



AGENDA ITEM

3.2.6

CTM BOARD

**CIVIL CONTINGENCIES AND BUSINESS CONTINUITY REPORT
2022-23**

Date of meeting	25/05/2023
FOI Status	Open/Public
If closed please indicate reason	Not Applicable - Public Report
Prepared by	Jason Evans, Emergency Preparedness, Response and Recovery Manager
Presented by	Linda Prosser, Director of Strategy and Transformation
Approving Executive Sponsor	Executive Director of Strategy and Transformation
Report purpose	FOR NOTING

Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals	Date	Outcome
(Insert Name)	(DD/MM/YYYY)	Choose an item.

ACRONYMS

EPRR	Emergency Preparedness, Response and Recovery
EPRRM	Emergency Preparedness, Response and Recovery Manager
CCA	Civil Contingencies Act 2004
PPE	Personal, Protective Equipment
PHW/E	Public Health Wales/England
SWLRF	South Wales Local Resilience Forum

I,P&C	Infection, Prevention and Control
MI	Major Incident
WG	Welsh Government
MERIT	Medical Emergency Response Intervention Team
VHF	Viral Haemorrhagic Fever

1. SITUATION/BACKGROUND

1.1 Cwm Taf Morgannwg University Health Board (CTMUHB) is a Category 1 Responder under the Civil Contingencies Act 2004 and therefore has the following duties placed upon it under this act and must:

- Assess the risk of emergencies occurring and use this to inform contingency planning;
- Put in place emergency plans;
- Put in place Business Continuity Management arrangements;
- Put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency;
- Share information with other local responders to enhance co-ordination;
- Co-operate with other local responders to enhance co-ordination and efficiency; and
- Provide advice and assistance to businesses and voluntary organisations about business continuity management (Local Authorities only).

1.2 This report covers the work and actions of CTMUHB in relation to Emergency Preparedness, Response and Recovery (EPRR) during 2022, aligning with the Annual Return that the Health Board is mandated to submit to Welsh Government.

1.3 Appendix A of this report provides additional detail in relation to the work completed by the EPRR Manager, Assistant Director of Transformation and the Executive Director of Strategy and Transformation to support the organisation's duties as a Category 1 responder.

2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

The Annual report provides an oversight of how CTMUHB is performing against its duties under the Civil Contingencies Act 2004. Specific areas of compliance to note are:

2.1 *Assessing the risk of emergencies occurring and using this to inform contingency planning:*

2.1.1 CTMUHB has demonstrated a reasonable compliance with the need to assess risks through its existing risk assessments and plans and the HB's response to new risks. This includes:

- a. Pre-planning and operational response to instances of industrial action. Utilising data and cross organisational/sector and external partner collaboration to ensure effective pre-plans are in place along with robust strategic, tactical and operational response structures to maintain patient, staff and organisational safety through challenging industrial action periods.
- b. Responding to the publication of findings from the Manchester Arena Inquiry and the implementation of Martyn's Law (See appendix). CTMUHB EPRRM is in consultation with Facilities/Estates leads to ensure organisational compliance.
- c. Working collaboratively via the SWLRF multi agency structures to develop plans to ensure that adequate mortuary provision is in place across the region to maintain dignity.
- d. Response to the notification of adverse weather events, and the subsequent risk assessed activation of HB severe Weather plans.
- e. Contributing to the amendment and update of the SWLRF Community Risk Register through engaging in the evaluation and analysis of risk that has the potential to impact on our services. Work is ongoing with partners to align existing plans and develop additional plans where needed.
- f. Ongoing work for the completion and testing/exercising of a pan Wales Mass Casualties Dashboard.
- g. Following recent Executive attendance at the National Tier 1 Exercise 'Mighty Oak' regarding a notional National Power Outage, the EPRRM is developing cross department plans regarding possible energy insecurities.

2.2 Putting in place emergency plans:

2.2.1 CTMUHB has demonstrated reasonable compliance with this requirement through update/publication of a number of plans ready to form the basis of a range of emergency responses. Existing plans are under review in line with agreed timescales to develop the following:

- The Business Continuity Policy
- Business Continuity Guidance for Managers
- Lockdown Procedural Guidance
- Helicopter Landing Procedures (Prince Charles and Royal Glamorgan Hospitals).
- Bomb Threat and Suspicious Packages.
- Severe Weather –Ice and Snow
- Severe Weather - Heatwave
- VIP visit/attendance
- Pandemic Operational Plan
- Ebola Escalation Procedure
- Viral Haemorrhagic Fever (VHF) – Management of suspected cases Procedure
- Continued further discussion and work on the Emergency Pressures escalation Policy in partnership with operational colleagues

2.2.2 Work has commenced and is ongoing to review plans and address structural changes in relation to revised Care Group Structures within CTMUHB.

