

# ISO22301 Clause 5

## NHS SBS Business Continuity and Resilience Management Policy

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|---------------|--|
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| Owner         | Claire Street – Head of NHS SBS Resilience |

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## 1. Purpose and Introduction

“Business Continuity is the capability of an organisation to continue the delivery of products and services within acceptable timeframes at predefined capacity during a disruption.” (ISO22301:2019).

A Business Continuity Management System (BCMS) is an essential part of any business, enhancing an organisation’s resilience by putting in place arrangements to help it respond to, and recover from, disruptive events effectively and efficiently. Business Continuity and Resilience Management (BCRM) provides reassurance to the organisation and its customers, allowing the organisation to focus on growth and development with confidence, while strengthening its ability to deliver strategic objectives.

## 2. Purpose and Justification

The purpose of the NHS SBS Business Continuity and Resilience Management Policy and the associated Framework is to document NHS SBS’s approach to Business Continuity (BC), providing a consistent and overarching structure for the implementation, operation, monitoring, and improvement of BC practices within NHS SBS.

The BCRM Policy applies to all areas of NHS SBS and any sub-contractors undertaking work for, or on behalf of, NHS SBS (where this work relates directly to NHS SBS and has material effect on their ability to deliver services in line with contractual obligations). The approach has been designed to ensure NHS SBS has an effective and well-practiced method for mitigating, responding to, and recovering from any BC Event, ensuring the protection of employees, customers, property, and the NHS SBS brand by enabling its critical services to remain operational in the event of disruption.

## 3. Scope

The NHS SBS BCMS Covers the following:

### **Locations**

- Bristol – Runway East Bristol Bridge, 1 Victoria St, Redcliffe, Bristol, BS1 6AA
- Salford (NW Hub) – Floor 9, 8 Exchange Quay, Salford, Manchester, M53EH
- Southampton – 2nd Floor, Building 3, Waterside Place, Southampton, SO14 2AQ
- Leeds – 1<sup>st</sup> Floor, Munroe Court, White Rose Office Park, Millshaw Park Lane, LS11 0EA
- Sheffield – Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ

- Mobile – Resources are home based.

### **Functions and Activities**

- Finance and Accounting (Inc IT&C)
- Employment Services
- Procurement
- Information Technology
- Consultancy Client Partnership and Business Development
- Finance
- Commercial
- Marketing and Communications
- Privacy
- Counter Fraud
- Facilities
- Human Resources

### **People**

- All resources employed within the included functions
- All resources contractually located at the included locations

### **Systems**

- All systems identified within the Business Impact Assessment for the included functions
- All hardware located at the included locations

### **Suppliers**

- All suppliers identified within the Business Impact Assessment for the included functions (Reference: NHS SBS – C04.01 Clause 4 – Context, Requirements and Scope V5.0)

## **3.1. Scope Exclusions**

The NHS SBS BCMS excludes the following areas:

### **Locations**

India

- Noida – A-67, Sector 64 201301 Noida, Uttar Pradesh

- Pune – A-28 to A-32 Talawade Software Technology Park MIDC, Talawade 412105 Pune, Maharashtra

These are excluded from the NHS SBS BCMS as these are covered by the Sopra Steria BCMS

### **Functions and Activities**

- IT India
- Resources and business areas provided by Sopra Steria

These are excluded from the NHS SBS BCMS as these are covered by the Sopra Steria BCMS

### **People**

- All resources employed within the excluded functions
- All resources contractually located at the excluded locations

### **Systems**

- All systems identified in the Business Impact Assessment for the excluded functions
- All hardware located at the excluded locations

### **Suppliers**

- All suppliers identified in the Business Impact Assessment for the excluded functions (Reference: NHS SBS – C04.01 Clause 4 – Context, Requirements and Scope V5.0)

## **4. Definitions**

| <b>Term</b> | <b>Description of Term</b>   |
|-------------|--|
| BC          | Business Continuity is the capability of an organisation to continue delivering its critical activities to pre-defined levels during a disruptive incident |
| BCM         | Business Continuity Management.  |
| BCMS        | Business Continuity Management System  |
| BCRM        | Business Continuity and Resilience Management.   |

|                     |  |
|---------------------|--|
| BCRMF               | Business Continuity and Resilience Management Framework. The methodology and procedures to be followed to ensure resilience is built into an organisation and business continuity is managed effectively.    |
| BCP                 | Business Continuity Plan. The recovery process for an area of the business in relation to either a specific activity or crisis event   |
| BIA                 | Business Impact Assessment. The assessment of process and service requirements to identify all possible mitigation and workarounds, threats, and risks and to feed the process of recovery during a BC Event |
| Incident Management | The NHS SBS Policy and Procedure for managing an Incident or Crisis (BC and Non-BC Events)   |
| Risk Management     | The NHS SBS Policy and Procedure for managing risk, identifying threats, and mitigating risk to acceptable levels as defined by the NHS SBS Risk Appetite.   |

## 5. Roles, Responsibilities and Authorities

(Reference: NHS SBS – C05.03 Roles, Responsibilities and Authorities V2.0)

### 5.1. Managing Director

- Overall accountability for the success of the BCMS.

