Audit Committee, 20 March 2014

Annual Business Continuity test

Executive summary and recommendations

**Introduction**

The HCPC Business Continuity Plan is exercised annually and this took place on 29\(^{th}\) November 2013. The CDT used a set of paper based DR plans to carry out the test response.

Mazars recommended that HCPC move to an electronic plan delivery system sometime in the future.

**Decision**

The committee is asked to discuss the report.

Subsequent to the test, there was widespread flooding in the UK, plus a burst water main in Kennington, which is still disrupting traffic to the A3. HCPC also suffered a Near Miss incident related to drilling activities, suggesting the scenario was rather timely.

**Resource implications**

None

**Financial implications**

None

**Appendices**

Disaster Recovery Exercise

**Date of paper**

5 December 2013
1. The Purpose of the Exercise

On previous exercises, the participants, as representatives from the HCPC’s departments, had normally acted out possible emergency scenarios as they would in a real emergency. These exercises had traditionally been responded to by EMT acting in the lead, with support from their departments.

On this occasion it had been agreed that members of Cross Departmental Team (CDT) be given the opportunity to meet at the recovery centre at New Denham near Uxbridge to allow the Team to discuss the departmental plans together, and consider and act out a possible emergency scenario.

2. Reference documents

Disaster Recovery Plan, Day 1 – PARK HOUSE
Disaster Recovery Plan, Day 1 – PHOENIX Disaster Recovery site near Uxbridge
Business Process Improvement Function
Communications Function
Education Function
Facilities Function
Finance Function
Fitness to Practise Function
Human Resources Function
IT Continuity Function
Policy and Standards Function
Registration Function
Secretariat Function

3. The Exercise

As normal, members of the IT Department arrived at the Centre earlier to test and then set up the relevant IT processes.

Date, 29th November 2013

The scenario

Roy Dunn created the following scenario, having consulted Marc Seale, in advance of the test. The scenario was designed to be slightly different from previous tests, focussing specifically upon the role of members of the CDT.
Following commencement of the supporting engineering works for the extension to the Northern Line, a burst water main rupture has flooded the workings in a localised sub surface gravel bed. This water has moved along the gravel bed, and climbed up through the test drill holes from 2013, eventually reaching the BT pipework carrying telecommunications cables.

Wash out of this gravel bed has resulted in cracks appearing in numerous buildings local to the area of HCPC’s offices, and the Northern line has been temporarily suspended.

The HCPC EMT are in transit to an international Health Regulation Conference in Brazil where most are involved in Key Note addresses as one of the world’s leading Health and Social work regulators.

The period in which the following incidents below take place is during the final week of renewal for the large social workers profession, therefore there are numerous phone calls that need to be answered by the registration department for the renewal of social workers.

The Conservative government has decided to require the regulation of Health Care Assistants, and the Social Care workforce following further high profile incidents. As the government is generally not in favour of additional regulation, it has reluctantly decided on a new model, where by two current regulators can offer regulation services to the new profession. The best regulator (most cost effective) will attract more new registrants for these new professions.

During this period, the Education Department has been working along with the current independent training organisations and the NMC to take on the new “profession” in which many meetings had been arranged to take place at the HCPC with the Heath Care Assistants & Social Care workers to discuss the transfer of the new profession to either the NMC or HCPC. HCPC is the regulator with the lowest fees, so HCPC expect to take the bulk of the new registrants when they transfer.

Lastly, these flooding and associated issues have fallen into place during the time the Finance Department were about to run a 6 month direct debit collection for the Social Workers, thus if the payments are not collected, the business would miss out on a major revenue stream coming into the business.
The flooding incident has coincided with the activities in which the Registration, Education and Finance Departments have deadlines that will cause a chain reaction of problems for other functional departments such as;

*Projects* – Claire Harkin’s team will be slowed down in their project with Education to take on the Social Care workers

*Facilities* – The subsoil damage will result in needing to dig deeper foundations for new buildings, (and consider underpinning existing buildings). This will increase the current budget he has set for the rebuild/refurbishment project.

*IT* – will need to find ways in which they can restore the data from the servers on a different location in order for operations across the business to continue

*HR* – Somebody in the Department will need to find ways to contact the currently injured hearings officers who were spotted injured by the stampede whilst evacuating Kennington tube station.

*HR Partner’s* – There are 30 registration assessors on the way for training at the HCPC and they have not been told about the closure of the business due to the flooding and associated issues.

