

Cronfa Bensiynau Clwyd
Clwyd Pension Fund



FLINTSHIRE COUNTY COUNCIL

**Administering Authority for
Clwyd Pension Fund**

Business Continuity Policy

March 2021

BUSINESS CONTINUITY POLICY

Introduction

This is the Business Continuity Policy ("the Policy") of the Clwyd Pension Fund ("the Fund"), which is managed and administered by Flintshire County Council. The Policy details the Fund's business continuity arrangements.

This Policy establishes the purpose, context, scope and governance of the Fund's approach to business continuity. The aim of the Policy is to reduce the effects of any incident or event that could disrupt activities of the Fund and ensure either the continuation of or smooth return to business as usual.

Flintshire County Council, as Administering Authority for the Fund recognise that effective business continuity management is an essential element of good governance and risk management in the Local Government Pension Scheme ("the LGPS"). It aims to ensure the Fund can continue to meet its legal and regulatory requirements and reduce operational (continuity-related) disruption risk to acceptable levels if the Fund were to experience a business continuity incident.

This Policy sets out the various aspects of business continuity management including how the Fund:

- integrates business continuity management (i.e. through this Policy and the overall governance and framework in place to embed the approach)
- assesses key business processes, what are the Fund's priorities and what are the recovery times and risks in place
- aligns business continuity management with existing risk management processes
- identifies appropriate recovery strategies in the event of an incident
- documents a plan to support recovery of critical business processes and
- undertakes appropriate and regular testing to identify issues and validate assumptions made.

Aims and Objectives

We recognise the significance of our role as Administering Authority to the Fund on behalf of its stakeholders which include:

- around 48,800 current and former members of the Fund, and their dependants
- around 48 employers within the Flintshire, Denbighshire and Wrexham Council areas
- the local taxpayers within those areas.

Our Fund's Mission Statement is:

- We will be known as forward thinking, responsive, proactive and professional providing excellent customer focused, reputable and credible service to all our customers.
- We will have instilled a corporate culture of risk awareness, financial governance, and will be providing the highest quality, distinctive services within our resources.

- We will work effectively with partners, being solution focused with a 'can do' approach.

This Policy is integral to ensuring that the Fund's mission statement and the Fund's key strategic objectives continue to be achieved. In relation to business continuity, our objectives are to:

- Maintain and adapt recovery strategies and testing to be able to deliver business continuity solutions to agreed levels within agreed timescales as set out in the Business Continuity Plan
- Ensure the Fund's business continuity approach encompasses key processes and addresses any continuity issues that may arise allowing the Fund to maintain key services and minimise any negative impact
- Ensure normal operations can be restored as efficiently and effectively as possible following an incident
- Ensure all Pension Fund staff, the Pension Fund Committee, Pension Board, Pension Fund Advisory Panel and other relevant stakeholders (such as advisers and suppliers) understand the Fund's business continuity management approach and their responsibilities in relation to it
- Integrate business continuity management into business as usual activities and the culture of the Fund and regularly review its effectiveness.

Business Continuity Management Approach

In addition to the governance of business continuity as set out in this Business Continuity Policy, the Fund's Business Continuity Management approach is made up of a further four key elements as follows:

Strategic Business Impact Assessment

The Fund's Strategic Business Impact Analysis (SBIA) and risk assessment identify how continuity-related risks are controlled. The SBIA identifies the Fund's critical business processes (i.e. services), dependencies and associated recovery timeframes, leading to the development of appropriate business continuity management solutions.

The SBIA will be reviewed every three years, or on the change of any key dependency (including suppliers) of the Fund or key delivery timescales in line with recovery time objectives, to ensure all relevant continuity-based risks are captured.

Recovery strategies

Recovery strategies are used to identify and select appropriate solutions to determine how continuity can be achieved in the event of an incident. Details of the Fund's agreed recovery strategies will be included in the Business Continuity Plan.

Business Continuity Plan

The aim of the Business Continuity Plan is to identify and document the recovery priorities, procedures, responsibilities, and resources that will implement and support the Fund's management of an incident.

The business continuity plan is a separate document which will be formally reviewed and updated at least annually or whenever there is a significant change in Fund resources or practices.

Testing

Testing is an important aspect of business continuity planning. The Fund will undertake realistic testing exercises in order to ensure the Fund's business continuity objectives can be met, and that the plans and procedures in place for business continuity are appropriate and effective. Testing should help identify issues and validate assumptions made as part of the Fund's business continuity plan. It will also assist in ensuring there is continual improvement in the overall level of resilience. The outcomes from testing should feed into the other elements of the business continuity management system, such as the business continuity plan.

The Fund is committed to the continual, systematic review and improvement of its Business Continuity Management approach.

Responsibility for Business Continuity Management

The Head of Clwyd Pension Fund is the designated individual for ensuring the business continuity management approach outlined in this Policy is carried out subject to the oversight of the Pension Fund Committee and Pension Board. The Deputy Head of Clwyd Pension Fund and the Pensions Administration Manager are responsible for updating this Policy and relevant business continuity documentation.

However, it is the responsibility of all Fund's staff to comply with this Policy and the business continuity management approach of the Fund. Fund advisers and third-party providers will be made aware of this Policy and are expected to be integral in the delivery of the Fund's business continuity management systems.

Monitoring of this Policy

To assist in identifying whether we are meeting the objectives of this policy, regular updates on business continuity matters will be provided to the Pensions Fund Committee. In addition, the Pension Board will consider reports (as required) on testing results and high level findings from exercises undertaken.

Key risks to the effective delivery of this Policy

The key risks to the delivery of this Policy are outlined below. The Pension Fund Committee members and Pension Board members, with the assistance of the Clwyd Pension Fund Advisory Panel, will monitor these and other key risks and consider how to respond to them.

- Changes in any or all of the Pension Fund Committee, Pension Fund Advisory Panel, Pension Board membership, or senior officers mean areas of business continuity management are not identified due to lack of knowledge
- Insufficient resources being available to satisfactorily assess or take appropriate action in relation to business continuity management

- Lack of engagement or awareness of external factors means key risks relating to business continuity are not identified or addressed in a timely manner.

Costs

All costs related to the operation and implementation this Business Continuity Policy are met directly by Clwyd Pension Fund, except where otherwise covered by an agreement with the host authority or one or more external stakeholders.

Approval, Review and Consultation

This Business Continuity Policy was initially approved at the Clwyd Pension Fund Committee meeting on 23 March 2021. It will be formally reviewed and updated at least every three years or sooner if the business continuity management arrangements or other matters included within it merit reconsideration.

Further Information

If you require further information about anything in or related to this Business Continuity Policy, please contact:

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