### 5.2. Top Management Representative

- Accountable for the delivery of the BCMS in line with the ISO22301 standard
- Responsible for representing BC management at management reviews

### 5.3. Executive Team / Senior Leadership Teams

- Responsible for ensuring that service line has appropriate BC plans in place to ensure quick and controlled response and recovery
- Responsible for recovery from disruptive events
- Responsible for identifying and managing potential threats that may result in a disruptive event
- Responsible for promotion of BC management throughout service line and providing adequate resource capacity

#### **5.4. Head of Resilience**

- Nominated BC Lead with appropriate seniority, authority, and competence.
- Responsible for delivering BCMS in line with ISO22301 standard and the assessment of NHS SBS BCMS adequacy
- Responsible for leadership and coordination of all BCMS programme activities
- Responsible for provision of management review reporting, recommendations, and findings
- Responsible for provision of function review reporting, recommendation, and findings
- Responsible for coordination of internal audits and management reviews
- Responsible for maintenance of overarching BC documentation
- Responsible for creating and conducting awareness programmes
- Responsible for creating and conducting exercise programmes, including briefings and debriefings
- Responsible for keeping interested parties informed
- Responsible for maintaining relationships with functions and providing support during disruptive events

#### **5.5. Business Continuity Officer**

- Responsible for raising awareness about Business Continuity within NHS SBS
- Responsible for embedding BCMS
- Responsible for supporting with the coordination of internal audits and management reviews
- Responsible for supporting with maintenance of overarching BC documentation
- Responsible for supporting with creating and conducting exercise programmes, including briefings and debriefings



- Responsible for supporting with keeping interested parties informed
- Responsible for supporting with maintaining relationships with functions and providing support during disruptive events

## **5.6. Plan Owners**

- Responsible for maintaining business continuity impact assessments, plans and procedures in line with review cycles
- Responsible for updating documentation at the point of change
- Responsible for performing and reporting on BCMS programme activities as directed
- Responsible for taking part in and resourcing exercising
- Responsible for undertaking corrective actions in a timely manner
- Responsible for BC Plan invoke and stand down

## **5.7. Plan Reviewers**

- Responsible for the review of documentation in line with review cycles
- Responsible for updating documentation at the point of change

## **5.8. Supplier Owners**

- Responsible for ensuring that BCDR is built into all Supplier Contracts and managed throughout the lifetime of the contract
- Responsible for confirming that the suppliers BCDR is tested and maintained

## **5.9. System Owners**

- Responsible for ensuring that BCDR is defined and documented for all Systems and Applications
- Responsible for undertaking DR Testing in line with the Testing Strategy

## **5.10. People Managers**

- Responsible for understanding the BC Plans in place for the managers area of coverage

- Responsible for informing team of any changes that could impact Business Continuity
- Responsible for ensuring the safety of the team during a major event

### **5.11. Individuals**

- Responsible for ensuring that line manager has up to date contact information
- Responsible for ensuring adherence to Health and Safety / Evacuation protocols
- Responsible for looking after company equipment and maintaining ability to work from home where applicable

### **5.12. Area Risk Committee**

- Responsible for overseeing NHS SBS's compliance to the BCRM Policy and Framework

### **5.13. Quality Assurance Board**

- Responsible for monitoring BCMS reporting, recommendations, and findings.

### **5.14. Crisis and Incident Management Teams**

In alignment with the NHS SBS Incident Management Policy an incident management team will convene to address BC related incidents. The process to invoke an incident will be as stipulated within the Incident Management Procedure

#### **Gold / Crisis / SIRC Management – Responsible for Strategic Recovery**

A crisis is a situation with a high level of uncertainty that disrupts the core activities and/or credibility of an organisation and requires urgent action. These types of incidents require strategic recovery, managed by the Gold Command Team made up predominately of Exec Team Members. These types of incidents will likely also require the support of the Tactical and Operational Recovery Teams (Identified as Silver and Bronze Teams within the Incident Management Policy and Procedure)

#### **Silver /Service Incident Management – Responsible for Tactical Recovery**

Tactical recovery is managed by the Silver Command Team made up predominately of Senior Leaders from a single Line of Business. This can either be alongside the crisis management team for major incidents, or in response to a BC Event that impacts only a small section of the business and is not perceived as a crisis.

