



THE CHIEF CONSTABLE OF CLEVELAND

Business Continuity Planning

Final Internal Audit Report: 4.24/25

9 January 2025

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AUDIT OUTCOME OVERVIEW

In line with our scope, included at Appendix B, the overview of our findings is detailed below.

Background / Why we did the audit

We undertook an audit of business continuity planning as part of the approved internal audit plan for 2024/25. The purpose of the audit was to review the business continuity arrangements in place at the Force, including a review of the provisions in place for the updating and testing of business continuity plans. This also included an assessment of whether they are understood to ensure that the service delivery can be continued in the event of an incident or crisis.

The Force has an overall Corporate Business Continuity (CBP) and 43 departmental area BCPs, which are designed to cover all critical areas of business operations. Each department has an established plan, a Business Continuity Champion (BCC) and overarching plan owner. The Force has a dedicated Business Continuity Manager (BCM) in post to support the Force's overall business continuity approach. The BCC is responsible for liaising with their units and the BCM, who together update and amend their plans to reflect existing practises, functions, contingency measures and changes to key personnel. The BCM is responsible for the wider business continuity framework, including designing and undertaking of plan testing, reviewing and approving on an annual basis, and raising general awareness amongst BCCs and other key personnel.

As part of this review, we spoke with the BCCs for a sample of unit BCPs. The departments interviewed as part of the review were; Custody; Digital Service; Force Control Room; Response Policing; and Scientific Support Unit.

Conclusion: Overall, we found there is an effective and well-designed control framework in place to manage business continuity planning arrangements at the Force, which is operating effectively and being applied consistently. Effective controls included the establishment of up to date BCPs for the Force and departments, completion of Business Impact Analysis (BIA), exercising of the BCPs, and briefings and support to champions among others. Additionally, we noted there is reporting across the Force's governance structure including reporting to the Executive Management Board (EMB) on a quarterly basis. However, we have identified two areas for improvement, resulting in **one medium** and **one low** priority management actions being agreed. These findings related to a full testing schedule for BCPs having been approved in principle by the EMB, but not yet enacted; and ensuring that all staff or officers named as having a role in enacting a BCP have received adequate communications to ensure they are equipped to do so.

Internal audit opinion:



Minimal Assurance



Partial Assurance



Reasonable Assurance



Substantial Assurance

Taking account of the issues identified, the Force can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

Audit themes: Our review identified the following issue resulting in the agreement of **one medium priority management action**:

BCP testing schedule

- The Force has carried out BCP testing in two departmental areas to date in line with ISO certification requirements and has developed a proposed testing schedule to cover the remaining 43 departmental areas, which has been approved by the EMB in principle in July 2024. However, this testing schedule is yet to be enacted. Priorities for testing areas will be based on the BIA residual risk score and any identified emerging risks in departmental areas. We did note that two exercises have been planned, one to be carried out in Autumn 2024 and the second in Spring 2025. The client confirmed that a tactical exercise was completed on 27 November and the outcome of this was due to be produced.

Whilst work is underway to enact a full testing schedule, the current risk of not having a robust testing schedule could leave the Force exposed if BCPs have not been fully tested and are required to be activated in the event of a disaster. We have agreed a medium priority action to ensure thorough testing as part of a follow up process. **(Medium)**

Details of the low priority management action agreed can be found under section two of this report.

We noted the following controls to be adequately designed and operating effectively:

BCP Policy

- The Force has a Business Continuity Policy and a Business Continuity Corporate Plan in place which outlined the key elements of the business continuity and activation process, together with response and recovery actions at appropriate levels (Strategic / Tactical / Operational). The Policy has been approved by the EMB and is in date.

Departmental plans

- Departmental plans are in place and available via the Force SharePoint. These reflect operational activities, including but not limited to what causes disruption among others, people, premises, systems and suppliers. In all five cases sampled, contingencies had been identified and plans had been recently reviewed.

