



Department for Work & Pensions

Business Continuity Strategy

**Business Continuity Resilience and
Emergency Response (BC&ERT)**

Dated April 2021

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Review Process

This Strategy will be reviewed as a minimum annually or as business needs dictate.

Approval Process

Prior to obtaining sponsor endorsement and circulation to all staff, this Strategy will be approved by all SLMT members, ratified by the Heads of BCR&ER and authorised to implement by the Deputy Director of DWP Security, Continuity Resilience and Response.

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Executive Summary

Business Continuity Management (BCM) is a business owned, business driven process that establishes a fit for purpose strategic, tactical and operational framework. In essence it is a holistic approach, helping to identify and plan against risks that could affect the smooth running of DWP's objectives, its infrastructure and customer service. The framework develops the resilience and capabilities to maintain and deliver effective responses that safeguard the interests of DWP's customers, key stakeholders, activities, brand and reputation.

This Strategy sets out how DWP will deliver a professional BCM Service for our customers and to continue to deliver, maintain and enhance our high reputation by supporting other government departments during wider disruptions.

Having tried and tested Business Continuity (BC) Plans and procedures in place ensures 'business as usual' services at an acceptable pre-determined level. Incidents can be wide and varied and range from the external environment, over which we have no control, or from incidents within the organisation. Examples

include but not limited to fire, flood, power failure, loss of IT, industrial action.

We will deliver DWPs Policy and Strategy through a skilled professional and competent workforce, all trained as a minimum to the Business Continuity Institute's (BCI) Good Practice Guidelines (GPG). Our services and methodologies shall directly align to the International ISO 22301 BC standard. We will be judged through our work by meeting the standard requirements to firstly, successfully obtain the Cabinet Office ISO 22301 alignment certificate and then seek full ISO 22301 accreditation.

1. Introduction

1.0 Link between the BC Policy and BC Strategy

The BC Strategy should be read in conjunction with DWP's BC Policy. The Strategy builds onto the Policy and confirms the strategic steer. The actions must be followed and methods adopted to successfully achieve the objectives outlined in the Policy. The Strategy adopts a holistic approach and is critical to enhance resilience.

The BC&ER team will seek ISO 22301 certification to:

- Provide confidence to our partners and other government departments that DWP meet international standard, increasing customer confidence and engagement.
- Assure Cabinet Office and Civil Contingencies Secretariat that DWP have a robust and resilient Business Continuity Management System (BCMS)
- Provide evidence of a proven robust, resilient, aligned/ compliant BCMS
- Enhance DWPs brand, image and reputation
- Demonstrate good corporate governance and satisfy audit requirements
- Provide proof of a managed BC risk process
- Independently validate DWPs approach to Business Continuity to industry best practice

DWPs BC Products

A suite of supporting documents will detail the process that DWP adheres to in order to ensure the requirements are met and reflect the requirements of ISO 22301. This will include this Strategy, Policy document and the following:

- Analysis Delivery Framework – Defines how DWP will undertake analysis of DWP objectives, products and services, risks and horizon scanning
- Design Delivery Framework – Defines DWPs approach to identifying and development of continuity and recovery strategies
- Implementation Delivery Framework – Defines DWPs approach to implementing continuity and recovery strategies through BCP/Incident Management Framework and response structures
- Validation Delivery Framework - Defines DWPs validation of the management system through an exercising and assurance approach
- Embedding Delivery Framework – Defines DWPs approach to integrating BC into day to day business activities/roles and responsibilities through training/capability, engagement
- Annual Business Delivery Plan (Programme Management)
- Strand Activity Report – Milestones and Performance Indicators, which will provide an overview of the BCMS activities, risks and milestones. An Executive Summary will be produced monthly.

1.1 Purpose

The BC Strategy provides:

- A framework for building organisational resilience with the capability for an effective response.
- Ensures appropriate measures are in place to reduce the potential consequence of any incident or disruption
- Provides assurance to DWP, its customers and stakeholders that due to an effective planning process, any incident or disruption will be minimised
- Ensures continuity of critical activities following any incident or disruption
- Ensures DWPs BCMS is fully aligned to the requirements of ISO 22301
- Complies with the direction outlined in the BC Policy
- Aligns to all requirements of ISO22301 and other legal, regulatory requirements and best practice as detailed in the BC Policy

1.2 The Objectives of the BC Strategy

The objectives of the BC Strategy are to set out the expectations in carrying out, managing, co-ordinating and governing the requirements outlined in the BC Policy.

