

BUSINESS CONTINUITY POLICY

Presented by Head of IT & Business Support

EXECUTIVE SUMMARY

The purpose of this report is to seek Member approval for the draft Business Continuity Policy and recommendation to the Authority for its adoption. The Policy has been reviewed and updated by officers including Senior Management Team, in line with review timelines to ensure it is current and relevant.

RECOMMENDATION

Members Approve: (1) the draft Business Continuity Policy attached as Appendix A to this report to the Authority for adoption.

BACKGROUND

- 1 The Authority has a register of Policies that ensure the organisation works efficiently and consistently towards delivering its Business Strategy. As required, new policies are introduced to safeguard the Authority and make sure that all staff are conforming within current legislation and best practice.
- 2 Business Continuity Management arrangements have been developed for implementation in a safe, prioritised and structured manner with the commitment of the Senior Management Team (SMT) for the services and sites within the Authority's control.
- 3 As part of a review of all processes involved with the management of risk and business continuity, the Business Continuity Policy has been reviewed and updated to be current and relevant.

BUSINESS CONTINUITY POLICY

- 4 A draft of the Business Continuity Policy is attached at Appendix A to this report for Members consideration and approval.
- 5 The Business Continuity Policy sets out the principles and practices that the Authority will adopt to meet its legal obligations and its commitment to ensure the safety of both customers and staff when within the Authority's facilities or

outside spaces and to ensure that, in the event of any business continuity incident, the initial response to a threat to the Authority's normal business is appropriate, robust and as coherent and effective as possible in the circumstances.

- 6 The policy seeks to ensure that the Authority complies with relevant legislation and that any associated procedures safeguard both customers and staff at all times, with a business impact and disaster recovery process to be followed in the event of any incident.
- 7 The updates to the Policy include job title changes, terminology updates, renaming group titles; for example the Business Continuity Steering Group has been renamed to Business Continuity Working Group and some cosmetic changes (front cover has been updated).
- 8 A key new addition to the report is the adoption of the C3 framework and the Gold-Silver-Bronze or 'GSB' command structure as a clear hierarchical framework and operational clarity for the command of major incidents or disasters.
- 9 The Policy is and has always been for the Authority. For the Leisure Services contract (LSC) venues, the operator (GLL) is required to have their own Business Continuity and Major Incident policies. This is covered in the Leisure Services Contract (under section 3.20). The Business Continuity Co-ordinator is responsible for ensuring that the LSC Contractor provides a copy of their Corporate and Facility Incident Management Plans to the Authority.

ENVIRONMENTAL IMPLICATIONS

- 10 There are no environmental implications arising directly from the recommendations in this report.

FINANCIAL IMPLICATIONS

- 11 There are no financial implications arising directly from the recommendations in this report.

HUMAN RESOURCE IMPLICATIONS

- 12 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- 13 There are no legal implications arising directly from the recommendations in this report.

RISK MANAGEMENT IMPLICATIONS

- 14 Failure to have an up to date policy could impact the score of risks SR6.2 and SR6.3 of the Risk Register.

EQUALITIES IMPLICATIONS

- 15 There are no equalities implications arising directly from the recommendations in this report.

Author: Simon Clark, 07734 021746, sclark@leevalleypark.org.uk

PREVIOUS COMMITTEE REPORTS

Executive Committee	E/773/22	Business Continuity Policy	22 September 2022
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APPENDIX ATTACHED

Appendix A	Business Continuity Policy
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LIST OF ABBREVIATIONS

C3	Command, Control, and Communication Event Command Structure
GSB	Gold, Silver, Bronze hierarchy
the Authority	Lee Valley Regional Park Authority
GLL	Greenwich Leisure Limited
LSC	Leisure Services Contract
SMT	Senior Management Team
SR6.2	Impact on Authority's reputation due to service failure caused by pandemic or infectious disease, damaged stakeholder and/or contractor relationships.
SR6.3	Incident at a Major event that affects the reputation of the Authority and/or venue and could result in loss of major event bookings

Business Continuity Policy

September 2025

Reference: [Version 0.6]

This document is controlled by Lee Valley Regional Park Authority.