### **Bronze / Incident Management – Responsible for Operational Recovery**

Operational recovery is managed by the Bronze Command Team made up predominately of Process Owners, area specific managers and SMEs. This can be either alongside the Tactical Recovery Team for Major and Moderate incidents, or in response to minor BC Events from which there is only minor impact.

## **6. Business Continuity Policy Statement**

NHS SBS will, as far as reasonably practicable, provide and maintain Business Continuity and Disaster Recovery plans and procedures in order to protect and mitigate its business, employees, clients and other key stakeholders from the risk and consequences of any incident or force majeure event across services provided by NHS SBS (including services provided by nominated 3<sup>rd</sup> party suppliers).

In addition, NHS SBS will co-operate in all practicable ways to assist clients if an incident at a client site or approved 3<sup>rd</sup> party supplier (outlined in its contract) impacts NHS SBS or the services that NHS SBS provides. NHS SBS will also endeavour to support its clients in all practicable ways should a non-NHS SBS related BC event impact their organisation's ability to maintain critical services.

The BCRM Policy and Framework:

- Is informed by the International Standard: ISO22301:2019 Societal security – Business Continuity Management Systems.
- Respects NHS SBS devolved responsibility model, and where appropriate, values flexibility to ensure that lines of business can develop arrangements that meet their own specific needs and priorities.
- Requires all Services and Functions of NHS SBS to have effective and well-maintained BC Plans in place, to demonstrate continual improvement of their BCRM arrangements and to embed BCRM in decision making processes.
- Has been developed in alignment with NHS SBS's values, vision, culture, and strategic objectives.

- Aligns to existing NHS SBS governance policies relating to Risk and Incident Management.
- Is supported by the Executive Team, Senior Leaders and QAB Representatives.

## **6.1. Business Continuity Aims and Objectives**

The business continuity objectives will be met by way of a business continuity management system (BCMS) which will ensure that the business continuity plans, resources, capabilities and related arrangements provide optimum capability and assurance that the company will continue to provide critical services in the vast majority of unexpected disruption events

The implementation of the Business Continuity and Resilience Management Policy, and the associated Framework seeks to achieve the following objectives:

| <b>Objective</b>   | <b>Resource</b>   | <b>Accountable</b> | <b>Responsible</b>            | <b>Timeline</b>           | <b>Measurement</b>                             |
|--|---|--------------------|-------------------------------|---------------------------|--|
| Manage the BCMS in line with ISO22301 standards and BCI Good Practice Guidelines.  | Head of Resilience  | Erika Bannerman    | Claire Street/Sophie Robinson | Ongoing                   | ISO22301 Gap Analysis and BC Plan Progress     |
| Achieve ISO22301 certification in 2026.  | Head of Resilience/<br>Resilience Team/Top Management / Plan Owners | Erika Bannerman    | Claire Street/Sophie Robinson | 31/12/2026                | ISO22301 Certification                         |
| Ensure all areas within the scope of this policy has an up to date and annually approved Business Impact Assessment and Business Continuity Plan.        | Head of Resilience/<br>Resilience Team/Top Management / Plan Owners | Claire Street      | LOB Directors / Plan Owners   | In line with review cycle | BC Status Reporting<br>2 Monthly QAB Reporting |
| Achieve an appropriate level of Business Continuity competence across NHS SBS, in line with the Business Continuity and Resilience Management Framework. | Head of Resilience/<br>Resilience Team/Top Management / Plan Owners | Claire Street      | LOB Directors / Plan Owners   | Ongoing                   | Competence Report and Skills Matrix            |

