

Changes in this version

Board Level Policy

1. Policy Purpose

NHS Blood and Transplant is an NHS Special Health Authority and must by legislation ensure that it is prepared to respond to an emergency. It is directed to coordinate any multi-organisational response through NHS England to ensure that healthcare gives a coordinated response that serves patients.

It is the policy of NHS Blood and Transplant to certify to ISO22301 “Security and resilience - Business Continuity Management Systems - Requirements” to provide a structured framework and auditable standard that supports compliance with all other legislative and government requirements. This policy and associated business continuity documents follow the requirements of ISO22301.

The purpose of this policy is to state the intention of NHS Blood and Transplant (NHSBT) to have a robust Business Continuity Management System (BCMS) which ensures that the organisation can provide a predetermined level of key products and services to the wider NHS and healthcare system in the event of a disruption. Delivery of a Business Continuity Management System will also address the organisation’s resilience requirements in relation to the following guidance, legislation and board approved standards:

- Civil Contingencies Act 2004
- NHS Act 2006
- NHS Emergency Preparedness, Resilience and Response Framework 2022
- NHS Core Standards for Emergency Preparedness, Resilience and Response (EPRR)
- NHS England BC Management Framework
- ISO22301 Standard

2. Scope of Application

This policy applies to all Board members, independent members of Board Committees, staff of all grades (permanent, temporary, contracted, trainees, agency, seconded, bank, joint appointments), self-employed consultants, contractors, sub-contractors, volunteers.

3. Policy statement and detail

NHSBT is a Special Health Authority and an arms-length body of the Department of Health and Social Care with responsibility for the supply of blood, organs, and tissues and raising the quality, effectiveness and efficiency of blood and transplant services as laid out in the NHS Blood and Transplant (Establishment and Constitution) Order 2005 (SI2529:2005).

The organisation provides blood and blood components for England; coordinates organ donation across the UK, collects plasma for fractionation into medicines and provides many specialist products and services including but not limited to tissues, diagnostics, therapeutic services, red cell reagents, haemopoietic stem cells for transplantation and clinical advice. These products and services are provided to customers, in accordance with appropriate

legislation and standards, to directly support patient care.

NHSBT is committed to maintaining a Business Continuity Management System that supports the organisation's core purpose of "saving and improving lives". To do this it is NHSBT's policy to certify its Business Continuity Management System to ISO22301, and through this certification give assurance to the Board and customers that there is a robust system that ensures the continuity of service in the event of a disruption.

The aims of the Business Continuity Management System (BCMS) are to:

- Be relevant to the purpose of the organisation and proportionate to the risks which NHSBT faces
- Ensure that NHSBT remains compliant with legal and regulatory requirements
- Be auditable against the requirements of ISO22301
- Make sure the system is continually improved
- As far as reasonably practicable possible develop a response framework and plans that improves resilience in the organisation

These aims set the framework within which specific annual objectives are set for the BCMS.

4. Roles and responsibilities

The Board will:

- Ensure that the business continuity policy and business continuity objectives are established and are compatible with NHSBT's strategic direction.
- Ensure that the business continuity management system achieves its intended outcome(s).
- Promote continual improvement in business continuity.

The Executive will:

- Ensure that the Accountable Emergency Officer has appropriate authority, resources and budget to direct the portfolio responsible for the business continuity management system and emergency response.
- Ensure that business continuity requirements are integrated into NHSBT's business processes
- Communicate the importance of effective business continuity and conform to business continuity requirements as set out in ISO22301 and NHSBT policy and other supporting documents.
- Direct and support staff to contribute to the effectiveness of the business continuity management system.
- Support other relevant management roles to demonstrate their leadership and commitment in business continuity as it applies to their areas of responsibility.