2. DWPs Approach

2.0 Overview

DWP has opted to follow the International Standard for BC ISO 22301 and the Business Continuity Institute's (BCI) Good Practice Guidelines, as a foundation for their BCMS. The following approach will be delivered to achieve the BC

Management Objectives to ensure continuity for DWP'S 8 priority services as outlined in the BC Policy.

2.1 Alignment to the Business Continuity Institutes (BCI) Lifecycle

DWPs BCMS adheres to the BCI life-cycle; the following extract details the six key stages of this lifecycle.

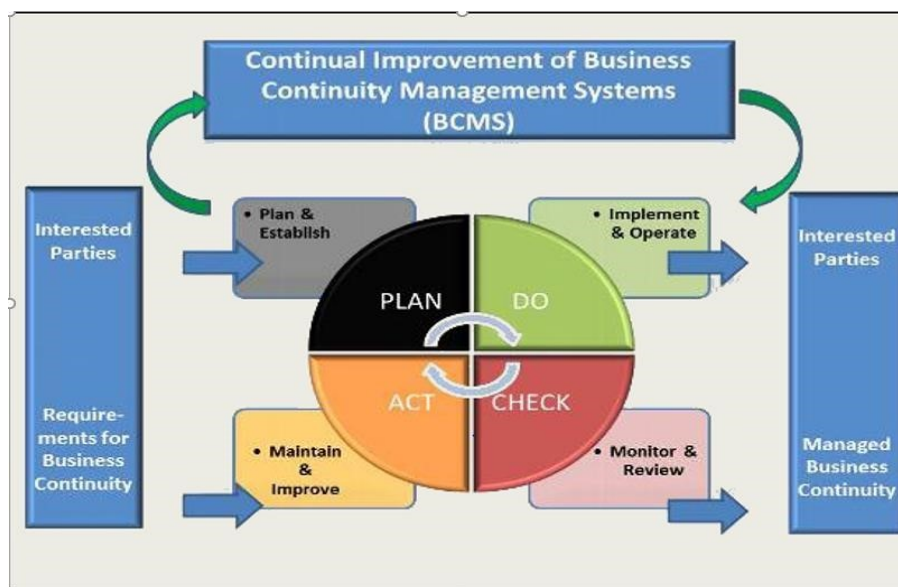
| Six Key Elements | Why/Purpose | How / Strategic approach |
|---------------------------------|--|--|
| Policy and Programme Management | The management practice that's defines the organisational/DWP policy to Business Continuity and how that policy will be implemented, controlled and validated through a BCM programme. | <ul style="list-style-type: none"> ➤ Ensure level of detail in DWP process documents supports a robust BCMS which is ultimately aligned to requirements of ISO 22301 ➤ A senior leader at Director level has been appointed as BC champion to drive forward the BC programme. |
| Embedding | The management practice that continually integrates BC into day to day activities and organisational culture | <ul style="list-style-type: none"> ➤ Dedicated Communications lead in place, maintaining and promoting our DWP BC intranet page. ➤ Promote Business Continuity Awareness Week with awareness materials and senior leader engagement to promote the activity ➤ Heads of BCR&ER work with DWPs executive board to sustain a strong BC culture |
| Analysis | The technical practice within the lifecycle that reviews and assesses the organisation within the constraints of the operating environment | <ul style="list-style-type: none"> ➤ Undertake comprehensive data gather and analysis across DWP products and services. ➤ Using BIA process to identify key products and services identifying the activities and IT which underpin them, assessing risk and threats and supporting the development of contingency plans |
| Design | The technical practice that identifies and selects appropriate strategies | <ul style="list-style-type: none"> ☛ Business partnering across all DG groups supporting |

