
Appendix one – Responses from councils and the Department of Planning and Environment

This appendix includes the formal responses from audited councils to the findings in this report. It also includes a formal response from the Department of Planning and Environment.

Snowy Valleys Council advises that documented business continuity systems were in place for both former councils amalgamated into Snowy Valleys, and that a consolidated business continuity plan was in draft prior to the 2019–20 bushfires. As noted in this report, Snowy Valleys Council did not have a finalised business continuity plan in place during the 2019–20 bushfires (page 29). The referenced business continuity plans of the former councils were not provided to the Audit Office.

Snowy Valleys Council has asserted that a theme from this report is 'a lack of adequate state funding for asset maintenance or resilience work'. This is an opinion of the Council. The report does not comment on the adequacy of State funding arrangements. No NSW Government agencies were subject to this performance audit and the audit does not conclude that there is a lack of adequate state funding for asset maintenance or resilience work.

The Audit Office has carefully considered the Council's concerns and we have concluded that, based on objective facts and evidence provided, the scope of this audit was relevant and the findings remain balanced, accurate and complete as relevant to the scope.

Response from the Department of Planning and Environment



Office of the Secretary

Your ref: D2127678/PA6687

Our ref: A806819

10/02/2022

Ms Margaret Crawford
Auditor-General for New South Wales
GPO Box 12
SYDNEY NSW 2001

Via email: mail@audit.nsw.gov.au

Dear Ms Crawford

Thank you for your letter of 23 December 2021 about the *Performance Audit Report on Local Government business and service continuity arrangements for natural disasters*. I appreciate you providing me with a copy.

The Office of Local Government (OLG) would like to acknowledge the Audit Office's work in undertaking this review and appreciates the opportunity to respond. OLG notes the findings and recommendations that have been made to the Bega Valley Shire Council and Snowy Valleys Council in the performance audit.

Following the release of the performance audit report, OLG will offer its support and assistance to the two councils to implement the recommendations contained in the report.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mick Cassel'.

Mick Cassel
Secretary

Response from Bega Valley Shire Council



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3 February 2022

Ms Margaret Crawford
Auditor-General for New South Wales
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Dear Ms Crawford

Performance Audit – Local government business and service continuity arrangements for natural disasters. Written response from Bega Valley Shire Council (BVSC)

Thank you for your letter dated 23 December 2021 and the opportunity to respond to the Audit Office's report on Local Government business and service continuity arrangements for natural disasters. Council would like to recognise the effort and positive support made by your audit team in conducting this review. We appreciate the opportunity to provide additional context to the outcomes of the report.

Council acknowledges the five recommendations detailed in the report and agrees that our business continuity framework needs to be updated. Specifically, BVSC will improve how we review and instruct our staff in all aspects of business continuity management. We hope that our community never faces the traumatic events of the 2020 Black Summer fires and future plans will go beyond just those interruptions to Council service delivery from external threats.

To provide context, in the last five years the Bega Valley has been significantly impacted by a series of natural disasters. These have included an east coast low, which caused widespread damage along our coastline, extensive flooding and most devastating of all multiple bushfires (e.g., Tathra, Yankees Gap and the Black Summer fires). We experienced unprecedented damage to the built and natural environment, community wide fatigue, economic impacts, mental health challenges and sadly the tragic loss of cherished community members. The combined effects of these natural disasters have impacted our ability to get back to pre-disaster capacity, now further complicated by the pressures of the COVID-19 pandemic. Despite these challenges, Council has continued to improve our systems and processes to ensure a stable and responsive role in the community as a service provider. BVSC demonstrates a continuous improvement culture that saw us learn lessons from how we responded in the face of multiple natural disasters and used this for our response to the COVID pandemic. These factors were outside of the scope of the audit and have not been reflected.

When speaking to the findings and keeping these experiences in mind BVSC takes the opportunity to stress the need for additional funding and support from the State and Federal Governments in assisting Local Councils in NSW enhance business continuity requirements and emergency management more broadly.