Roles and responsibilities

- We noted roles and responsibilities of key staff have been outlined including the Director of Finance and Assets, EMB, BCM, Departmental Heads and BCCs amongst others, providing staff with clear guidance in the event of a disaster. Through interviews with the BCCs we noted they are aware of their roles and responsibilities; however, isolated instances were identified where roles and responsibilities of staff named on the BCPs, but not involved in the plan drafting, had not been effectively communicated. This resulted in a low priority management action being agreed, outlined in section 2 below.

Approval of the BCPs

- BCPs have been approved or are in the final stages of approval and this process involved the BCC, the BCM and Plan Owner/ Head of Department before publication, with audit trail of approvals retained.

Business Impact Analysis (BIA)

- The BIA was completed for all departments sampled, which ensure essential elements of department functions have been thoroughly considered to draft effective business continuity arrangements. The BIAs identified the business services, critical functions, and IT systems fundamental to the Force, which contributes in reducing a risk of delays in restoring services while decisions are being made during the incident.

Training

- BCCs receive regular business continuity briefings which act as a refresher on the importance of the business continuity and these highlight any emerging trends, legal requirements, roles and responsibilities, the use of the business continuity management system, testing and exercising.

Testing

- We noted that a proposed BC exercising schedule has been developed covering both tactical and operational exercises and has been approved in principle by the EMB in July 2024. This referenced tactical plans testing for 2024-2025, including the national power outage testing which was completed on 27 November and test of the Corporate BCP and pandemic plan in Spring 2025.

Reporting

- There is quarterly reporting to the EMB on progress on BCPs, with emerging risks tracked and noted.

BCC interviews

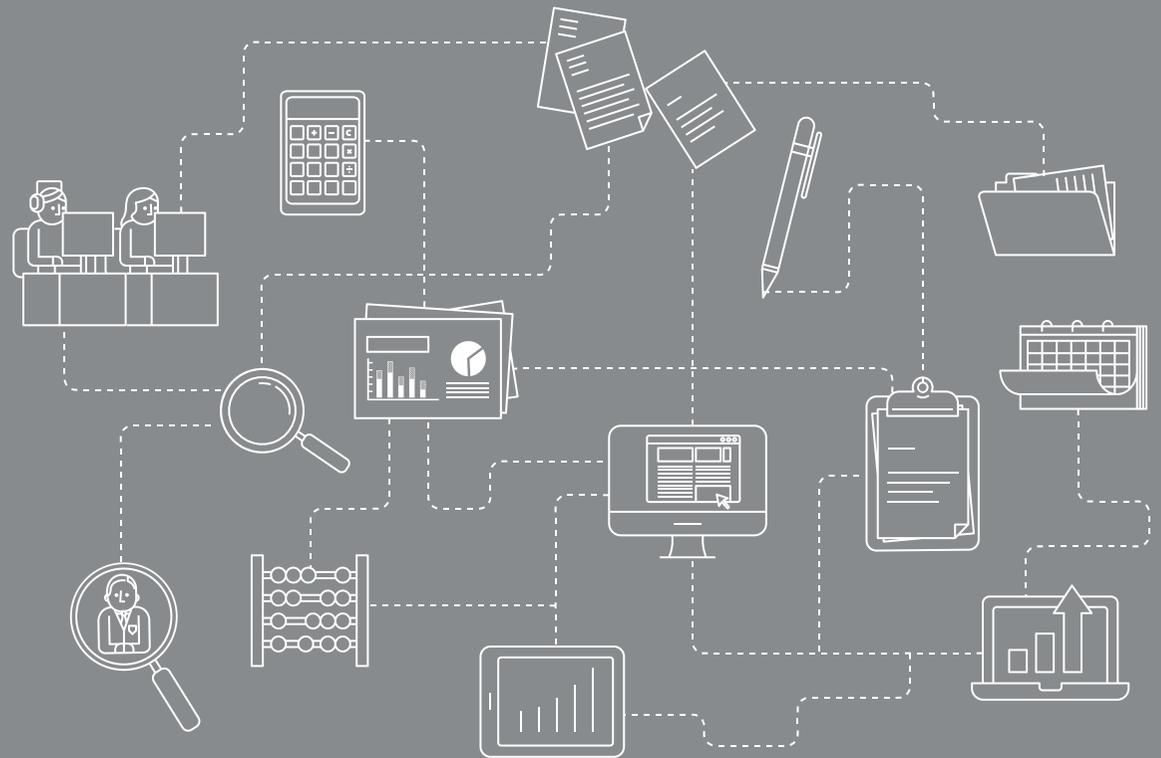
- Interviews conducted with BCCs reflected all were aware of their roles and responsibilities and have been consulted in drafting the recent plans.