| | | |
|----------------|---|--|
| | and tactics determining how continuity and recovery from disruption will be achieved. | <p>implementation of BC programme and policy.</p> <ul style="list-style-type: none"> ➤ Embed BC strategies developed through BIAs. ➤ Design of solutions to optimise safe separation in protecting assets and DWP processes. ➤ Stakeholder in Disaster Recovery planning for all critical IT infrastructure, systems and applications to support delivery of DWP business priorities. |
| Implementation | The technical practice that executes the agreed strategies and tactics through the process of developing a Business Continuity Plan (BCP) | <ul style="list-style-type: none"> ➤ Ensure all plans are maintained and reviewed annually or earlier ➤ Provide generic templates to identify critical services and procedures in place ➤ Provide 24/7 incident response service. ➤ Ensure Incident Management Framework drives the adopted Gold, Silver and Bronze system ➤ Support DWP to bring back services after serious disruption being guided by the eight DWP business priorities. |
| Validation | The technical practice which confirms that the BCM Programme meets the objectives of the policy and that the BCP is fit for purpose. | <ul style="list-style-type: none"> ➤ BCR&ER drive a comprehensive, annual BC Exercising Programme across DWP ➤ Ensure BC Plans are validated by exercise and plan review. ➤ Share the BCR&ER lessons learned methodology and procedure. ➤ Provide advice, guidance and support for the BC community to deliver effective exercises at a local level |

DWPs BC objectives will be achieved by following an annual activity cycle in line with the following “Plan, Do, Check, Act” model.

- Plan: Establish Business Continuity Policy, objectives, targets, controls, processes and procedures relevant to improving business continuity in order to deliver results that align with the organization's overall policies and objectives.
- Do: Implement and operate the Business Continuity Policy, controls, processes and procedures.
- Check: Monitor and review performance against business continuity policy and objectives, report the results to management for review, and determine and authorize actions for remediation and improvement.
- Act: We act or adjust things accordingly, based on our checks. For example, if our goal wasn't achieved we seek to implement a countermeasure, sharing lessons learned. Or, if our goal was indeed achieved, we would document what we did and standardise the process, sharing best practice.

Plan Do Check Model



2.2 Monitoring, measurement, analysis and evaluation

DWPs BCR&ER team collect and analyses performance metrics and data from across DWP to assess and report the performance of the BCMS. Management Information will be reviewed monthly by senior management with quarterly and annual reports issued to evidence the performance of the Business Continuity Management System. An Executive Summary is produced monthly.

Continuous improvement will be made to processes and plans to enhance performance through reviews and lessons learned.

2.3 Audit and Assurance

DWP will commence discussions with an independent auditor with a view to scoping out and seeking the Cabinet Office ISO22301 Formal Alignment Certificate in the first quarter. DWP will look to for achieving formal alignment of ISO22301 from the Cabinet Office once alignment has been achieved.

2.4 Compliance

To ensure compliance with BC best practice, the BCR&ER Team operate an annual quality assurance programme, every BC Plan is reviewed and rated along with the performance of BC responsibilities in each part of DWP (further information in relation to this process is located in the Validation Delivery Framework document).

2.5 Supplier Assurance

Suppliers are required to have and supply evidence, if requested, of their BC Programme. These are subject to and must be compliant with DWP BC requirements. Suppliers are expected to submit their BC Plans for scrutiny by a DWP BC Practitioner. This ensures preferred suppliers meet DWP standards.

Prior to contracts being awarded and suppliers being subjected to full BC scrutiny, prospective suppliers will be evaluated to determine their suitability to tender, using a series of red line questions.

Commercial Directorate Contract Managers will undertake an annual review of a supplier's BC Programme to determine that it remains fit for purpose.

2.6 Training & Awareness

Training of key personnel, including the Board, to further enhance ownership and awareness of BC will be completed when taking up post and refreshed at least annually.

All staff must complete the BC training module on the CSL website annually. All Gold Commanders will receive Gold Commander training and those responsible for responding to the media, will have received media training.

