NHS
North West London

Business Continuity for Primary Care

North West London Integrated Care Board

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Incident Response

In the event of an emergency or incident, **please follow the below:**

1. **Contact the ICB North West London Primary Care Commissioning Team as per your existing processes.**
2. **Call 0333 200 5022 and request a pager message is sent to NWL CP01. This will notify the ICB On-Call team. If they request your pager number, they mean the pager number they want the message to go to.**
3. **The ICB has a single point of contact email address for the System Coordination Centre. Please copy this address into any correspondence sent to the ICB: nhsnwl.scc@nhs.net.**

Notes:

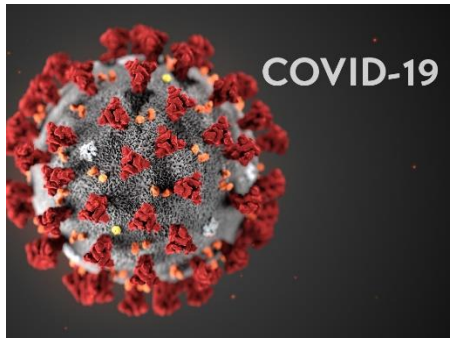
- Please use the following pager format: “Business continuity / Critical / Major incident declared at [your surgery name] please call [your name] on [your number]”
- NHS England are no longer the point of escalation for GP incidents. Any documented processes notifying NHS01 should be removed from plans.

NHS
North West London

Contents

NHS
North West London

Introduction



- The NHS has a legal duty under the Civil Contingencies Act (2004) to plan for, and respond to, a wide range of incidents and emergencies that could affect health or patient care. It also forms part of the Care Quality Commission's essential standards for Quality and Safety.
- These events could be anything from extreme weather conditions to an outbreak of an infectious disease.
- This process ensures that in the event of an incident or emergency any NHS affiliated organisation will be able to:

Effectively and efficiently control emergency pressures, whilst withstanding increases in demand and responding appropriately to the incident or emergency using a predefined action plan that facilitates sufficient post event recovery.

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Incident Definitions (NHS EPRR Framework July 2022)

Business Continuity Incident

An event or occurrence that disrupts, or might disrupt, an organisation's normal service delivery, to below acceptable predefined levels. This would require special arrangements to be put in place until services can return to an acceptable level. Examples include surge in demand requiring temporary re-deployment of resources within the organisation, breakdown of utilities, significant equipment failure or hospital acquired infections. There may also be impacts from wider issues such as supply chain disruption or provider failure.

e.g. Utilities breakdown (burst water pipe, electrical outage), fire, violent crime

Critical Incident

Any localised incident where the level of disruption results in an organisation temporarily or permanently losing its ability to deliver critical services; or where patients and staff may be at risk of harm. It could also be down to the environment potentially being unsafe, requiring special measures and support from other agencies, to restore normal operating functions. A Critical Incident is principally an internal escalation response to increased system pressures/disruption to services

Major Incident

The Cabinet Office, and the Joint Emergency Services Interoperability Principles (JESIP), define a Major Incident as an event or situation with a range of serious consequences that require special arrangements to be implemented by one or more emergency responder. [serious risk of damage to humans, environment or threats/acts of war/terror]

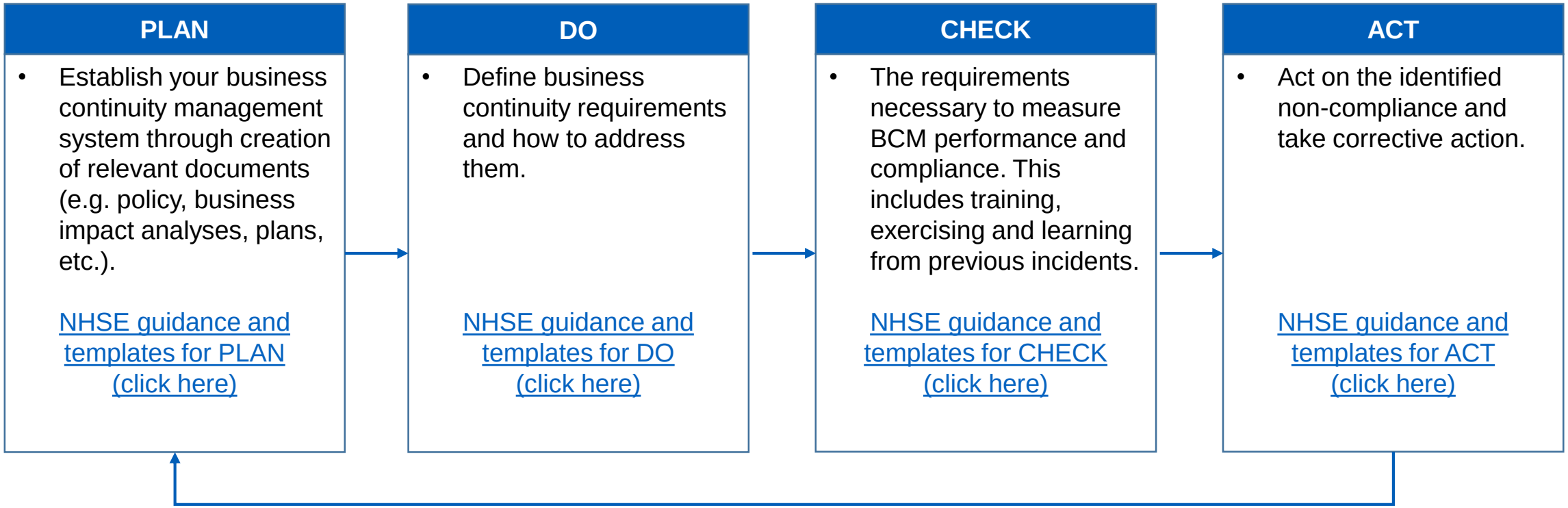
In the NHS this will cover any occurrence that presents serious threat to the health of the community or causes such numbers or types of casualties, as to require special arrangements to be implemented. For the NHS, this will include any event defined as an emergency *e.g. Cyber Attacks/Big Bang (serious RTA, CBRN or HAZMAT explosion/release) – DEPENDS ON SEVERITY*