As stated above, the natural disasters we experienced have been frequent. During the 2019/20 bushfires, Council's limited resources were considerably depleted as we not only continued service delivery of core functions to the local community (with minimal interruption), but also supported other agencies with personnel, equipment, and expertise. It is important that I acknowledge the support that we in turn received from other Council's, State Government Agencies, Federal

Government, Not for Profit Organisations and individuals as we responded to and recovered from these events. We feel strongly that the report does not reflect the vital role that Council plays in response and recovery, concurrently. We note that during natural disasters this is particularly important when we try to balance our own service delivery, with a legal obligation to support other lead agencies.

Prior to notification that we were the subject of this performance audit, Council was already implementing lessons learned from our response when facing natural disasters. We are pleased that we have supporting evidence that demonstrates we have been managing the pandemic and, as a result, many of the recommendations detailed in the report have already been implemented. We have attached these accomplishments to this letter.

Once again, I would like to thank the Audit Office for undertaking this audit and trust that it will contribute to the sector by providing guidance on administrative practices that may assist other Councils in undertaking their own assessments. We are pleased that our business continuity management system has been tested and hope that the identification of internal controls will assist others to improve their ability to respond when faced with unexpected business interruptions.

As a final note, I take this opportunity to acknowledge and recognise the leadership and staff of BVSC. I am extremely proud of the way my team and our community have risen to the challenges of the last five years in stoically managing the impacts of natural disasters.

Yours Sincerely



Anthony McMahon
Chief Executive Officer

Attachments

1. BVSC Action Plan of recommendations accomplishment

BVSC Action Plan of recommendation accomplishments

No	Recommendation	Status	Comments
1	Complete the update of its business continuity plans and subplans, applying lessons learned from the experiences of the recent natural disasters and other disruptions	Ongoing	Council agrees with the recommendation and an updated draft BCP has been created. This will be tested mid-2022 by a BCP training exercise.
2	Ensure its BCP and BCP subplans are regularly reviewed and updated and contact details are current	Ongoing	Council agrees with the recommendation. To date we have developed a new sub plan format which has been tested during our pandemic response.
3	Improve how it monitors risks, controls and actions, including those for natural disaster impacts and from post incident reviews, and capture that monitoring within its centralised information management system (PULSE)	Ongoing	Council agrees with the recommendation and has commenced updating and entering appropriate business risks into our risk registers which are held in the PULSE system.
4	Implement a schedule to provide regular business continuity scenario training to all staff and implement a system to monitor staff completion of existing online BCP training	Ongoing	Council agrees with the recommendation and BCP testing, and training are documented in the reviewed BCP.
5	Ensure its recordkeeping relating to service delivery during natural disaster events is adequate to inform post-action reviews, provide an audit trail of key decisions and inform future reviews of the business continuity management framework by: a) keeping formal minutes of all key meetings, especially of key decisions made, including around enacting the BCP b) keeping formal records of service delivery and disruptions, including during natural disasters involving a multi-agency response.	Task Complete	Council agrees with the recommendation and this recommendation has been implemented as part of our pandemic response. Specifically, Council has developed (and is currently using) a BCP record of meeting/ briefing sheet to document CMT briefings. This template formally documents key decisions, actions required and service interruptions. These briefing records are captured in BVSC's records management system and all documents are made available to staff via SharePoint.

Response from Snowy Valleys Council

MH:sj
Our Ref: 3153890



2 February 2022

Ms Margaret Crawford
Auditor-General for New South Wales
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SYDNEY NSW 2001

PERFORMANCE AUDIT – LOCAL GOVERNMENT BUSINESS AND SERVICE CONTINUITY ARRANGEMENTS FOR NATURAL DISASTERS WRITTEN RESPONSE FROM SNOWY VALLEYS COUNCIL (SVC)

Dear Ms Crawford

We extend our thanks to the NSW Audit Office for their interest and insight into our business and service continuity arrangements. We value the learnings that we have taken from this audit and will continue the great work that the SVC has been doing to improve its overall resilience to business disruptions, natural disasters, and other unplanned events. I am also grateful for the opportunity to provide a response to the final report in order to provide additional context for the reader.

Analysis of the local government response to the 2019-20 bushfires is welcomed and I hold the sincere hope that important lessons can be learnt from the SVC experience. Our staff and communities have been remarkable in their ability to respond to disasters; the resilience that they continue to demonstrate is extraordinary. The commentary below attempts to capture or highlight important learnings that we feel should be emphasised in this final report.