**The participants**
The following members of CDT or their representatives took part:

Jonathan Jones (Communications), Steve Hall (Facilities), Hayley Graham (HR), Claire Gascoigne (Secretariat and Policy and Standards), Rick Welsby (IT), Daniel Dawit (Finance), Paula Lescott (Education), Dushyan Ashton (Registration on behalf of Richard Houghton), Brian James (Fitness to Practise), John Barwick (Fitness to Practise) and Roy Dunn (Business Process Improvement). Tom Berrie (Business Process Improvement), attended the meeting and to take notes, and Roy Dunn had invited Michael Chinakwe (intern) to attend the exercise to observe.

Paul Nevin (Project Management) gave his apologies.

Participants were forewarned, and asked to assemble in the Business Process Improvement office in 18A Stannary Street at 9:10 am. Marc Seale, as Chief Executive and Registrar, introduced the exercise and Roy Dunn introduced the scenario.

**Initial information for BCM/DR exercise participants: at Park House**

“Transport for London” announce a temporary suspension to the Charring Cross and City Branches of the Northern Line.

*Transport for London*

The drilling machine used for the northern extension to the tunnels has broken into a washed out section that has subsequently collapsed. Pumping out of the ground around the collapse has continued with estimated thousands of tons of gravel and liquefied clay being dumped into
the Thames as the only way of removing the material fast enough to prevent the whole of the subsurface Northern Line flooding.

Local manhole covers have been loosened after flooding

Local news channels have shown reports of telecommunications engineers saying “It looks like someone has put a sandblasting jet down all of the inspection covers and filled the pipework with gravel and clay. Now it is drying out the only way to remove it is to either dig up all of the pipework and replace it, or flood the pipework and hope it softens up, so it can be washed out along the pipes. Either way is going to take months, if not years”

BT and other contractors estimate replacement of the damaged optical fibre and copper cables will take in excess of four months. All cable based communications have failed, and the last overnight back up of NetRegulate did not complete.

Detail on incident

Cracks have appeared in the back of 184 KPR running from the windows up the walls, and continue to propagate. This suggests continuing loss of support in the foundations. The cracks have also been reported to have been seen spreading across local residences across the Kennington area suggesting the foundations in which these buildings where built on are being undermined.

The water mains supplying Kennington are no longer in operation, thus, this has caused a failure of all toilets, bathrooms and kitchens across the area. The Workplace Regulations 1992 states that no business facilities are allowed to be in operation if toilet and washing facilities are not available.

The organisation Thames Water have estimated duration of 3 months to repair the damage as they need to drain out the flooded sub surfaced gravel beds which is time consuming.

During the suspension and the evacuation of the underground tube stations, panic began to arise as people were told the seriousness of this suspension due to the collapsing surface gravel beds. Pedestrians began to push and shove their way off trains and out of the stations which caused many injuries to people. Three Hearings Officers employed by the HCPC have been reported as possible casualties as they have been spotted being trampled on by other rushing pedestrians whilst making their way to work.

The burst water main rupture in Kennington has caused the trains and bus services to be suspended until further notice. People who are in the Kennington area that wish to travel now need to walk to Brixton to travel via cab services, which is away from the northern line engineering works.

Overview of response.

Members of CDT at first held back from making firm decisions in response to the information dribbled through to them. This is understandable in the circumstances, as they are normally removed from this level of decision making and, unlike the Executive Management Team, there is no clear chair or preeminent member. However, most are managers themselves and
with prompting from RPD, two or three individuals in particular, soon recognised that decisions were required rather than just discussion, and that there could be circumstances which put them into this kind of situation. From then on, the group made appropriate reactive decisions, and agreed appropriate actions. It would be worth organizing other, similar exercises, beginning sometime later this year, to give all members of CDT, including those who were unable to be present at this event, more practice in this kind of decision-making.

The CDT members, with a more operational view of the business, were able to validate their decisions easily, based on business requirements.

It would seem likely that a real life event, at an operational level, would be dealt with comparatively easily by CDT, whilst strategic decisions, required around the event may be more problematic.

Decisions would be made, with justifications, and would be carried out on a best endeavours basis. It is likely that sufficient experience may be available within CDT to make reasoned decisions.

Appendix 1

Sequential material provided to the CDT as the incident evolves.

Using iMODUS, a messaging system that can push information to Blackberry devices whilst other mobile phone based communications are down.