2.7 Meeting Structures

The following meetings will be held to discuss Business Continuity:

| Meeting Frequency | Attendees | |
|---------------------------------|--------------------|--------------------|
| BCSLT | G6s, All G7s | Monthly |
| Service Delivery and Engagement | G6, G7s | Weekly |
| Extended Leadership Meetings | G6s, G7s, SEOs | Quarterly |
| Strand Team Meetings | All Strand Members | Weekly/Fortnightly |
| All Team Meetings | All Team Members | Monthly |
| Cross Functional Workshops | Nominated Reps | Monthly/Quarterly |

3. Roles, Responsibilities and Accountabilities

BC is not just a leadership responsibility; all colleagues have a role to play.

3.0 All Staff

Everyone must:

- Follow senior management direction
- Know what to do in the event of any disruptive incident
- Know how to report an incident and to whom
- Contact their line manager during any emergency or disruptive incident. Let their manager know they are safe, especially when travelling
- Carry a DWP Emergency Information Card and program the Staff Emergency Line Number into their work mobiles. For those who do not have a work mobile, they should consider programming the number into their personal mobile phones
- Line managers must ensure that all employees have completed the general BC awareness training on the Civil Service Learning (CSL) website

3.1 Senior Leaders

Senior leaders shall ensure that the BCMS objectives within the BC Policy are incorporated into their part of the business. They are accountable for establishing and maintaining adequate BC planning arrangements for the services or functions they lead.

They shall support an approach which provides effective governance and leadership, to include the following:

- Awareness of their own BC roles and responsibilities, as well as the roles and responsibilities of others
- Understand their role under the Gold/Silver/Bronze incident response model.
- Shall be responsible for ensuring that all Plans are exercised at least once a year unless the Plan has been extensively tested through invocation against a range of real life incidents
- Ensure compliance to BC objectives shown in the Policy
- Ensure that Contractors are clear on their roles and responsibilities during an incident

3.2 BC Practitioners

DWP has a large network of BC practitioners whose roles and responsibilities are documented fully in DWP BC Plans. These managers must fulfil their BC Management obligations by adhering to the BC controls that are set centrally by the DWP BCR&ER Team for compliance purposes.

The roles and responsibilities vary through the BCPs however the following responsibilities are consistent (although some additional responsibilities can be viewed within the individual plans).

BC Manager/ BC Coordinator

- Maintains the BCP
- Undertakes a quarterly communication test
- Undertakes an annual exercise of the BCP

Senior Responsible Officer (SRO)

- Approving BCP
- Invoking the BCP
- Standing down the BCP

Further roles and responsibilities can be found within individual BCPs.

3.3 BCR&ER Team

The BCR&ER Team are responsible for supporting and strengthening BC capability across the wider BC community, driving forward the delivery of the entire BC Programme for DWP. In essence a centre of excellence where all members of the team are competent BC professionals. As a minimum all staff must have passed the Business Continuity Institute's (BCI) Good Practice Guidelines (GPG) or working to achieve this. The team provide a single service in respect of all parts of the BCI lifecycle, resulting in a robust, resilient BCMS aligned to the International Standard ISO 22301.

The BCR&ER Team will ensure that consideration and compliance of all legal, statutory, regulatory and contractual obligations are applied. Ensuring the welfare needs and the continuance of business is in line with the interests of all its key stakeholders and customers.

The BCMS and employee objectives will be monitored and managed by following an annual cycle of review and exercising plans, in line with the PDCA model, to continually improve the effectiveness of DWPs BCMS

The BCR&ER Team will support DWP by undertaking the following action:

- Regular reviews of BC Plans, these reviews will be based on;
 - Business or site priority rating, or
 - Following a BC incident, or
 - Following significant changes to personnel or organisational structures.
- Developing a comprehensive Monitoring, Training and Awareness Programme
- Deliver BIAs in line with GPG, identifying and prioritising Products and services and to determine the processes and activities to deliver these
- Embedding BC into DWP's business
- Conduct analysis to assess risks and threats, escalating where necessary
- Support reviews and determine exercise priorities
- Set targets for Disaster Recovery
- Use its Emergency Response Plan to govern and deploy targeted responses during significant incidents or emergencies that are not directly related to DWP service delivery, but require a DWP response

The BCR&ER Team will follow a Business Partner structure to deliver Business Continuity end to end.

