

Essex Pension Fund Strategy Board	PSB 04c
Date: 17 March 2021	

Essex Pension Fund (EPF) Business Continuity Policy and Plan

Report by the Compliance Manager in consultation with the Independent Governance & Administration Adviser (IGAA)

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1. Purpose of the Report

- 1.1 To provide the Board with the new EPF Business Continuity Policy and Business Continuity Plan for approval.

2. Recommendation

- 2.1 That the Board **approve** the new EPF Business Continuity Policy and Business Continuity Plan.

3. Background

- 3.1 EPF feeds into ECC's Business Continuity and Disaster Recovery Plan. This was developed, recorded and maintained on a regular basis utilising an ECC led system, Shadow Planner.
- 3.2 ECC announced during 2019 that Shadow Planner would cease to exist by the end of August 2019 and its replacement would not be in place until early 2020.
- 3.3 Fund Officers undertook to review all EPF led Business Continuity information, including disaster recovery, liaising with EPF Managers, the ECC Emergency Planning and Resilience team along with the Finance and Technology Business Continuity Champion. This enabled a holistic review to be undertaken capturing all dependencies.
- 3.4 As a consequence of the above and in line with the best practice issued by the Good Governance Project to not place over reliance on the Administering Authorities Policies and Systems, the Fund looked to develop its own overarching Business Continuity Policy which links to the:
 - Business Continuity Plan;
 - Business Impact Assessment;
 - Disaster Recovery Plan; and
 - Testing Schedule.
- 3.5 The Board asked the PAB to undertake a review of the Fund's Business Continuity processes which was agreed at the PAB's 25 September 2019 meeting.

4. PAB's review of the Fund's Business Continuity Arrangements

- 4.1 Fund Officers provided a draft Business Continuity Policy with a progress update on the Plan at their 23 September 2020 meeting.
- 4.2 At the PAB's 16 December 2020 meeting, the final draft of the Policy was agreed. After review of the Business Continuity Plan, recommendations for changes were made:
 - to include a communication strategy;
 - to amend the penetration test conductor; and

- to then provide the new Business Continuity Policy and reviewed Business Continuity Plan to the PSB for their approval.

It was also confirmed that the Independent Governance and Administration Adviser (IGAA) had conducted a quality assurance check on the testing schedule.

- 4.3 The new Business Continuity Policy and Business Continuity Plan have been provided at Appendices A and B respectively for the Board's approval.
- 4.4 Once approved, the Business Continuity Policy will be published on the Fund's website however, the Business Continuity Plan will remain an internal confidential paper which now be a live working document.

5. Business Continuity Plan Enacted (Covid-19 pandemic)

- 5.1 Within the Fund's Business Continuity Plan, pandemics already formed part of the Disaster Recovery Plan and was activated in March 2020 following the UK lockdown announcement.
- 5.2 The Fund has continued to maintain BAU operations with the whole Pension team carrying out the majority of their roles from home. Where this has not been possible, a skeleton staff has been attending EPF offices.
- 5.3 Fund Officers have adapted to the new ways of working with negligible impact on deliverables against the Business Plan and Scorecard measures. The Fund's Risk Register has been monitored closely throughout this period and updated as and when required.
- 5.4 The Fund's third-party providers were all able to implement their business continuity plans successfully, with many also transferring their operations to remote working.
- 5.5 The pandemic has given Officers the opportunity to test the robustness of the Plan with a real-life situation.

6. Link to Essex Pension Fund Objectives

- 6.1 Maintaining and updating a complete and comprehensive Business Continuity Plan will assist the Fund in achieving the following objectives:
 - understand and monitor risk and compliance; and

- deliver a high quality friendly and informative service to all beneficiaries and employers at the point of need.

7. Risk Implications

7.1 Failure to develop, review and update the Business Continuity Policy and Plan could result in:

- failure to undertake business as usual service due to events outside of EPF control resulting in loss of service provision;
- failure to administer scheme correctly in line with all relevant Regulations and policies owing to circumstances such as, but not limited to:
 - lack of regulatory clarity;
 - system issues;
 - insufficient resources; and
- failure of governance arrangements to match up to statutory requirements and recommended best practice leads to financial loss and reputational damage.

8. Communication Implications

8.1 The Business Continuity Policy will be published on the Fund's website.

8.2 Other than ongoing reporting to the Board, there are no communication implications.

9. Finance and Resource Implications

9.1 None.

10. Background Papers

10.1 Essex Pension Fund Advisory Board Minutes, 16 December 2020.

10.2 Essex Pension Fund Advisory Board Minutes, 23 September 2020.