Offsite storing of BCPs

- Grab boxes which contain the latest copy of the BCPs are maintained by the BCCs for each department and the latest copies are maintained on organisational laptops as a form of off-site storing.

Summary of Actions for Management

01



SUMMARY OF MANAGEMENT ACTIONS

The action priorities are defined as*:

High

Immediate management attention is necessary.

Medium

Timely management attention is necessary.

Low

There is scope for enhancing control or improving efficiency.

Ref	Action	Priority	Responsible Owner	Date
1	Management will ensure that isolated staff not involved in drafting the plans are regularly made aware of their roles and responsibilities for specific elements of the business continuity plan activation process by the Department Heads and this responsibility to be updated in the Force BCP.	Low	Business Continuity Manager	31 March 2025
2	The Force will ensure that a full risk-based testing cycle priority list has been completed, including an analysis of all departments. This will include testing cycles for the departments listed and be approved and published on the Force's SharePoint system and shared with Department Heads.	Medium	Business Continuity Manager	30 June 2025

* Refer to Appendix A for more detail

Detailed Findings and Actions

02



DETAILED FINDINGS AND ACTIONS

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

Area: Responsibility of business continuity plans (BCPs)

Control	<p>Each of the Force's BCPs outline the roles and responsibilities assigned to key members of staff and officers for actioning steps within BCP.</p> <p>The Department Head is required to communicate and ensure these responsibilities are understood including for isolated staff not involved in drafting BCPs, however this is not currently outlined in the policy.</p>	<p>Assessment:</p> <p>Design ✓</p> <p>Compliance ×</p>
Findings / Implications	<p>We noted through review of the main Force BCP and Departmental Area BCPs that roles and responsibilities of key staff and officers have been outlined, including the Director of Finance and Assets, EMB, BCM, Departmental Heads and BCCs, among others. This provides guidance for those staff and officers involved in enacting business continuity arrangements in the event of a disaster and clearly outlined the members expected to enact the plan, and next guiding steps, including notifications.</p> <p>Through interviews conducted with BCCs for all five departments in our sample, we also noted they were aware of their roles and responsibilities in highlighting any specific department business continuity issues. The BCCs also informed us they received regular briefings and updates in relation to business continuity and are actively in discussion with the BCM.</p> <p>Through further discussion with the BCM, we were advised that mostly key staff required in an activation process are involved in the drafting the BCPs and are aware of their roles and responsibilities. However, there are some isolated cases identified where activation also include personnel not involved in drafting the plans, and the process for communicating to those individuals, ensuring they receive appropriate updates on their responsibilities, could be strengthened.</p> <p>Whilst we appreciate that the BCPs are widely available on the Force's SharePoint for all staff and officers to access and covered during any routine business continuity exercises, individuals key to executing the process should be effectively communicated with to ensure they are aware of their responsibilities, should a plan need to be activated. If the roles and responsibilities for other isolated individuals are not constantly communicated, there is risk that staff may be unaware of their roles and responsibilities regarding BCPs, potentially resulting in incidents being poorly managed and business services being impacted.</p>	
Management Action 1	<p>Management will ensure that isolated staff not involved in drafting the plans are regularly made aware of their roles and responsibilities for specific elements of the business continuity plan activation process by the Department Heads and this responsibility to be updated in the Force BCP.</p>	<p>Responsible Owner: Business Continuity Manager</p> <p>Date: 31 March 2025</p> <p>Priority: Low</p>