NHSE EPRR Framework (2022) (click here)

Business Continuity Management (BCM)

Business Continuity Management (BCM) is about identifying essential services and planning ways to ensure these services continue during a disruptive event.

BCM aligns to the Plan, Do, Check, Act (PDCA) cycle. Please click here for overarching NHSE business continuity guidance.



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Step 1: Risk Assessment

It is recommended that you use your existing risk assessment methodologies and systems when reviewing business continuity risks. This process identifies hazards (something with the potential to cause harm) and risks (something that might happen and its effects), decides what harm may occur, provides scoring on impact and likelihood, and allows for robust plans for mitigation.

TABLE 1: CONSEQUENCE AND IMPACT MATRIX

Level	Descriptor	Descriptor
1	Minor	• Injury requiring first-aid treatment or temporary minor illness (<3 days lost) • Minimal environmental implications • Failure to meet (local) departmental standards • Minimal loss of reputation • Moderate financial loss (£1k to £9k) • Minimal business interruption
2	Moderate	• Break of minor bone or temporary minor illness (3-7 days lost) • Moderate environmental implications. • Moderate financial loss (£10k to £49k) • Moderate loss of reputation • Failure to meet organisational standards • Moderate business interruption
3	Serious	• Bone fracture or temporary serious illness (8–21 days lost). • High environmental implications • Major financial loss (£50k to £249k) • Repeated failure to meet internal standards; failure to meet national performance target • Major loss of reputation • Major business interruption
4	Major	• Single death of any person/ Permanent serious illness/ disability • Extreme environmental implications • Extreme financial loss (£250k to £499k) • Intermittent failure to meet national professional standards and/ or statutory requirements • Extreme business interruption
5	Catastrophic	• Multiple deaths involving any persons/ multiple permanent serious illness/ disability • Extreme financial loss (£500k+) • Catastrophic business interruption • Sustained failure to meet national professional standards and/ or statutory requirements

TABLE 2: QUALITATIVE ASSESSMENT OF LIKELIHOOD

Level	Descriptor	Likelihood (over 5 years)
1	Rare	May only occur in exceptional circumstances (<5% chance)
2	Unlikely	Could occur at some time (6-25% chance)
3	Moderately likely	The event should occur at some time (26-50% chance)
4	Likely	The event will occur in most circumstances (51-75% chance)
5	Certain	The event is expected to occur in the next 5 years

TABLE 3: INCIDENT CATEGORY

LIKELIHOOD	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

RISK CATEGORY		
LOW	MEDIUM	HIGH

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Step 2: Business Continuity Policy / Management System (BCMS)

A business continuity management system outlines your organisation's approach to business continuity, this document does not include specific incident response information. Please see below for recommended headings, adapted from the NHSE BCMS template.

Categories			
1	Scope	10	Governance and Audit
2	Objectives	11	Communication
3	Purpose	12	BCMS Review
4	Risk Assessment		
5	Business Impact Analysis		
6	Business Continuity Plans		
7	Training		
8	Exercising		
9	External Suppliers and Contractors		

Step 3: Business Impact Analysis (BIA)

A business impact analysis should be completed for each area of work (e.g. you may divide these by clinic, directorate, building, or function). It is a process of analysing business functions and the effect that a business disruption might have upon them. Please see headings below, as adapted from the NHSE BIA Template.