Lee Valley Regional Park Authority,
Myddelton House, Bulls Cross,
Enfield, Middlesex, EN2 9HG

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Title: **Business Continuity Policy**

Status: Draft

Current Version: v0.6 (September 2026)

Author	Simon Clark – Head of IT and Business Support Sport and Leisure ✉ sclark@leevalleypark.org.uk ☎ 03000 030 633
Sponsor	Dan Buck – Corporate Director (Sport and Leisure) Sport and Leisure Department ✉ dbuck@leevalleypark.org.uk ☎ 03000 030 610
Consultation:	Corporate Directors H&S Contractor Heads of Service Facility Managers Business Continuity Working Group Policy and Procedure Review Group
Approved	Approved by: XXXXXXXX Approval Date: 00 XXXXXXXX 202X Review Frequency: Every Five Years Next Review: September 2030

Version History		
Version	Date	Description
0.1	22 July 2020	Initial draft, circulated to SMT, RDHS
0.2	3 September 2020	Revision after circulation to SMT, RDHS
0.3	1 September 2022	Further revision after commencement of Leisure Service Contract
0.4	20 October 2022	Policy approved by Authority A/4323/22
0.5	12 February 2024	Review and update
0.6	14 August 2025	Review and update circulated to SMT and Right Directions
0.6	23 October 2025	Policy approved by Authority

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Definition of Business Continuity Management

According to the Business Continuity Institute, business continuity management is “an holistic management process that identifies potential threats to an organisation and the impacts to business operations that those threats, if realised, might cause, and which provides a framework for building organisational resilience with the capability for an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities”.

LVRPA Business Continuity Policy

This policy ensures that the Authority’s Business Continuity Management arrangements are developed and implemented in a safe, prioritised and structured manner with the commitment of the senior management team.

The objectives of the Authority’s business continuity policy are to ensure as far as practicable that the Authority:

- maintains a strategy for reacting to, and recovering from, adverse situations which is in line with an agreed level of acceptable risk
- takes action to prevent the occurrence or recurrence of an adverse situation through adopting appropriate risk controls
- maintains a programme of activity and services which ensures the Authority has the ability to react appropriately to, and recover from, adverse situations in line with predefined business continuity objectives
- maintains appropriate corporate and facility response and recovery plans underpinned by a clear escalation process
- minimises financial loss and that in the event of a business failure there is minimal financial burden
- rehearses response and recovery plans at least annually
- maintains a level of resilience to operational failure in line with the risks faced
- maintains employee awareness of the Authority’s expectations of them during an emergency or business continuity threatening situation
- takes account of changing business needs and ensure that the response plans and business continuity strategies are revised where necessary (*Business continuity working group*)
- remains aligned with good industry practice in business continuity management
- responds to an initial threat to the Authority’s normal business in a manner that is appropriate, robust and as coherent and effective as possible in the circumstances;
- keeps the impacts of the threat within acceptable levels as pre-defined by the relevant Senior Management Team (SMT) on initial threat analysis;
- ensures that in recovery towards business as normal, priority is given to maintaining or restoring activities or services that are regarded as business critical in the circumstances; and
- provides training, advice and support to relevant staff within the Authority in order to achieve the above, in cooperation with others as appropriate; the process is not centrally directed.

It is not an objective of business continuity planning within the Authority to ensure that, in the worst cases such as prolonged loss of use of an entire facility or service, full recovery to business as normal can be achieved quickly, or indeed in any particular timeframe. To guarantee any such recovery to any pre-determined specific deadline would be unrealistic and require prohibitively expensive resilience measures.

Leisure Services Contract (LSC) Business Continuity

The Leisure Services contract sets out the required outcome in relation to Business Continuity and Major Incident reporting (Section 3.20). The Business Continuity Co-ordinator is responsible for ensuring that the LSC Contractor provides a copy of their Corporate and Facility Incident Management Plans to the Authority.

Definitions of Severity of incidents

When assessing the severity of an incident will be profiled as either a Minor, Medium or Major incident.

Minor incident:

These are incidents not meeting the definition of a medium incident or a major incident. The majority of these will be dealt with as part of the normal day to day operations of the organisation. These might include minor illnesses or injuries which are treated on site.

Medium incident:

When the response, although expected to be relatively short lived, cannot be contained within the resources on-site/within the service.

Major incident:

It is likely that these incidents could cause or threaten death or injury to people and/or have a major impact on the operation of a venue. It will also include something that may have serious legal or reputational ramifications for the Authority.