The team will provide Service Delivery and Engagement to the following areas including a lead role in ensuring consistency and quality for the BC lifecycle and Cross Team activity:

- **Work and Health Services** - To build effective business partnering relationships across Work and Health services, providing effective support to the area and delivery on key activities to support the wider team. There will be a lead responsibility for Regional Reporting.
- **Service Excellence** - To build effective business partnering relationships across Service Excellence, providing effective support to this area and the delivery on key activities to support the wider team. There will be a lead responsibility for Exercising and Assurance.
- **Finance Commercial and Digital** - To build effective business partnering relationships across Finance and Digital (including Commercial Partners) and lead responsibility for Analysis & Design.
 - *Finance Group* – Working with business owners of benefit payment systems, making sure the integrity, security and resilience of the transactions are maintained and supporting the resolution of payment issues.
 - *Commercial Directorate* – Working to embed BCM and resilience practices into an 'end-to-end procurement lifecycle model' which supports the Department's strategic objectives, change agenda and live running supplier management.
 - *Digital Group* – Working with experts from Digital, Policy, Operational Delivery and other professions to embed resilience to DWP's digital infrastructure, creating the right solutions for our colleagues and our customers, breaking down traditional boundaries within our department to meet our shared objectives.
- **Central/Corporate Services** - To build effective business partnering relationships across allocated Corporate Services and to take a lead role in exercising and awareness required with the Executive Team. Defining capability and training requirements for these areas and provide appropriate support the deliver this activity. To manage all Business Continuity Team internal governance requirements and products ensuring alignment to the ISO 22301 standard. To deliver Departmental Wide plans, communications and delivery of the Business Continuity Software Tooling. Also, to deliver MI reporting and analysis.
- **Crisis and Incident Response** - Provision of a forward-thinking crisis and incident response function for DWP, including a briefing and reporting centre of excellence.

- **Planning and Capability** - To provide a DWP focal point for Cross Government planning and to drive resilience improvements across the business continuity community, internally and externally.
- **Business Partnering Roles and Responsibilities**
The Business Partnering roles for **Work and Health Services, Service Excellence, Finance Commercial Digital and Corporate Services** will deliver the following consistent activities:
 - Implement Development Plans for all team members
 - Define business area activities for analysis
 - Agree baseline of current position
 - Define products to be developed and timeframe to achieve
 - Implement agreed BIA approach
 - Deliver agreed BCP templates
 - Scope and deliver exercising programme for area
 - Agree and deliver assurance programme for area
 - Define capability and training requirements for area and provide appropriate support to deliver this activity

Specific Business Partnering Responsibilities can be found in detail in the Roles and Responsibilities

3.4 Governance

DWP have in place a formal documented BC governance programme, where progress in relation to all stages of the BC lifecycle is reported and discussed by the BC Senior Leadership Team (BCSLT).

The BCSLT have a major role to play in relation to the long-term strategy of DWP, they have the authority to make decisions, approve and sign off documentation. Responsibilities include, monitoring, measuring and reviewing progress (including risk and horizon scanning, this ensures the BCMS is effectively managed).

The BCSLT are responsible for ensuring the DWP BCM work programme is adequately resourced and directs the work of the central BCR&ER Team, this team ensures the BCM programme activity is managed and co-ordinated in accordance with the International Standard ISO 22301.

The BCSLT have their own terms of reference, which members must sign up to, this team meet on a regular basis, all members of the group are Grade 7. The BCSLT is chaired by DWPs Heads of BCR&ER.

3.5 Business Continuity Champion

The role of the Business Continuity Champion is to represent Business Continuity requirements at Executive Team level, overseeing the out-puts from all governance boards, reporting the status of Business Continuity to the board, escalating areas of concern, including non-compliance and risks.

The role also provides senior oversight of Business Continuity planning and incident management.

4. Current Status

Where are the BC&ER team now?

The BC&ER team work across DWP and wider Government to ensure that procedures and policies are in place which help to manage the impact of incidents or failure. We work with partners to prevent incidents, quickly detect and respond to crisis and speed up recovery to acceptable levels.