Snowy Valleys Council in context

The current SVC was formed by proclamation in 2016 and is an amalgamation of the former Tumbarumba Shire and Tumut Shire councils. This has necessitated consolidation of the operations of two separate councils, including ongoing review and alignment of policies, systems and processes. However, much of the existing infrastructure is decentralised and operates as separate discrete networks to supply services to individual towns.

This includes the operations of critical water supply infrastructure. One minor correction from p31 of the report is that the six water treatment plants draw water from multiple catchments, not just the Tumut River, which would not be feasible for supply to the Khancoban township located 100km south, for example.

A point of clarification we would make is that documented Business Continuity systems were in place for both former councils prior to the bushfires however the document was in draft as part of this process of consolidation. Scenario training in 2016 used the previous council systems while the 2018 scenario used the consolidated draft BCP.



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Scope choices limited the probative value of final report

I encourage the reader to understand that during the 2019-20 bushfire response SVC was under the direct authority of other lead agencies. This is important to consider as the other natural disasters identified in this final report did not impact service delivery or require a business continuity response by SVC.

SVC has enacted its BCP, including while it was in draft format, before and after the 2019-20 bushfires. Unfortunately, these were deemed out of scope for the audit. Information within the scope of the audit has typically been superseded but lacks consideration in the report, including the rationale for moving towards a *Protective Security Policy Framework* (PSPF) model for business continuity.

A comparison of the benefits or limitations of different business continuity approaches would have been valuable in this report. The audit against an ISO standard that has not been adopted by SVC may have limited the value of the analysis and findings. Discussion on the rationale and the benefits of the SVC model is largely absent in this final report which I feel would have been of great insight for other councils.

The role of local councils during and after natural disasters

The role of local councils is poorly defined as 'executive support' by the *State Emergency and Rescue Management Act 1989* (the *SERM Act*) and will lead to discrepancies and inconsistencies between different council arrangements. SVC, like many of its peers, provides a range of support for the Local Emergency Management Committee, the Bush Fire Management Committee, the Emergency Operations Centre and a range of other emergency stakeholder groups consistent with the obligations imposed by the *SERM Act*. However, there is no clear definition of where this 'executive support' ends, particularly during an emergency, which led to SVC providing services to other agencies above and beyond its own functions. Greater clarity on the expectation of the NSW government as to the extent to which local government must support other agencies would be beneficial but understandably isn't part of this report.

Another layer of council responsibilities came from the *Rural Fires Act 1997* which requires local government management of assets, procurements and other support to the Rural Fire Service (RFS). This is before the enactment of emergency powers, such as s44 declarations. Once again, these external agencies have an expectation that they simply ask Council and it is our obligation to provide. Regardless of the usual roles of Council we are seen as the 'first port of call' for all requests.

Councils have largely been left to interpret these statutory obligations for themselves but are expected by other agencies to drop everything to help during an emergency. While SVC and our staff continuously acted for the greater good, Council and other agencies lack awareness of the role of council during an emergency. During the bushfires it was the community and the lead agencies that were SVC's priority and had the benefit of this uncertainty, in some cases to Council's detriment.

It would benefit smaller regional and remote councils with limited resources to have greater clarity around what the ambiguous term 'support' entails, especially during emergencies. This would provide councils with greater certainty around identifying and managing their staff that may be called upon to provide support to external agencies and allocate resources accordingly as noted on p26 of the final report. Additionally, it would clearly define legal liabilities to prevent well-meaning people being prosecuted for decisions they thought were their responsibility.

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In addition to the critical functions identified in the business impact analysis (BIA) there were additional critical functions that were delegated to Council. These included running Donation Centres, Evacuation Centres and Recovery Centres. All of these became critical functions that were resourced and managed by Council. These were largely delivered without any training or documented procedures.

Council's own learnings

The learnings from the 2019-20 bushfires have highlighted the importance of maintaining flexibility and leveraging local knowledge. It has also shown our reliance on individuals, and we are working towards mitigating key-person risks in our BCP and regular operations.