Area: Business continuity plan testing

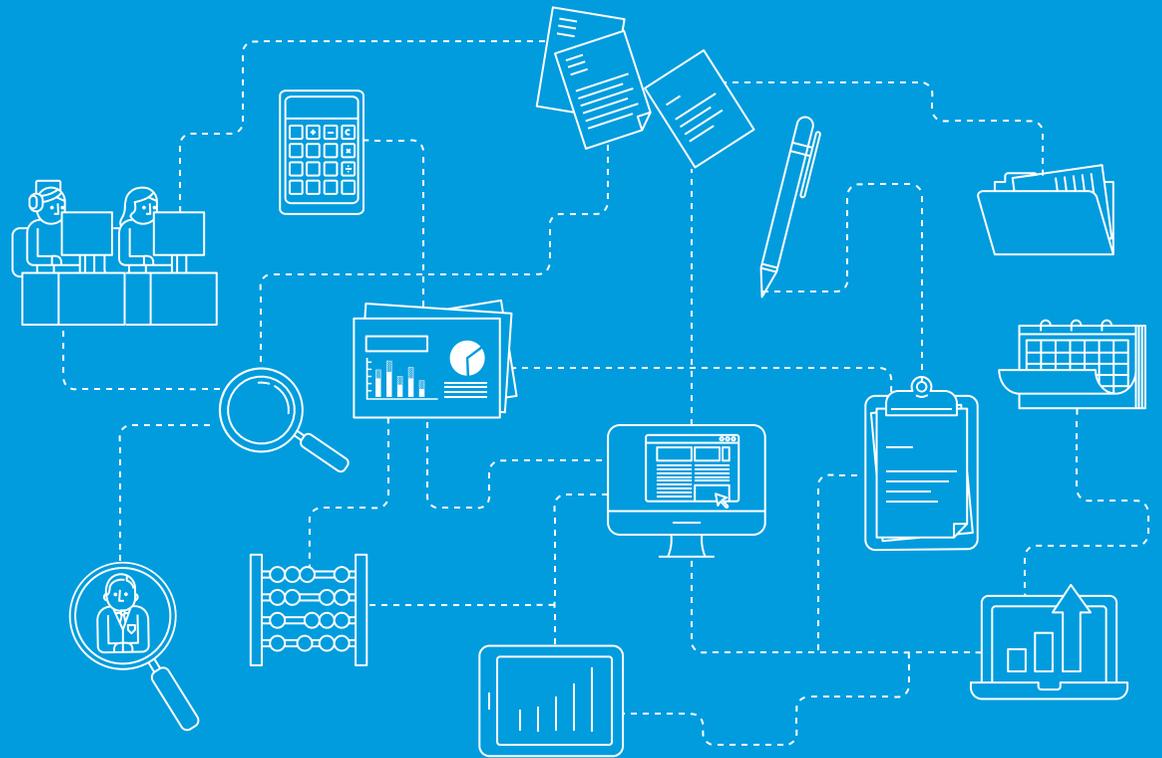
Control	Partially missing control A full testing schedule of all 43 BCPs has been developed to ensure timeframes for testing are established and available and approved in principle by the EMB; however, the testing schedule is yet to be enacted. To date, the Scientific Support Unit and Digital Forensic Unit business continuity arrangements have been tested, as part of their ISO certification. Any test results are retained on file with relevant action plans.	Assessment:	
		Design	×
		Compliance	-