The BC&ER team provide a service across DWP to review, plan and ensure it can deliver on its priorities both day to day and during a crisis. We lead on behalf of government the approach to BC professionalism and development.

Alignment

DWP currently measure their BCMS against the BCI Good Practice Guidelines (GPG) this is the Global Guide to Good Practice in BC, in addition, they also “self-align” their BCMS to the BC International Standard ISO 22301.

DWP are currently seeking a formal ISO 22301 “Alignment certificate” this process involves a totally independent assessment of their BCMS against the stringent requirements of this standard.

Once DWP achieve formal “Alignment” DWP’s vision will be to work towards a fully compliant BCMS, with the ultimate goal of obtaining full ISO 22301 “Accreditation”

The main emphasis of the standard requires strong leadership, the setting of measurable objectives, performance, evaluation, analysis and demonstrating the effectiveness of the entire BCMS. Documentary evidence to demonstrate how DWP align to all of the requirements will be necessary

This process will consider the following: -

To review the MI currently being collected and monitored against GPG and ISO 22301 to ensure it is robust and relevant, ultimately providing the necessary assurance required.

Continue to monitor competence of all BCR&ER staff to ensure, all staff as a minimum to have successfully passed the GPG exam.

Embedding a Digital Solution

The current BC Process use manual Word & Excel templates. This is administratively intensive and difficult to maintain given the size and complexity of the department.

The BC&ER team aim to automate BC processes to deliver workflow efficiencies for BC&ERT and for the BC community in the wider business.

Annex 1 Abbreviations

| Abbreviation | Term |
|--------------|------|
|--------------|------|

| | |
|--------|---|
| BC | Business Continuity |
| BCI | Business Continuity Institute |
| BCM | Business Continuity Management |
| BCMS | Business Continuity Management System |
| BCP | Business Continuity Plan |
| BCR&ER | Business Continuity Resilience & Emergency Response |
| BIA | Business Impact Analysis |
| DR | Disaster Recovery |
| ET | Executive Team |
| GPG | Good Practice Guidelines |
| IT | Information Technology |
| BCSLT | Business Continuity Senior Leadership Team |

Annex 2 Definitions

| Abbreviation | Term | Definition | Source |
|--------------|------|------------|--------|
|--------------|------|------------|--------|

| | | | |
|------|---------------------------------------|---|---|
| BC | Business Continuity | The capability of the organization to continue delivery of products or services at acceptable predefined levels following disruptive incident | BS EN ISO 22301:2014 Societal security – Business continuity management systems-Requirements |
| BCI | Business Continuity Institute | The BCI is a global Membership Institution for Business Continuity Professionals. The overall purpose is to promote the art and science of business continuity worldwide. | BCI |
| BCM | Business Continuity Management | A holistic management process that identifies potential threats to an organization and the impacts to business operations from those threats, if realized, might cause, and which provides a framework for building organizational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and valuecreating activities. | ISO 22301:2012 Societal security – Business continuity management systems-Requirements |
| BCMS | Business Continuity Management System | Part of the overall management system that establishes, implement, operates, monitors, reviews, maintains and improves business continuity. | ISO 22301:2012 Societal security – Business continuity management systems-Requirements |
| BCP | Business Continuity Plan | Documented procedures that guide organizations to respond, recover, resume, and restore to a pre-defined level of operation following disruption. | ISO 22301:2012 Societal security – Business continuity management systems-Requirements |

Annex 2 Definitions (cont'd)

| Abbreviation | Term | Definition | Source |
|--------------|--------------------------|--|---|
| BIA | Business Impact Analysis | The process of analysing activities and the effect that a business disruption might have upon them. | ISO 22301:2012 Societal security – Business continuity management systems- Requirements |
| DR | Disaster Recovery | The process of developing and maintaining recovery strategies for information technology systems applications and data. This includes networks, servers, desktops, laptops, wireless devices, data and connectivity. | BCI Disaster Recovery Journal |
| GPG | Good Practice Guidelines | A Management guide to Global good practice in Business Continuity. The body of knowledge produced by the Business Continuity Institute | BCI GPG 2018 Global Edition |