A critical consideration of the effectiveness of a business continuity system is the ability for it to adapt to change and to continue to evolve. This is highlighted by the nominated councils having to respond almost immediately to the COVID-19 pandemic after the most significant bushfires in living memory.

While excluded from the audit scope it is also worth recognising the impact of the COVID-19 pandemic and the public health orders on resourcing whilst recovering from the impacts of the 2019-20 bushfires. A significant amount of work has been done to develop, implement and continually improve our 'business-as-usual' as well as business continuity at SVC despite these significant challenges.

Local knowledge in response to disasters

The council relied heavily on the local knowledge of staff during the response to the 2019-20 bushfires. There is an assertion in the report that this knowledge should be captured within the BCP subplans but that is an oversimplification which fails to understand the detail and nuance of the local knowledge that was being relied upon during the bushfires. This included everything from the names of a local farmer who may have a spare generator or the behaviour of weather in a specific valley. Rather than diminish the value of these insights the BCP should recognise that many contingencies will fall outside of the scope of the document.

Local knowledge is more than simply a collection of all the names of local suppliers or procedures. Even during the 2019-20 bushfires these local resources were typically already exhausted by other agencies or responses to other bushfires in other areas of NSW. Resources had to be pulled from much further afield than a BCP subplan would sensibly have to consider.

A BCP subplan or procedure that captures the complete knowledge necessary to respond operationally to the 2019-20 bushfires will be completely inadequate for responding to the COVID-19 pandemic. Especially in specialist fields like water treatment or information technology. Even if this were possible, the document would be so inaccessible as to be completely useless during a crisis and require additional resources to keep the information current. This is in part why SVC has focused on providing solid business continuity principles that can be broadly applied in a range of situations rather than highly detailed documents which may meet the requirements of an audit but are rendered useless in practical application and often ignored during a real disaster event.

The reliance on BCP subplans is overstated

Both the nominated councils recognise that no document would have been sufficient to respond to the magnitude of a disaster like the 2019-20 bushfires which had already exhausted most 'foreseeable' contingencies including generators, fuel supplies, heavy

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equipment or access to fire-fighting water, remembering that the bushfires came at the end of an extended period of drought for most of NSW.

The timing of the bushfires for SVC was noteworthy as it occurred during a period of shutdown over the Christmas and New Year period. This benefited the response as many staff were available from non-critical services, but it also limited access to some key staff who were either isolated by fires or protecting their own properties. If the bushfires had hit twelve months later this key person risk would have been greater with many staff likely to have been unable to cross borders or return due to changing public health order conditions.

A key learning for SVC has been that BCP subplans have been a starting point to coordinate the response. The BCP should establish the cadence and framework for decision makers to implement an agreed organisational response while the BCP subplans act as an aide-memoire.

For example, each water treatment plant is unique due to the requirements of the network it services. This has required a focus on business continuity that uses principles to support operations and management rather than highly detailed and prescriptive response plans. During the Batlow water treatment plant incident SVC also maintained delivery of potable water, either by water tanker or in bottled water supplies, to communities. The draft BCP Subplan for water supply did not consider the availability of significant quantities of donated water or the logistical requirements for warehousing, packing and shipping to communities. Nor is it within the scope of the current BCP Subplan for water supply. Importantly, though, the BCP Subplan doesn't prevent these contingencies being implemented.

Analysis of business continuity arrangements beyond ISO 22301:2019

The report acknowledges the lack of guidance for business continuity management provided to local government and that there are a number of standards and frameworks available. Business continuity arrangements are likely to vary markedly between councils based on skills, experiences and resources available. The objective of the performance audit was 'to assess the effectiveness of the councils' approaches to business and service continuity arrangements for natural disasters'. However, no assessment of the effectiveness of any arrangements outside of the *ISO 22301:2019 – Security and resilience – Business continuity management systems – Requirements* ('ISO 22301:2019') has been provided.

For Parliament and other local government agencies to be properly informed on the effectiveness of these arrangements it is worth considering the outcomes and compare the alternatives that other arrangements may have delivered. While SVC is grateful for insights where it can improve its' systems, we were disappointed to see the final report fail to address these crucial considerations.