	Categories
1	**Maximum Tolerable Period of Disruption (MTPD)** – how long a critical service can tolerate disruption before experiencing unacceptable consequences. These can be ranked (e.g. 0 hours, 24 hours, 48 hours, 72+ hours).
2	**Location of service** – building address, alternative work locations, estates provider and contact details.
3	**Staffing Requirements** – how many staff are required to deliver the minimum safe service, clinical skills required, how you could reorganise to prioritise essential services, location of staffing details.
4	**Supplier Lists (Internal and External)** – services / products supplied, supplier names and contact details.
5	**IT and Data Requirements** – business critical software, applications, data sources. Define how a loss would impact you and how you would operate in its absence.
6	**Communication Requirements** – define business critical communications systems and how a loss would impact delivery.
7	**Equipment and Medication Requirements** – list the equipment/medication, provider, contact details and alternatives.
8	**Recovery Time Objectives (RTOs)** – your list of activities ranked by target recovery times and priority for recovery.
9	**Finance** – costs associated with full replacement of associated equipment, infrastructure, staff, fees, etc.

Step 3: Business Impact Analysis (BIA)

PEOPLE

- What number of staff do you require to carry out your critical activities?
- What is the minimum staffing level you could cope with?
- What skills/level of expertise are required to undertake these activities?

PREMISES

- What locations do your critical activities operate from?
- What alternative premises do you have?
- What plant, machinery and other facilities are essential?

TECHNOLOGY

- Is the service dependent on electrical medical equipment?
- What IT is essential to carry out your critical activities?
- What systems and means of communication are required to carry out your critical activities?

INFORMATION

- What information is essential to carry out your critical activities?
- How is this information stored?

SUPPLIERS AND PARTNERS

- Who are your priority suppliers/partners?
- Are key services contracted out?
- Do you have any mutual aid arrangements in place?

Identify which category the activity falls within:	
A	Activities which must be continued
B	Activities which could be scaled down if necessary
C	Activities which could be suspended if necessary

* Adapted from 'Developing Resilient Organisations across the NHS in London' (NHS London)

Step 4: Business Continuity Plan (BCP)

The BIAs produced for each service will now be used to inform the creation of your BCP. This overarching document should be easy to read and clearly define the actions to be taken during a disruptive event. As adapted from the NHSE BCP Templates and Checklists.

Categories			
1	Scope	10	Services Operating from this Site
2	Aim	11	IT and Telephony
3	Objectives	12	Space Availability
4	Roles and Responsibilities	13	Reporting and Debriefing
5	Communications Methods	14	Action Cards
6	Site Risk Assessment	15	Sign Off
7	Internal Plan Activation Triggers	16	Fire Evacuation Procedures
8	Plan Activation and Escalation	17	Lockdown Procedures
9	Activation Key Contacts / Incident Team	18	Any other Appendices

Considerations

WHAT WOULD YOU DO IF...	YOU COULD CONSIDER:	✓
Significant numbers of your staff did not come into work? This could be for a number of reasons including: • transport disruption • sickness epidemic • civil disorder in your area	• Identifying services which could be temporarily suspended while essential services are maintained	
	• Keeping a list of recently retired staff or volunteers who could come in and help	
	• Identifying agencies who provide the type of staff you might need	
	• Setting up mutual aid arrangements with neighbouring practices/pharmacies	
	• Ensuring staff are cross-trained to fill key support roles	
There was significant disruption to your IT systems? This could be for a number of reasons including: • theft of equipment • external (service provider) failure • internal systems failure (virus) • power cut	• Identifying the quickest way to replace equipment – speak to your insurer and make sure you know what to expect	
	• Ensuring you know how to contact your internet service provider in an emergency, and the level of service you can expect	
	• If you outsource your IT, being assured that there are arrangements in place to deal with a major disruption	
	• If you manage IT 'in house', ensuring there are sufficient skills available to deal with a major disruption. If not, establishing contact with a source of expert help	
	• Having a hard copy of key contact details	
	• Regularly backing up information	
	• Ensuring antivirus software and firewalls are up to date	

WHAT WOULD YOU DO IF...	YOU COULD CONSIDER:	✓
You could not use your premises for a period of time? This could be for a number of reasons including: • damage from fire or flood • denial of access by the emergency services due to an external incident such as a crime or fire in a neighbouring property	• Identifying services which could be temporarily suspended while essential services are maintained	
	• Identifying alternative premises where you could temporarily provide a service until normality is restored; even if the range of services needs to be restricted	
	• Establishing mutual aid arrangements with neighbouring practices/pharmacies and working with your commissioner and local council to identify in advance any suitable premises	
	• Identifying how to communicate with customers and key partners in advance	
Your paper records were destroyed or damaged beyond use? This could be for a number of reasons including: • fire • water damage • theft	• Ensuring you have an up to date fire risk assessment carried out by a competent person, and that you have taken all reasonable steps to reduce the risk of a fire occurring	
	• Ensuring that your records are securely locked in fireproof cabinets at the end of each working day	
	• Ensuring that your records are not placed in flood prone areas such as basements	
	• Backing up data regularly and keeping hard copies of key information	

www.fsb.org.uk/thamesvalley/info/community

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