2.2.3 An agreed 'Scheme of Work' has commenced to update the organisation's '*Major Incident and Critical Business Continuity Procedural Guidance*'. Cross Care-Group working groups are in place across all acute sites and are revising and developing site specific MI guidance plans to enhance MI response within CTMUHB.

Executive level governance is in place and the EPRRM is working with Acute Site General Manager to ensure a uniformed approach is developed and implemented across the organisation in line with the legislative requirements of the CCA 2004 and WG Guidance.

2.3 Put in place Business Continuity Management arrangements:

2.3.1 Amongst the range of BCM plans that exist within CTMUHB the following are examples of plans that have been activated in 2022-23:

- Provision of assurance through adverse weather occurrences that has included 'Storm Eunice'
- Provision of assurance through periods of Industrial Action
- Health Board support to multi-agency approach for emergency relocation and healthcare provision for Ukrainian refugees
- Addressing issues surrounding increase in instances of Paediatric Strep 'A'
- Addressing security issues surrounding protests in relation to Covid Vaccinations
- Suspected Viral Haemorrhagic Fever Incident – Princess of Wales
- Loss of Electricity Supply – Royal Glamorgan Hospital
- Loss of data due to cable breach – Royal Glamorgan Hospital.

2.4 Collaborative Working

2.4.1 As a Category 1 responder under the Civil Contingencies Act 2004 and to ensure that CTMUHB engages and shares information with relevant partners - CTMUHB have active membership on the South Wales Local Resilience Forum, the Welsh Health Emergency Planning Advisory Groups, the Welsh Health and Social Services Group, Local Authority Planning Groups and a number of other strategic and tactical working and task and finish groups that underpin the above.

2.4.2 Participation in such groups has resulted in the ability of CTMUHB to adopt and take assurance from national plans, such as the National Supply Disruption Plan that is managed by the NHS Wales Shared Services Partnership (NWSSP), future National Health Surveillance plans and processes through Public Health Wales/England. It also ensures that CTMUHB are linked into the development and amendment of Strategic and Tactical regional and national planning, and are updated on emerging risks utilizing shared situational awareness to ensure the best planning and response is in place.

- 2.4.3** CTMUHB has an internal Strategic Emergency Preparedness, Response and Recovery Group, chaired by the Executive Director of Strategy and Transformation. This group brings together representatives of each Care Group with the aim of providing Strategic focus on emergency preparedness response and recovery.
- 2.4.4** Plans are in place to develop a Tactical EPRR Group to underpin the Strategic Group and ensure that lessons identified from local, regional and national incidents and threats are actioned appropriately. The group will also provide robust assurance of BCM planning across CTMUHB.
- 2.4.5** The ethos of developing and embedding EPRR within CTMUHB is ongoing and discussions are ongoing to embed EPRR within operational groups already in place and those emerging following the recent structural review and Care Group implementation.

3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD/COMMITTEE

- 3.1** Work has commenced to update the organisation's 'Major Incident and Critical Business Continuity Procedural Guidance'. Cross Care Group working groups are in place across all acute sites and are revising and developing site specific MI guidance plans to enhance MI response within CTMUHB. Executive level governance is in place and the EPRRM is working with Acute Site General Manager to ensure a uniformed approach is developed and implemented across the organisation in line with the legislative requirements of the CCA 2004 and WG Guidance.
- 3.2** There is a need to ensure that the Health Board's Care Groups continue to develop, review and update plans for their areas and to ensure that risks are evaluated and adequate measures put in place to mitigate the impact of such risks. Plans are in place to develop a robust governance/assurance framework via the Strategic EPRR Group to ensure this is in place and provide relevant levels of support to achieve.
- 3.3** There is a requirement that all Health Board and Care Group plans and guidance align to the relevant standards, ISO 22301 and statutory guidance from WG and NHS Wales. This requires continued significant engagement with internal and external stakeholders.
- 3.4** The Health Board and its nominated responsible person for EPRR must maintain adequate resourcing for EPRR. Plans are in place to theme EPRR within operational level care group meetings and instil

EPRR 'champions' across the organisation to support. In addition it is planned to enhance the resourcing of EPRR within current budgets via increased awareness of planning team members to provide ongoing support across care group and in embedding pan CTMUHB.