|  |  |                 |                             |   |  |
|--|--|-----------------|-----------------------------|---|--|
| Treat all unacceptable disruption risks within 10 weeks of their identification. (Score over 15, Certain 5 with overall score of 10 and above) | Dependant on Risk Area   | Erika Bannerman | Claire Street               | Ongoing                                 | Enterprise Risk Register   |
| Limit the impact resulting from any incident to £100,000   | Head of Resilience/ Resilience Team/Top Management / Plan Owners | Erika Bannerman | Claire Street               | Ongoing                                 | Crisis / Incident Management Cost Reporting  |
| Carry out full scenario-based exercises for all plans in line with the Exercise and Testing Strategy.  | Head of Resilience/ Resilience Team/Top Management / Plan Owners | Claire Street   | LOB Directors / Plan Owners | In line with Exercise and Test Strategy | Quarterly QAB Reporting Meridian Completeness Report BC Status Reporting               |
| Remedy all identified nonconformities within 20 weeks of their identification.   | Head of Resilience/ Resilience Team/Top Management / Plan Owners | Erika Bannerman | Claire Street               | Ongoing                                 | Quarterly QAB Reporting  |
| Continually improve the BCMS so that business continuity capability becomes increasingly effective in terms of                                 | Head of Resilience/ Resilience Team/Top Management / Plan Owners | Claire Street   | Claire Street               | Ongoing                                 | ISO22301 Gap Analysis and BC Plan Progress Reporting Incident Reporting Risk Reporting |

|  |  |  |  |  |  |
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| operational effort, impact<br>limitation and overall cost. |  |  |  |  | Competence Report and<br>Skills Matrix |
|--|--|--|--|--|--|

## 7. Implementation and Monitoring

### 7.1. Implementation

This Policy will be published on The Hive. Employees will be made aware of this Policy through employee communications, training, and Business Continuity Awareness.

### 7.2. Process for monitoring implementation & effectiveness

For this policy, the following monitoring processes are in place.

| <b>Standard</b>  | <b>Monitoring process</b>   |
|--|---|
| Monitoring arrangements for compliance and effectiveness                     | The policy will be reviewed annually, and an annual report of any changes produced for the Quality Assurance Board  |
| Responsibilities for conducting the monitoring / audit                       | SBS Resilience Team   |
| Frequency of monitoring/audit of BCMS  | Annually – or as necessary following a Business Continuity event  |
| Process for reviewing results and ensuring improvements in performance occur | The Quality Assurance Board will review the results of this audit. The discussion and any action points will be recorded in the minutes and followed up by the Quality Assurance Board. |

## 8. Dissemination & Access to the Policy

### 8.1. Dissemination of and access to the policy

This policy will be accessible to all employees on the Resilience page of The Hive.

### 8.2. Review, Updating & Archiving



The Resilience Team will maintain an archive of all policy documents; this can be accessed by contacting the Resilience Team. This policy will be reviewed annually unless there are any legislative changes prior to this.

## 9. Information and References

- NHS SBS Business Continuity and Resilience Framework
- NHS SBS Incident Management Policy
- NHS SBS Incident Management Procedure
- NHS SBS SIRC Management Policy
- NHS SBS Risk Management Policy
- NHS SBS Health and Safety Policy

## 10. Version Control Sheet

If revising a policy/procedure summarise the key changes made in the comment's column.

Where a policy/procedure replaces a previous version, the old version will be archived in accordance with the Policy for the Development and Management of Policies and Procedures.

| Version | Date          | Author(s)   | Job Title                     | Comment                      |
|---------|---------------|---|-------------------------------|------------------------------|
| 0.1     | December 2020 | Claire Street                                       | Head of BC and F&A Governance | Draft                        |
| 0.2     | January 2021  | Kirstie Hartlebury/Lisa Tann/Sharon Wedgwood-Wailes | IG Service                    | Review of initial draft      |
| 0.3     | January 2021  | Claire Street                                       | Head of BC and F&A Governance | Final Draft                  |
| 1.0     | February 2021 | Claire Street                                       | Head of BC and F&A Governance | Published Draft              |
| 1.1     | March 2022    | Claire Street                                       | Head of BC and F&A Governance | Updated to align to ISO22301 |

|     |               |                 |                               |   |
|-----|---------------|-----------------|-------------------------------|---|
| 2.1 | Jan 2023      | Claire Street   | Head of BC and F&A Governance | Updated Salford, Leeds and Sheffield Addresses              |
| 2.2 | January 2023  | Claire Street   | Head of BC and F&A Governance | Updated following QAB feedback                              |
| 3.0 | January 2023  | Claire Street   | Head of BC and F&A Governance | Approved Version  |
| 4.0 | February 2024 | Claire Street   | Head of BC and F&A Governance | Approved Version  |
| 5.0 | January 2025  | Claire Street   | Head of BC and F&A Governance | Approved Version  |
| 5.1 | December 2025 | Sophie Robinson | Resilience Officer            | Updated addresses and organisation functions and activities |
| 6.0 | 09/02/2026    | Claire Street   | Head of BC and F&A Governance | Approved Version  |
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