These include anything which puts members of staff or anyone taking part in an activity or event in danger such as:

- Serious and or multiple injuries, illnesses or fatalities
- Hospital treatment for any activity/event participants for serious injuries
- Physical attack of the facility/activity/event participant, volunteer or staff member
- Public demonstration at any location/event.
- Outbreak of food poisoning
- Outbreak of zoonotic disease i.e. E. Coli 0157
- Outbreak of animal disease i.e. Foot & Mouth, BSE
- Pandemic, viral or infectious diseases

Risk Categories

The risk categories cover any situation resulting in an incident, which has or potentially will have significant ramifications for the Authority. These are:

- People,
- Environment,
- Financial
- Reputation,
- Operation or
- Legal Liability

Management of Business Continuity

The following are the main processes and procedures through which the Authority implements its business continuity policy:

- Emergency Action Plans this is the first stage in the emergency response/business continuity process
FIMP for all facilities/services within the Authority, submitted for review yearly and tested regularly the Facility Incident Management Plans (FIMP) this is the next stage in the emergency response/business continuity process
- the Corporate Incident Management Plan (CIMP); this uses a command structure in line with that used by the emergency services following a Gold/Silver/Bronze hierarchy. Separate C3 Event Command Structure will be specifically used during all events and link in with the CIMP.
- Annual Business Impact Analyses to help define recovery priorities for the Authority
- Authority-wide training and support facilitated by RDHS Right Directions and HR (Authority Responsible Officer)
- Application of the standard management method Plan, Do, Check, Act (PDCA) used by organisations such as HSE.

- Adoption of the C3 framework and the Gold-Silver-Bronze or 'GSB' command structure as a clear hierarchical framework and operational clarity for the command of major incidents or disasters.

Business Continuity Risk Assessment

Threats to the Authority business are constantly monitored and reported through the Business Continuity Risk Assessment process by the Heads of Service who will update the Senior Management team on a quarterly basis or in the event of an immediate concern. This is then used to update the Corporate Risk Register. Should the level of risk or nature of the threat change significantly at any time, the Corporate Risk Register will be updated, and mitigating action discussed with facilities/services and the Senior Management Team as appropriate.

Facility/service risks will be monitored using the Business Continuity Risk Assessment Template by the Business Continuity Co-Ordinator supported by the Business Continuity working group. These will be reviewed annually and re-assessed every two years by the Business Continuity Co-Ordinator supported by the Business Continuity working group and the Internal Audit programme.

The purpose of this assessment is to identify those events that have a higher likelihood (higher grade) of adversely impacting operations, to help prioritise the prevention and mitigation strategies.

Disaster Recovery Plans

As part of the Business Continuity process each facility/service will generate a Disaster Recovery Plan which will be monitored by the Business Continuity working group.

There are special requirements with regards to ICT which covers all arrangements for recovery from an incident including the recovery of data and individual servers. This includes having a robust backup process and an alternative emergency location should Myddelton House be put out of action for an extended period. It will be the responsibility of the relevant Corporate Director(s) to initiate the DRP for the facility/service in question.

Facility/service managers will build an action plan to resume operations in the event of a business interruption and to set planning priorities based on how important these functions are to their operations based on their Business Impact Analysis.

Business Impact Analysis (BIA) - this will decide how quickly the function must be resumed before the facility/service is significantly impacted in terms of products, services, reputation and customer base.

Business Continuity Working Group

In order to protect the ability to deliver the Authority's objectives a Business Continuity Working Group will be established. This team is composed of officers across the organisation who will be responsible for creating and supporting an on-going process to evaluate the impact of events that may adversely affect LVRPA, customers, assets or employees.

The focus of the team is to assist Facility/Service managers develop and maintain a plan designed to ensure that our organisation as a whole and their facilities/service, can restore critical functions, and meet responsibilities to our customers and other stakeholders in a manner consistent with our recovery goals.

The Business Continuity Working Group is responsible for the following:

- Organising regular and appropriate staff training and exercises at regular intervals both internally and with other organisations
- Establishing a work schedule and programme deadlines. Timelines can be modified as priorities become defined.

- Considering any specific budget requirements for research, documents, seminars, consulting services and other expenses that may be considered necessary during the plan development process.
- Meeting to review any incidents after the emergency plan has been activated and completed within a maximum of a week after the incident. Review the types of incidents being reported
- Reviewing the Emergency Action Plan (EAP) template and the Facility & Corporate IMP's (incident Management Plan's) with any amendments to the organisation structure, contact details or new legislation.
- Reviewing the Disaster Recovery Plan
- Maintaining a "Test and Exercise Log" containing the details of actual tests including dates and summary of what took place and programme exercises so that all facilities are tested over a period of time,
- Reviewing the Business Continuity Policy and Management Procedures on a yearly basis

The Business Continuity Working Group will meet quarterly to ensure that all processes required for Business Continuity are monitored to ensure they are updated as and when required.

See Appendix A for the Business Continuity Working Group members.

