

Cronfa Bensiynau Clwyd
Clwyd Pension Fund



FLINTSHIRE COUNTY COUNCIL

**Administering Authority for
Clwyd Pension Fund**

Business Continuity Policy

March 2021 June 2024

BUSINESS CONTINUITY POLICY

Introduction

This is the Business Continuity Policy (“the Policy”) of the Clwyd Pension Fund (“the Fund”), which is **which is part of the Local Government Pension Scheme (“LGPS”)** 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 **our 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 **our** 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 We recognise that effective business continuity management is an essential element of good governance and risk management **in the Local Government Pension Scheme (“the LGPS”). We** also believe that the business continuity management approach, and the various elements of it, as set out in this Policy are key internal controls us, and therefore in line with the expectations set out under section 249B of the Pensions Act 2004 which states:

“The scheme manager of a public service pension scheme must establish and operate internal controls which are adequate for the purpose of securing that the scheme is administered and managed—

- a) in accordance with the scheme rules, and**
- b) in accordance with the requirements of the law.”**

The Pensions Regulator also consider this good practice for Public Service Pension Schemes as set out in the Scheme Continuity Planning of the General Code of Practice¹.

Our business continuity management approach, as set out in this Policy, It aims to ensure **we the Fund** can continue to meet **its** legal and regulatory requirements and reduce operational (continuity-related) disruption risk to acceptable levels if **we the Fund** were to experience a business continuity incident.

We recognise that our approach to Business Continuity is reliant on assistance from Flintshire County Council and we seek to ensure that our Business Continuity approach is consistent with the Council’s overall approach.

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

- integrates business continuity management (i.e. through this Policy and the overall governance and framework in place to embed the approach)

¹ <https://www.thepensionsregulator.gov.uk/en/document-library/code-of-practice/the-governing-body/risk-management/scheme-continuity-planning>

- assesses key business processes, what are the Fund's our priorities and what are the recovery times, and the associated risks in place
- aligns business continuity management with existing risk management processes
- identifies appropriate recovery strategies in the event of an incident
- documents a our 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 50,000/48,800 current and former members of the Fund, and their dependants
- around 5048 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 our the Fund's mission statement and our 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 our the Fund's business continuity approach encompasses key processes and addresses any continuity issues that may arise allowing us 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 our Pension Fund staff, the our Pension Fund Committee, Pension Board, Pension Fund Advisory Panel and other relevant stakeholders (such as advisers and suppliers) understand our the Fund's business continuity management approach and their responsibilities in relation to it
- Integrate business continuity management into our 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, ~~our the Fund's~~ Business Continuity Management approach is made up of a further four key elements as follows:

Strategic Business Impact Assessment

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

~~We will review our~~ 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

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

Business Continuity Plan

The aim of ~~the our~~ Business Continuity Plan is to identify and document ~~our the~~ recovery priorities, procedures, responsibilities, and resources that ~~we~~ will implement and ~~will~~ support ~~our the Fund's~~ management of an incident. ~~This will include a specific Crisis Management Team to help respond, recover, resume, and restore operational and supporting activities following an incident.~~

The business continuity plan is a separate document which ~~we~~ will ~~be~~ formally reviewed and updated ~~at least annually or whenever there is a significant change in our Fund resources or practices.~~ ~~This can be found within the administration and finance shared drive, as well as a hard copy located in the Pensions office.~~

Testing

Testing is an important aspect of business continuity planning. ~~We The Fund~~ will undertake realistic testing exercises in order to ensure ~~our the Fund's~~ business continuity objectives can be met, and that ~~the our~~ plans and procedures in place for business continuity are appropriate and effective. Testing should help ~~us~~ identify issues and validate assumptions made as part of ~~our the Fund's~~ business continuity plan. It will also assist ~~us~~ in ensuring there is continual improvement in the overall level of resilience. The outcomes from testing should feed into the other elements of ~~our the~~ business continuity management system, such as the business continuity plan. ~~In addition following any testing or live incident there will be a debrief exercise to allow lessons to be learnt from our response to an incident.~~

~~We are~~ ~~The Fund is~~ committed to the continual, systematic review and improvement of ~~our 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 by our of the Pension Fund Committee and Pension Board. The Deputy Head of Clwyd Pension Fund and the Pensions Administration Manager is are responsible for updating this Policy and relevant business continuity documentation. The Crisis Management Team Lead (as defined in the Business Continuity Plan) is responsible for enacting and following the Business Continuity Plan in the case of an incident.

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

Monitoring of this Policy

To assist in identifying whether we are meeting the objectives of this Policy, we will ensure regular updates on business continuity matters are considered at will be provided to the our Pension Fund Committee. In addition, our the Pension Board will consider reports (as required) on the results of our testing results and high level findings from exercises we undertaken. We will incorporate any lessons learned from any debriefing exercise following either a test or a live incident into the Business Continuity Plan.

We will also ensure that there is a requirement for suitable business continuity arrangements to be in place when contracting with our advisers and third-party service providers. We will also monitor the suitability of their business continuity arrangements periodically.

Key risks to the effective delivery of this Policy

The key risks to the delivery of this Policy are outlined below. Our 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 our the Pension Fund Committee, Pension Fund Advisory Panel, Pension Board membership, or senior officers mean we do not identify areas of business continuity management are not identified due to lack of knowledge
- We have 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 we do not identify, or address in a timely manner, the 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 **we have** with the host authority or one or more external stakeholders.

Approval, Review and Consultation

This Business Continuity Policy was **initially reviewed and** approved at **the our** Clwyd Pension Fund Committee meeting on **23 March 2021 19 June 2024**. **We** It will be formally reviewed **and updated it** at least every three years or sooner if **the our** 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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