Chief Executive / Deputy Chief Executive will:

- Ensure that the Accountable Emergency Officer discharges their responsibilities to provide EPRR reports to the Board, no less than annually. NHSBT publicly states its readiness and preparedness activities in annual reports within the organisation's own regulatory reporting requirements

Accountable Emergency Officer will:

- Ensure that NHSBT is properly prepared for dealing with a relevant emergency, can

respond to monitoring related to dealing with a relevant emergency and will provide NHS England with such information as it may require for the purpose of discharging its functions under the NHS Act 2006.

- Ensure that there is a business continuity team staffed with people with appropriate seniority, skills, qualifications and experience to ensure that NHSBT is appropriately prepared to respond to a relevant emergency.
- Ensure that NHSBT and any sub-contractors are compliant with the EPRR requirements as set out in the CCA 2004, the NHS Act 2006, the Health and Care Act 2022, the NHS Emergency Preparedness, Resilience and Response Framework 2022 and the NHS Standard Contract.
- Ensure that NHSBT and any sub-contractors it commissions have robust business continuity planning arrangements in place that align to ISO 22301.
- Ensure that NHSBT and any sub-contractors it commissions has a robust surge capacity plan that provides an integrated organisational response and has been tested with other providers and partner organisations.
- Ensure that NHSBT is appropriately represented by director-level engagement with and effective contribution to any governance meetings, sub-groups or working groups as appropriate.
- Ensure that there is an annual Business Continuity and EPRR work programme, informed by current guidance and good practice, lessons identified from incidents and exercises and identified risks

Executive Directors will:

- Ensure that their areas of business are assessed for criticality and, if deemed critical, that the business continuity processes outlined in MPD800 are followed.
- Ensure that predetermined minimum service levels are defined for the services for which they are responsible, for implementation in the event of a disruptive event.
- Ensure that any change or innovation in their areas of business consider business continuity to ensure that services can respond to an emergency or disruptive event.

Assistant Director Governance and Resilience will:

- Set the annual Business Continuity and EPRR work programme, ensuring that the Accountable Emergency Officer is aware of the latest guidance and best practice.
- Advise the Accountable Emergency Officer of the appropriate resources required to support the BCMS to enable NHSBT to fulfil its statutory and Government directed duties. These resources to include personnel, expertise, equipment and finance.
- Ensure that risk regarding potential disruptive events and the organisation's ability to respond are identified, assessed and recorded in the organisation's risk system.

Head of Business Continuity will:

- Ensure that training is provided for general awareness and to provide those with a role in a response with the knowledge and skills required to respond.

All staff will:

- Be aware of the policy and what this means for the organisation wide Business Continuity System (provided during awareness training)

5. Training and awareness

This policy, the responsibilities outlined in section 4, and its related procedures as laid out in section 7 are supported through mandatory training.

6. Reporting in relation to policy

Oversight for the BC System is provided by the Risk Management Committee (RMC) quarterly and an annual report is submitted to the Audit, Risk and Governance Committee. NHSBT's Business Continuity System is certified to ISO22301.

7. Related policies and procedures

There are two overarching documents for the Business Continuity Systems:

- MPD539 – Critical Incident Plan
- MPD800 – Business Continuity Systems Document

In addition, there are several organisation-wide documents, including a strategic BIA and organisation-wide response plans to specific events, and department will have their own Business Impact Analysis (BIA) and BC Plans.

8. Policy Review and Compliance Monitoring

Element/Activity being monitored	Lead/roles	Reporting arrangements and frequency	Recommendations/actions
Policy review	AEO	Annually at RMC then to Board	
Assurance on Compliance	Head of BC	Quarterly at RMC	
Policy/process effectiveness	Head of BC	Quarterly at RMC	
Breaches	Head of BC	Via Qpulse and quarterly at RMC	

9. Version Control and RACI view

Version	Owner	Approved by and basis of changes	Approved Date	Effective Date	Date of Next Review
1	AD Governance and Resilience	AEO	16/06/2025		18/6/2026
(R) Responsible	CEO				
(A) Accountable	Director of Quality (as Accountable Emergency Officer				
(C) Consultees	Members of the RMC				
(I) Informed	Members of the Business Continuity Oversight Group (BCOG)				