It is worth noting that the Federal Government has moved away from requiring agencies to implement ISO 22301:2019 requirements in preference for the PSPF methodology. The SVC is of the belief that the PSPF arrangements are more effective than those outlined in ISO 22301:2019 due mainly to their flexibility and adaptability.

A common theme amongst regional councils has been having BCP subplans dedicated to only a single form of disruption such as a power outage or loss of a building. Such BCP subplans would have utterly failed to manage simultaneous bushfires, loss of communication networks and power outages followed closely by a pandemic. The SVC experience has been that causation of a business disruption has largely been irrelevant in comparison with the ability to assess and respond to the impact.



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As disasters are becoming more complex and often introduce opportunities for secondary and tertiary disruptions there is more value focusing on the critical resources that have been impacted than trying to prepare a BCP subplan for each type of disaster which will undoubtedly introduce inconsistencies, contradictions or confusion.

Significant work has been undertaken to move SVC away from the traditional disaster specific BCP model. We have taken the lessons learnt from business disruption events and have begun moving towards a PSPF model which is largely risk-agnostic, manages complexity and is flexible enough to provide sufficient guidance during an emergency and recovery. The information and data generated during the business impact analysis using the PSPF is also more valuable for management decision making when allocating resources to areas of greatest vulnerability.

It is also worth noting the ability for business continuity systems to be able to scale appropriately and work in seamlessly with other response agencies. The *Australasian Inter-service Incident Management System (AIIMS)* is an approach that is not mentioned in the final report despite both councils identifying the issues involved with being part of multi-agency responses with local, state and federal agencies.

The interactions between various other stakeholder agencies made the management of the bushfires unusual but certainly not unique. Council BCP arrangements should consider the interaction between council's BCP and a multi-agency response as any disruption to local government services will often be linked to these emergency response structures as they may impact on state-significant infrastructure.

Lack of consideration of recovery as an integral part of business continuity

The role of local government in recovery far exceeds the role presented in the final report. The recovery process is ongoing and a critical consideration for business continuity management. This includes managing internal recovery of services and delivering additional services to the community.

As a body of work this has often fallen on local government to resource and facilitate. Community expectations have also increased as we have been the most prominent representative of government in the community.

This has meant a loss of staff resources from other business activities for extended periods or increased 'business as usual' workloads on normal services in the wake of disaster. Many of these consequences are not considered in traditional BCP documents but have major impacts on council operations for extended periods of time following.

We encourage the reader to consider the importance of recovery in more detail in their BCP subplans. This can include additional staffing to clear backlogs of work that have accumulated, changes to supplier availabilities, or additional wellbeing support for staff and community members who may not deal with trauma for many months after a disaster.

Funding for asset resilience

A theme from the final report is a lack of adequate state funding for asset maintenance or resilience work. This funding is often slow to be delivered or only available after a disaster. Funding is often only provided for new assets and the funding arrangements do not factor in resources for ongoing maintenance or resilience work.



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The Service Management Plans (SMP) currently document SVC's approach to manage Council assets proactively and reactively. Asset maintenance programs are perennially limited by the resourcing available so prioritisation must be a consideration for all local governments. For example, the implementation of proactive fire breaks would take staff and equipment away from road maintenance during a peak period of operation and public use. To say nothing of the limited value of firebreaks when the ember attacks were clearing the major dams of the Snowy Hydro system.

Training in key support roles

Training for council staff for roles in the EOC or supporting other agencies is beyond the responsibility of council. Resilience NSW has been tasked with developing role specific training for Local Emergency Management Officers (LEMO) in Recommendation 11 of the NSW Bushfire Inquiry.

During the bushfires Council staff were seconded to many other roles to support the EOC and the RFS without training. The protracted nature of the bushfires exacerbated key-person risks for SVC but also made role handovers very difficult and reliant upon 'on the job' learning.

Frontline responders and community were put at risk to not adequately train LEMOs and other role holders in their roles and responsibilities. Decisions were made by untrained people using the best information and resourcing available. However, if those individuals had made a decision that cost someone in their community their property, or worse, their lives then the psychological harm that individual would have to endure would be very real.

