relating to BC, including what worked well, what got in the way or limited CFRS effectiveness, what CFRS would do</li> </ul>

Sub Objective	Key Themes
	<p>differently in the event of a second wave, either locally or nationally and what are the key learning points.</p> <ul style="list-style-type: none"> <li>• Our incident management debrief report 21/22 included recommendations for wider organisational learning and communication and we have therefore not raised any recommendations as part of this review.</li> </ul>
<p>Training for staff meets the specific response needs of the Business Continuity Plan/Strategy. On-going training is provided to ensure that skills are maintained following updates to the plan/strategy.</p>	<p>Areas of good practice</p> <ul style="list-style-type: none"> <li>• MIAA discussions with CFRS BCP leads confirmed adequate training is undertaken, evidence highlighted “Introduction to Business Continuity” certificate was in place.</li> <li>• MIAA review of current guidance highlighted awareness is supported by the CFRS Business Continuity guidance and protocol (available on-line as E-Doc 1130) is designed to provide managers across all departments and functions within CFRS with advice on developing BCM arrangements and plans.</li> <li>• MIAA discussions with CFRS BCP lead (Head of Operational Policy &amp; Assurance) highlighted the ten Risk/BCP Champions have additional workshops to ensure they are all up to date with training. The last training conducted with the BCP Champions was Feb 2020 just prior to Covid19 pandemic. Refresher training is planned.</li> </ul>
<p>Appropriate governance arrangements are in place to provide assurance to the Fire Authority and Senior Management Team on the adequacy of Business Continuity Planning.</p> <p>An accountable officer has been identified and nominated to be responsible for the co-</p>	<p>Areas of good practice</p> <ul style="list-style-type: none"> <li>• The Risk Management Board (RMB) has a responsibility for an annual review of the Crisis Management Plan, this is written into the Terms of Reference for the Board.</li> <li>• RMB meets twice a year and we confirmed there was an up-to-date terms of reference, last updated March 2022. MIAA review of March 2022 RMB minutes and papers highlighted annual review of</li> </ul>

Sub Objective	Key Themes
ordination and oversight of the Business Continuity Plan.	<p>the CFRS Crisis Management Plan. RMB minutes are received by Fire Authority</p> <ul style="list-style-type: none"> <li>• Risk management arrangements within CFRS are supported by the Joint Planning, Performance and Risk team, who are part of the Joint Corporate Services function.</li> <li>• Additional oversight responsibility of individual BCP's and compliance with CFRS BCP policies and procedure is delegated to departmental Information governance, risk and business continuity champions.</li> <li>• In relation to the Joint Corporate Services covered under the Blue Light Collaboration for joint corporate services e.g. IT, Estates, People, Finance. These services provided by the joint services are reviewed and discussed quarterly at Joint Services Management Board (JSMB). Business Continuity arrangements for Joint Corporate services are managed and reported under different arrangements.</li> <li>• The Performance and Overview Committee meeting on 8<sup>th</sup> Sept 2021 received an annual report covering the period (1st April 2020 to 31st March 2021) on the performance of NWFC which included assurances in relation to business continuity.</li> <li>• Roles and responsibilities are clearly documented, the nominated accountable officer is the Chief Fire Officer. The BCP is reviewed twice a year and this review is signed off by the Deputy Chief Fire Officer.</li> </ul>

### 1.4 Recommendation Summary

The table below summarises the prioritisation of recommendations in respect of this review.

Critical	High	Medium	Low	Total
0	0	2	1	3

## 2 Engagement Objectives and Scope (Terms of Reference)

### 2.1 Objective

Sub Objective	Risk
<ul style="list-style-type: none"> <li>A formal risk assessment exists for each provided service that directly takes Business Continuity Planning into consideration.</li> </ul>	<ul style="list-style-type: none"> <li>No formal risk assessments are in place or their risk assessments do not directly consider Business Continuity Planning.</li> </ul>
<ul style="list-style-type: none"> <li>Overarching Strategy in place for Business Continuity planning which sets out roles and responsibilities.</li> </ul>	<ul style="list-style-type: none"> <li>Failure to provide a Business Continuity Plan that sets out how Cheshire Fire and Rescue Service will plan for, respond to and recover from a significant incident or loss of services.</li> </ul>
<ul style="list-style-type: none"> <li>A Business Continuity Plan in place that sets out how it will plan for, respond to and recover from a significant incident or loss of services. The response plan has been approved, is up to date and reviewed on a regular basis.</li> </ul>	<ul style="list-style-type: none"> <li>The plan is not reviewed/updated to reflect national guidance or change in circumstances</li> </ul>
<ul style="list-style-type: none"> <li>Cheshire Fire and Rescue Service participates in a range of Business Continuity Planning exercises and response plans which address different scenarios. The results of these exercises are documented and lessons learnt are identified and actioned;</li> </ul>	<ul style="list-style-type: none"> <li>Failure to participate in Business Continuity Planning exercises and response plans for different scenarios. Lessons learnt are not identified or actioned.</li> </ul>
<ul style="list-style-type: none"> <li>Business Continuity Plans are in place which are reviewed, tested and updated on a regular basis;</li> </ul>	<ul style="list-style-type: none"> <li>Business Continuity Plans are not in place at a departmental or corporate level;</li> </ul>
<ul style="list-style-type: none"> <li>Training for staff meets the specific response needs of the Business Continuity Plan/Strategy. On-going training is provided to ensure that skills are maintained following updates to the plan/strategy;</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate training for staff that does not meet the requirements outlined in the Business Continuity Plan.</li> </ul>
<ul style="list-style-type: none"> <li>There are appropriate Business Continuity arrangements in place for all sites.</li> </ul>	<ul style="list-style-type: none"> <li>The Business Continuity Plan does not provide adequate consideration for all sites or where CFRS is reliant upon another service e.g. North West Fire Control.</li> </ul>