- 3.5** There is a need to consider mandating areas of EPRR training i.e. Major Incident Training for those on the on call rota and those involved in the enacting of CTMUHB MI Plans whether site specific or organisational wide. Business Continuity Training for relevant managers, in order that all relevant persons receive training as required under the Civil Contingencies Act 2004, and that training and development meets the required standards under the National Occupational Standards and other statutory guidance from WG and NHS Wales.

4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	There are no specific quality and safety implications related to the activity outlined in this report.
Related Health and Care standard(s)	Governance, Leadership and Accountability If more than one Healthcare Standard applies please list below:
Equality Impact Assessment (EIA) completed - Please note EIAs are required for <u>all</u> new, changed or withdrawn policies and services.	No (Include further detail below) If yes, please provide a hyperlink to the location of the completed EIA or who it would be available from in the box below. If no, please provide reasons why an EIA was not considered to be required in the box below.
Legal implications / impact	Yes (Include further detail below) The Civil Contingencies Act 2004 places legal requirements on Organisations. These powers have been conferred on WG who now have the power to inspect and examine and Organisation's emergency preparedness.
Resource (Capital/Revenue £/Workforce) implications / Impact	There is no direct impact on resources as a result of the activity outlined in this report.
Link to Strategic Goals	Sustaining Our Future

5. RECOMMENDATION

- 5.1** To **note** the Civil Contingencies and Business Continuity annual report.

Appendix A: Civil Contingencies and Business Continuity Annual Report

Major incident and business continuity plans

The Emergency Planning Response and Recovery Manager (EPRRM) role has reviewed key policies and procedures in line with the expectations of the Civil Contingencies Act and Welsh Government expectations, namely:

- The Business Continuity Policy
- Business Continuity Guidance
- Lockdown procedural guidance
- Helicopter Landing Procedures (Prince Charles and Royal Glamorgan Hospitals).
- Bomb Threat and Suspicious Packages.
- Severe Weather –Ice and Snow
- Severe Weather - Heatwave
- VIP visit/attendance
- Continued further discussion and work on the Emergency Pressures escalation Policy in partnership with operational colleagues

Work has commenced to update the organisation's 'Major Incident and Critical Business Continuity Procedural Guidance'. Cross Care Group working groups are in place across all acute sites and are revising and developing site specific MI guidance plans to enhance MI response within CTMUHB. Executive level governance is in place and the EPRRM is working with Acute Site General Managers to ensure a uniformed approach is developed and implemented across the organisation in line with the legislative requirements of the CCA 2004 and WG Guidance.

The EPRRM supports Local Authority (LA) planning groups such as the Event Safety Advisory Groups for each LA within CTMUHB, providing advice and ensuring that HB requirements are factored in to the planning of major events and that information that may affect HB activity is relayed back to the organisation.

The EPRRM is also part of other LA's Emergency Planning forums and has been involved in areas of planning such as:

- Control of Major Accidental Hazard (COMAH) Registered site emergency response planning – Royal Mint
- Landslide (Tips) Response planning
- Prevention of Terrorism through active participation on the LA's Protective Security Preparedness Group

Operational Support

The Executive Director of Strategy and Transformation, deputised by the Assistant Director of Transformation are active participants on the SWLRF Strategic Co-ordination Group. The Assistant Director of Transformation and the EPRRM actively attend the SWLRF Tactical Co-ordination Group meetings. These forums deal with Strategic and Tactical preparedness, response and recovery for the range of issues that can be found on the SWLRF risk register.

The EPRRM also sits on a number of SWLRF sub groups such as the:

- Training and Development group
- Humanitarian Assistance Group
- Severe Weather Group
- Mass Casualties Group

The Executive Director and Assistant Director also sit on other Strategic Groups such as the WG Health and Social Services (Planning and Response) Group. This group provides health surveillance and global and national health information, advice and shares issues and best practice for health and social care partners.

The EPRRM sits on the Welsh Ambulance Service Pre Hospital Group. This group plans the pre hospital response to mass casualty events and the training of HB staff for their duties as Major Emergency Response Team members, along with multi-agency procedures and protocols during such events.