Conclusion

The performance audit process started in March 2021, a year after the 2019-20 bushfires. The final report was delivered to SVC for response in late December 2021. Over the course of ten (10) months of auditing SVC also managed its response to the COVID-19 pandemic, increased cyber-attack attempts, the extensive flooding of its main office building in Tumut and delivered BCP scenario training. These disruptions have been managed with minimal disruption to the community.

It is important to reflect on the significant work and improvements that have been achieved since the bushfires. I welcome the observations of the Audit Office to continue our commitment to improving the resilience of our council and, through us, our community.

Yours Sincerely,



Matthew Hyde
CHIEF EXECUTIVE OFFICER

Enc: Response to the recommendations for Snowy Valleys Council



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Response to the recommendations for Snowy Valleys Council

No.	Recommendation	Status	Comments
1.	Ensure it documents and monitors all disruption-related risks to service continuity, including the risks of natural disasters impacts, and related controls	Complete	<p>Snowy Valleys Council maintains a documented Enterprise Risk Management Framework (ERMF) and records risk registers within the PULSE risk management module.</p> <p>Hazard reduction, as a commonly quoted example for bushfires, is captured in the SVC's <i>Service Management Plans (SMP) Parks and Open Space Maintenance</i>. Stormwater infrastructure is maintained to address risks from flooding in <i>SMP Transport and Drainage</i>.</p> <p>Asset risks are also managed with preventative risk controls including proactive inspection regimes, condition reporting, maintenance prioritisation schedules in the <i>Asset Management Plans</i>.</p> <p>The management of trees is part of SVC's <i>Tree Management Policy</i>, and so on.</p> <p>Reactive controls form part of the risk management approach as defects are reported and inspected before being prioritised for maintenance. In addition, the BCP Subplans and BIA identify contingency controls that can be put into place during a disruption.</p> <p>The Risk Registers are continuously reviewed and updated as risks are identified.</p> <p>The BIA has been completed and is captured in database software</p>
2.	Ensure its BCP subplans are regularly reviewed and updated, and processes and contact details are complete	Ongoing	<p>BCP Subplans have been continuously reviewed in response to post-incident reviews (PIRs) with some currently at v6.0 since October 2020.</p> <p>BCP Subplans are currently being reviewed in response to the COVID-19 PIR.</p> <p>Additional BCP Subplans are being developed for less critical functions as resources are available.</p>
3.	Progress planned actions to increase staff awareness of business continuity plans and responses including by: <ul style="list-style-type: none"> a) implementing BCP awareness as part of induction training b) monitoring staff completion of BCP scenario training c) tracking staff participation in previous disruption events 	Complete	<ul style="list-style-type: none"> a) BCP Awareness training has been incorporated into staff induction training since October 2020. b) PIRs capture the stakeholders who were involved in BCP events including scenario training. c) PIRs capture the stakeholders who were involved in BCP events including scenario training.

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4.	Ensure processes of continuous review and improvement are completed after every disruption event to capture and formalise lessons learned	Complete	<p>PIRs have been completed for all disruption events since implementation of the BCP framework. These are presented to the Safety, Risk & Quality Committee quarterly with minutes being disseminated to the Greater Leadership Team.</p> <p>Lessons learnt are incorporated into BCP subplan reviews and updates.</p> <p>Council manages risk management tasks through the PULSE system and reports on progress through the Safety, Risk & Quality Committee.</p>
5.	<p>Ensure its recordkeeping relating to service delivery during natural disaster events is adequate to inform post incident reviews, provide an audit trail of key decisions, and inform future reviews of the business continuity management framework by:</p> <p>a) ensuring risks, actions, issues and decisions (RAID) logs are used to inform post incident reviews, and lessons learned after disruption events</p> <p>b) keeping formal records of service disruptions and service delivery decisions made by council or communicated to council, including those made during natural disasters involving a multi-agency response.</p>	Complete	<p>a) RAID logs have been used for all disruption events since implementation in October 2020. These have formed the primary record for PIRs.</p> <p>b) Council will take this comment on notice but will assess the operational value of committing resources to data collection in light of the broader disaster response.</p> <p>Council has also completed a Records Management internal audit in 2021. Findings and tasks to be incorporated into Audit Matrix, monitored quarterly by the Safety, Risk & Quality Committee and reported to the Audit, Risk & Improvement Committee quarterly.</p>



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