<ul style="list-style-type: none"> <li>An accountable officer has been identified and nominated to be responsible for the co-ordination and oversight of the Business Continuity Plan.</li> </ul>	<ul style="list-style-type: none"> <li>Lack of accountability and oversight.</li> </ul>
<ul style="list-style-type: none"> <li>Appropriate governance arrangements are in place to provide assurance to the Fire Authority and Senior Management Team on the adequacy of Business Continuity Planning.</li> </ul>	<ul style="list-style-type: none"> <li>Governance, oversight and reporting arrangements are unclear and ineffective.</li> </ul>

## 2.2 Scope

MIAA considered any changes to the control environment due to COVID-19.

The limitations to scope were as follows:

- The scope of this review was to focus on the objectives described above and the controls in operation at Cheshire Fire and Rescue Service.
- The review also included the assurance arrangements for BCP within North West Fire Control.
- MIAA reviewed the arrangements for the service as a whole and a sample of services to be chosen by MIAA.

## 3 Detailed Findings and Recommendations

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

### 1. Rolling 3-year programme to review departmental BCP's

Risk Rating: Medium

#### Operating effectiveness

Key Finding – MIAA review of BC planning exercises highlighted a structured rolling programme of tabletop exercises (to be used to test each departmental plan over a three-year cycle) is in development. This was highlighted in our 2017/18 Business continuity review and has been developed for Joint Corporate Services. An overarching document to record the BCP owner, update, test, outcome and learning of each BCP should be developed and assurances reported via Risk Management Board.

Specific Risk – Departmental plans are out of date and do not accurately reflect current agreed BCP arrangements.

---

Recommendation – MIAA recommends the development of the structured 3 rolling plan is developed and assurances reported to Risk Management Board.

---

Management Response - Recommendation is noted, work underway to develop and implement this structure.

---

Responsible Officer – SM Tony McCourt

---

Implementation Date – 31<sup>st</sup> March 2023

---

---

<b>2. Up to date department and fire station BCPs are in place</b>	<b>Risk Rating: Medium</b>
--	----------------------------

---

Operating effectiveness

---

Key Finding – MIAA review of master list of BCP’s in place for each service area and individual fire station localities currently highlighted 3 departments (Prevention, HR, and ICT and 2 Fire stations – Powey Lane and Lymm) did not have an agreed recently updated BCP in place. **It should be noted that after the Final report was issued MIAA were provided with a copy of the BCP for HR and ICT joint corporate services.**

---

Specific Risk – Departmental plans are out of date and do not accurately reflect current agreed BCP arrangements.

---

Recommendation – MIAA recommends the existing BCP’s are reviewed, and the spreadsheet updated.

---

Management Response - Recommendation is noted. Full review will be carried out and records updated.

---

Responsible Officer – SM Tony McCourt

---

Implementation Date – 31<sup>st</sup> March 2023

---

---

<b>3. Availability of BCP on website.</b>	<b>Risk Rating: Low</b>
---	-------------------------

---

Operating effectiveness

---

---

Key Finding – The current BC policy requires non-confidential aspects of the BC plan are published on the CFRS intranet, MIAA review of the CFRS website highlighted the BC plan is not currently available.

---

Specific Risk – Non compliance with current BC policy.

---

Recommendation – MIAA recommends non confidential details are published on the intranet and CFRS website.

---

Management Response - Recommendation is noted. Non -confidential details will be identified for publication.

---

Responsible Officer – SM – Tony McCourt

---

Implementation Date – 31<sup>st</sup> March 2023

---

## Follow-up

A follow-up exercise will be undertaken during 2023 to evaluate progress made in respect of issues raised. This will include obtaining documentary evidence to demonstrate that actions agreed as part of this review have been implemented.

## Appendix A: Assurance Definitions and Risk Classifications

Level of Assurance	Description
High	There is a strong system of internal control which has been effectively designed to meet the system objectives, and that controls are consistently applied in all areas reviewed.
Substantial	There is a good system of internal control designed to meet the system objectives, and that controls are generally being applied consistently.
Moderate	There is an adequate system of internal control, however, in some areas weaknesses in design and/or inconsistent application of controls puts the achievement of some aspects of the system objectives at risk.
Limited	There is a compromised system of internal control as weaknesses in the design and/or inconsistent application of controls puts the achievement of the system objectives at risk.
No	There is an inadequate system of internal control as weaknesses in control, and/or consistent non-compliance with controls could/has resulted in failure to achieve the system objectives.

Risk Rating	Assessment Rationale
Critical	Control weakness that could have a significant impact upon, not only the system, function or process objectives but also the achievement of the organisation's objectives in relation to: <ul style="list-style-type: none"> <li>the efficient and effective use of resources</li> <li>the safeguarding of assets</li> <li>the preparation of reliable financial and operational information</li> <li>compliance with laws and regulations.</li> </ul>
High	Control weakness that has or could have a significant impact upon the achievement of key system, function or process objectives. This weakness, whilst high impact for the system, function or process does not have a significant impact on the achievement of the overall organisation objectives.
Medium	Control weakness that: <ul style="list-style-type: none"> <li>has a low impact on the achievement of the key system, function or process objectives;</li> <li>has exposed the system, function or process to a key risk, however the likelihood of this risk occurring is low.</li> </ul>
Low	Control weakness that does not impact upon the achievement of key system, function or process objectives; however implementation of the recommendation would improve overall control.