Findings / Implications	We noted through discussion with the BCM, that the Force has plans in place to carry out testing and exercising of the BCPs (in addition to those departments already tested as part of their ISO accreditation in May/June 2024 - Scientific Support Unit and Digital Forensics Unit). However, we noted that a full testing schedule has not yet been enacted.		
	We were advised that a proposed business continuity exercising schedule has been developed covering both tactical and operational exercises of the remaining departments.		
	Through review of the proposed business continuity exercising schedule, we noted this had been approved in principle by the EMB in July 2024 and referenced tactical plans testing for 2024 - 2025 as below:		
	<ul style="list-style-type: none"> Autumn 2024 – national power outage / winter preparedness. Spring 2025 – test of Corporate BCP alongside Pandemic plan. 		
	Through further review this also referenced development of operational testing exercises on the remaining 43 departments with the intention to develop a prioritised testing list based on the BIA residual risk scores in each area and any identified emerging risks.		
	Whilst we appreciate that the testing had been completed on the two departments and testing plans have been approved in principle for the remaining departments, if the process is not completed and actual testing cycles and dates established for the remaining departments, there is a current risk that BCPs in place do not effectively address key business continuity scenarios and could result in an inappropriate response from the Force.		
	We have agreed this management action as medium priority to ensure effective testing of the process at a follow up stage.		

Management Action 2	The Force will ensure that a full risk-based testing cycle priority list has been completed, including an analysis of all departments. This will include testing cycles for the departments listed and be approved and published on the Force’s SharePoint system and shared with Department Heads.	Responsible Owner:	Date:	Priority:
		Business Continuity	30 June 2025	Medium

Appendices

03



APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Low

There is scope for enhancing control or improving efficiency.

Medium

Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.

High

Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non-compliance with controls*	Agreed actions		
			Low	Medium	High
Business Continuity Planning	1 (8)	1 (8)	1	1	0
		Total	1	1	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following area:

Objective of the area under review

Review of the Force's business continuity arrangements for continued service delivery in the event of an incident or crisis.

When planning the audit, the following were agreed:

Areas for consideration:

As part of our review we will consider the following:

- Whether there is an operational business continuity policy and any associated procedures in place. This will include how these are communicated to relevant staff, are kept up to date and approved.
- The development of operational business continuity plans. We will assess the plans for completeness, and whether there are any key sections missing.
- We will interview a selection of business continuity owners as part of this process.
- Within the plans, a reasonable array of business continuity arrangements / potential disaster circumstances is in place covering a broad range of scenarios. This will include review of how the scenarios covered within the plan are identified.
- The approval process for the operational business continuity plans.
- The responsibility for operational business continuity has been clearly assigned to key members of staff / officers.
- Regular reviews are undertaken to ensure that the plans in place remain up to date and fit for purpose.
- Access to business continuity plans are available off-site and reflect the most up to date version.
- Relevant staff and officers are made aware of business continuity arrangements, and whether any dedicated training has been carried out.
- Periodic business continuity tests are carried out.
- Results from tests are reviewed and action plans are developed where appropriate, to improve the processes based on areas of adverse performance.
- Whether there are any dedicated forums for operational business continuity. This will include review of whether regular updates are presented to senior management providing assurance that appropriate business continuity arrangements are in place.

Limitations to the scope of the audit assignment:

- The review will not guarantee that in the event of an emergency the plan will ensure the stability of the operational infrastructure.
- We will not provide assurance that actions identified within the plan are appropriate or that measures stated will actually assist in the objectives which the plan is set out to achieve.
- We will not guarantee that all appropriate individuals have read and reviewed plans in place and that staff fully understand the importance of business contingency planning.
- We will not provide assurance that business continuity plans cover all potential scenarios.
- All testing will be compliance-based sample testing only.
- The results of our work are reliant on the quality and completeness of the information provided to us.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

Debrief held	13 November 2024
Draft report issued	25 November 2024
Responses received	9 January 2025
Final report issued	9 January 2025

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