BACKGROUND

Weather: wintery conditions with freezing / deep frost overnight

The building work for the Northern Line Extension to Battersea has commenced, and progress has been good. Extensive evaluation of the local geology along the route (over 100 boreholes) has revealed numerous localised gravel beds which are generally saturated with water. However, the drilling project freezes the ground adjacent to where the tunnelling machine is operating to hold back any water that could potentially flood the tunnelling works. In this way tunnelling through the gravel beds is possible. Different technology would be used for the control of flowing water as opposed to fixed water in gravel beds.
A burst water main has flooded workings in subsurface gravel beds. Telecommunications via BT pipework are currently down.

Using the *Disaster Recovery Plan, Day 1 – PARK HOUSE* those present agreed that, with this background information, it would be agreed that the DR plan would be invoked and that all of HCPC’s buildings would be closed and locked, with a notice on all entrances informing staff who have managed to arrive to return home awaiting further information. Should it be appropriate and safe, certain members of staff would be asked to stand outside the entrances also to tell all arriving staff to find their way home.

Participants assembled outside Park House and were asked if they had working mobile phones, devices etc, before they left for the DR centre. If this had been a real incident, they may have had to find alternative routes to the normal route, via the Northern Line, which could be subject to flooding and closure.

They arrived at the centre at 11:45 and assembled in one of the meeting rooms and began working through *Disaster Recovery Plan, Day 1 – PHOENIX Disaster Recovery site near Uxbridge*

**iModus Message** Situation Info #2  Elapsed time 2 ½ hours since incident.

Water has climbed through test drill holes made in 2013 and taken out BT telecoms. Cracks are also appearing in buildings local to the area suggesting unstable foundations

**iModus Message** Situation Info #3  Elapsed time 3 ½ hours since incident.

Northern line has been suspended and evacuation of the tube commences due to the flooding of the underground workings which could spread to the northern line tubes.

Staff could still be arriving at the Council’s offices or stuck on their journey there. They would need to be informed by mobile of the situation and told to return home by any means available. Staff safety would need to be a high priority.

It was commented that, with all of the senior management, including the Chief Executive and Registrar and Council Chair, away, there needs to be clarity as to who would be acting Chief Executive and how their authority would be authenticated.

**iModus Message** Situation Info #4  Elapsed time 3 ½ hours since incident.

Telecoms engineers report clean-up of the pipes may take months, if not years. Replacements of the damaged optical fibre and copper cables will take in excess of four months.

**iModus Message** Situation Info #5  Elapsed time 4 hours since incident.

All toilet, washing and kitchen facilities dependant on the damaged water main in the Kennington area are no longer in operation. No form of water in kitchens and toilets will accessible at the HCPC till the water main is repaired

**iModus Message** Situation Info #6  Elapsed time 4 ½ hours since incident.

Cracks have appeared at the back of 184 and are dangerously spreading. Kennington area being evacuated due to potential building collapses.
The Kennington area will not be ideal for operations to continue, HCPC will need to find temporary accommodation for the next 4 – 12 months.

All of these indicated that the buildings would be closed for some time and that appropriate members of staff would need to begin to seek and find alternative temporary office space immediately. Outgoing phone calls would need to be kept to a minimum because of the very limited phone lines available, and most staff would be informed by mobile phone that, for the moment, they were likely to have to work at home until assigned accommodation. All temporary and agency staff would be laid off.

If this were a real incident, those going to the centre would need to ensure that they had the right of access when they arrived, as this was limited to a very small number of named individuals. It would be likely that at least one of them was with the advanced contingent, but could not be guaranteed. It would also be advisable to authorize the signatures of some of the members of CDT for the circumstances when EMT members were not yet present, for accessing funds.

It was commented that at this point, those present at the centre would need to make arrangements for some food to be provided, to ensure that they sustained their essential energy levels in order to maintain good judgment.

10 Casualties reported, 3 of those are believed to be Hearings officers that were trampled on by the stampede during the evacuation of Kennington tube station on their way to work.

An appropriate person would be assigned to inform relatives.

Due to the Kennington area being unsuitable for operations to take place, businesses may be offered assistance in finding temporary accommodation where possible.

Regarding the proposal to take on new sets of registrants, it was agreed that the Government would be informed that HCPC was not in a position to take part in this tendering exercise.

Participants agreed to go through their copies of their department’s plan and pass any changes and corrections to Tom Berrie or Roy Dunn.