Roles and Responsibilities

The overall responsibility sits with the Chief Executive but the day to day 'operational responsibility' has been delegated to the level of Corporate Director. This responsibility is in turn cascaded through the Authority's management structure and assured and overseen by the Business Continuity Working Group.

Responsibility for localised business continuity matters and planning lies with the Heads of Service group incorporating heads of departments, the heads of divisions/service areas and this will feed into facility/service managers. The Facility/Service managers are accountable for the undertaking and implementation of business continuity measures in their areas.

As a minimum the Authority expects each facility/service to have its own, fit for purpose, Facility Incident Management plan (FIMP) and for that plan to be reviewed and updated at least annually with sign off by the by the Business Continuity Working Group.

Each FIMP must be submitted by the relevant Facility / Service manager to the Business Continuity Co-ordinator annually for ratification by the Business Continuity Working Group. Failure to comply at this level will be noted in the Authority's operational risk register.

The Strategic Roles and Responsibilities are defined within this document (See Appendix B) and will be revised annually to ensure that they fit the strategic objectives of the Authority.

Supply Chain

It is important that the Authority has a list of suppliers that can be called on to provide goods and services in the event of an emergency or crisis. This will be populated by officers for the relevant departments and be maintained by the Business Continuity Co-ordinator and will be managed by the Business Continuity Co-ordinator.

The spending limit on credit cards will be increased so there are funds available during a major incident, and the finance team will support with direct bank transfers where required.

Implementation, testing and exercises

Implementation, testing and exercises will be carried out to ensure that the recovery plan is effective. After an event, periodic review coupled with testing is required. There are many types of tests that can be conducted to help ensure that the plan is adequate, these are listed below.

Training and education - with the assistance of the Business Continuity working group, a training/education programme will be introduced ensuring a comprehensive and holistic approach for all staff to the Business Continuity process.

Testing and Exercises - The Authority will test the Business Continuity plans by means of tests (desktop) and exercises (real time) to ensure the plans are robust and have been updated, where necessary, to reduce risk, mitigate any further impacts on the business and confirm the disaster recovery process is fit for use.

Tests will be conducted in conjunction with external advisors, such as the Authority's Health and Safety support contractor or insurers and should include testing responses of any supply chain providers.

Exercising and Testing

Walkthroughs: Key staff get together and discuss whether the BCP has everything it needs

Desktop scenario: key staff members discuss plan but this time they take a deeper look at specific risks, circumstances or business areas

Time pressured scenario: rehearse a major business incident scenario using timed pressure (e.g. 2 hours) as feed in fresh pieces of information (injects)

Active test in real time: time processed scenario but normal business operations suspended in part or full

Maintenance & Continual Improvement

In order to comply with the Business Continuity Framework, it is essential that both the Policy and any Business Continuity Management Procedures are reviewed annually or after a major incident as defined in the Business Continuity Management Procedure.

Maintenance

Business continuity plans will go through a formal review at least once annually. All facilities and services will be responsible for regularly updating their FIMP's between reviews

All contact details held in the plans will be updated no less than once quarterly or on change of staff by the facility or service manager. *Contact details stored by departments for Business Continuity purposes must comply with data protection.*

Continual Improvement

To ensure continual improvement the Business Continuity Co-ordinator will:

- Ensure the business continuity programme achieves its intended outcomes, directing and supporting individuals as necessary.
- Ensure the resources needed are available (with support from the SMT where necessary).
- Follow-up recommendations from lessons learnt from exercises to ensure they are implemented.
- Ensure internal audits of the programme are conducted and the improvements identified are implemented.

A summary of incidents will be collated by the Business Continuity Co-ordinator and provided to the Audit Committee so they are aware of any actions taken to improve resilience and reduce Corporate Risk.

Supporting Document Index

Document	Location	Version	Author
Emergency Action Plan Template	QMS System	9.0	Facility
Facility Incident Management Plan	QMS System	9.0	Facility
Facility Incident Response Flowchart	QMS System	9.0	H&S
Corporate Incident Management Plan	QMS System	7.0	H&S
Corporate Incident Response Reporting Flow Chart	QMS System	7.0	H&S
GLL and LVRPA Critical Incident Media Protocol	QMS System	1.0	H&S
Business Continuity Management	QMS System	2.0	Activation
Business Continuity Plan	QMS System	2.0	Activation
Business Continuity Risk Assessment	QMS System	2.0	Activation
Risk Register Procedure	QMS System	3.0	Activation