The EPRRM role has supported the ongoing review of the CTMUHB Emergency Pressures Escalation procedure. The purpose of this Escalation procedure is to provide an operational approach to the effective management of capacity, flow and escalation across all areas within CTMUHB.

The EPRRM forms part of the IP&C Strategic Committee and Tactical Cell and has liaised with Infection, Prevention Control Leads on the PPE issues and guidance from WG and PH. The EPRRM is currently liaising with PHW to review the PPE and procedures for dealing with Highly Infectious diseases including Viral Haemorrhagic Fever type diseases, Ebola and SARs.

The EPRRM provides evaluation of meteorological data in relation to the potential impact to the HB operations, impact on HB premises and infrastructure and the impact on staff travel etc. This includes liaison with Facilities, Estates and construction contractors to ensure that weather warnings and response plans are in place.

Training and Development

The EPRRM role has delivered training and development in the following areas:

- Tactical Hospital Major Medical Incident Management and Support Courses
- Major Incident Loggist Courses
- Strategic/Gold level Multi Agency Major Incident protocol and procedural training
- On Call Familiarisation sessions with new Senior Managers on Call.
- Business Continuity for managers.

The EPRRM also co-ordinates multi agency training for senior and executive managers in conjunction with the SWLRF Co-ordinator and provides training support to the roles of the Medical Emergency Response Intervention Team (MERIT) teams, for which CTMUHB in partnership with all HBs across Wales sanctions the provision of trained emergency nurses to assist in the event of mass casualty major incidents.

Exercises/Conferences:

The EPRRM has recently had direct involvement through the SWLRF Training and Exercising Group with the development and delivery of a Tier 1 – National Power Outage Strategic Pan UK Exercise – Exercise ‘Mighty Oak’ involved the notional National Power Outage over a 7 day period.

CTMUHB provided Executive Level Strategic Leads who fully participated in the exercise as part of its Strategic Command and Coordination Group. Identified national and organisational learning from the exercise is currently being utilised to amend and strengthen organisational BCM planning.

The EPRRM has represented the organisation at recent ‘Health Prepared Wales’ health specific conference and at the ‘Wales EPRR Conference’ providing feedback as required.

The Tactical Hospital Major Medical Incident Management and Support Courses have a table top exercise as part of the course. This a mass casualty incident based on a bombing of a shopping mall – CTMUHB training programme ensures that on call Exec/Senior managers are exposed to this exercise.

The EPRRM has developed a no-notice abduction exercise in partnership with the maternity department and facilities colleagues. This exercise has been successfully carried out at PCH on 2 occasions within 2022-23 and is

scheduled to be implemented across all CTMUHB maternity sites during 2023-24.

Martyn's Law

Background -

On Monday 19 December 2022, the UK Government announced enhanced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute to Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017.

Why do we need Martyn's Law -

Throughout the UK we need to improve security and ensure robust, proportionate, and consistent measures at public places to make sure we can better prepare and improve public security, in light of possible future attacks.

The UK Government are aware through engagement with industry that without legal compulsion, counter terrorism security efforts often fall behind legally required activities. The prioritisation, consideration and application of security processes and measures is currently inconsistent.

Who will be in scope –

Premises will fall within the scope of the Duty where "qualifying activities" take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions, temporary events, Places of Worship, *health*, and education.

It is proposed that the Duty will apply to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g., a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

Therefore, premises will be drawn into the scope of the Duty if they meet the following three tests:

- That the premises is an eligible one – i.e., building or event with a defined boundary.
- That a qualifying activity takes place at the location; and
- That the maximum occupancy of the premises meets a specified threshold – either 100+ or 800+

How will it work –

The Bill will impose a duty on the owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by

requiring them to take proportionate steps, depending on the size and nature of the activities that take place there.

Proportionality is a fundamental consideration for this legislation. It will therefore establish a tiered model, linked to the activity that takes place at a location and its capacity:

- 1) **A standard tier** will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.
- 2) **An enhanced tier** will see additional requirements placed on high-capacity locations in recognition of the potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time. This could include live music venues, theatres, and department stores.

Following initial assessment it is likely that CTMUHB premises will be 'within scope' and fall within 'enhanced tier' requirements.

CTMUHB premises will thus require an enhanced security risk assessment and security plan considered to a 'reasonably practicable' standard. This will allow the assessment to balance risk reduction against the time, money and effort required to achieve a successful level of security preparedness - a recognised standard in other regulatory regimes (including Fire and Health and Safety).