Appendix A – Business Continuity Working Group members

Role	Responsible Officer	Officer Name	Phone	Email
Working Group Chair	Corporate Director	Dan Buck	07956 898619	dbuck@leevalleypark.org.uk
Co-ordination of open spaces and non-LSC requirements and group deputy	Corporate Director	Jon Carney	07715 449325	jcarney@leevalleypark.org.uk
Business Continuity Co-ordinator	Senior Business Support Manager	Justin Baker	07909 000302	jbaker@leevalleypark.org.uk
Co-ordination of IT requirements	Head of IT & Business Support	Simon Clark	07734 021746	sclark@leevalleypark.org.uk
Co-ordination of APMD requirements	Head of Asset Maintenance	Mike Stevens	07909 000320	mstevens@leevalleypark.org.uk
Co-ordination of Property requirements	Head of Property	Marigold Wilberforce	07920 495390	mwilberforce@leevalleypark.org.uk
Co-ordination of H & S requirements	H & S Contractor – Lead Officer	Andy Waters	07496 640143	andy.waters@rightdirections.co.uk
Co-ordination of HR Training requirements	Head of HR	Victoria Yates	07739 852235	vyates@leevalleypark.org.uk
Co-ordination of Communication requirements	Head of Communications	Stephen Bromberg	07793 773540	sbromberg@leevalleypark.org.uk
Co-ordination of Financial requirements	Head of Finance	Keith Kellard	01992 709864	kkellard@leevalleypark.org.uk
Co-ordination of documentation	Business Support Officer	John Holtum	07920 495390	jholtum@leevalleypark.org.uk
Co-ordination of Events	Senior Events and Projects Manager	Sophie Stone	07770 315973	sstone@leevalleypark.org.uk

Appendix B – Strategic Roles and Responsibilities

Role	Strategic responsibility
Authority Members	- Understand and support awareness of business continuity; - Discuss within Audit Committee meetings and act on any issues identified, as required.
Chief Executive	- The overall responsibility sits with the Chief Executive but the day to day 'operational responsibility' has been delegated to the Corporate Director. This responsibility is in turn cascaded through the Authority's management structure and assured and overseen by the Business Continuity Working Group. - Support Authority staff with business continuity roles, within areas of responsibility, to demonstrate leadership and commitment; - Ensure Corporate Directors and Heads of Service meet the business continuity targets; - Provide reports for Audit Committee meetings (3 times per year) and act on any issues identified, as required.
Corporate Directors	- If the department has experienced significant disruption due to a recent incident, discuss operational risk and business continuity in the Senior Management Team/HoS meetings to identify controls and plans to mitigate disruption. - Agree a primary and alternate business continuity co-ordinator, responsible for business continuity within their department as outlined in the Business Continuity Management Procedure. - Ensure venue/service Managers complete their actions (Operational risk assessment, Business Impact Analysis, Business Continuity Plan development, exercises); - Ensure the department has robust business continuity plan(s) which are signed-off; - Ensure all members of the Senior Management Team are aware of their responsibilities in each department's business continuity plan; - Monitor results of plan reviews and exercises.
Venue/Service Managers	- Under the guidance of the Business Continuity Co-Ordinator (through provision of templates and assistance with completion), the venue/service managers will over the course of the year complete and maintain the facility or service; - Bringing department situation reports to Business Continuity Working Group meetings and implementing, communicating and coordinating updates to the facility or service FIMP. - Attend quarterly Business Continuity Meetings - Generally raise awareness of business continuity in the department, including the department FIMP and staff roles and responsibilities in the plan. - Be responsible for the BCP, the BC Risk Assessment, Business Impact analysis and Disaster Recovery Plan. This person will be accountable for undertaking, implementing and ongoing training of staff in relation to Business Continuity measures.
Venue/Service staff	Be aware of and understand the importance of business continuity in the venue/service, including the FIMP.
Health & Safety Contractor	- Provide professional advice and guidance on all Business continuity processes and documentation. - Be actively involved in the Business Continuity process.
Business Continuity Co-ordinator	- Establish and maintain a business continuity management framework and agree Business Continuity Co-ordinator for each department; - Schedule quarterly meeting with the Business Continuity Working Group

	• Ensure the business continuity programme aligns with standards and best practice; • Provide reports to the Corporate Director (Sport and Leisure) and the Audit Committee as necessary. • Ensure the facility/service follows the Business Continuity process and that an incident Management Plan, Emergency Action Plan (EAP) is reviewed and updated.
Head of Communications	• Advising Chief Executive in relation to Media Liaison and Communications • Have a suite of comms statements • Ensure staff are trained on press interviews • Have a list of recorded messages ready to be used in the event of an emergency