



Internal Audit Report
The Environment Service
Business Continuity 12 -14
May 2013

Final Report

Chief Executive's Service
Finance Division
Perth & Kinross Council
2 High Street
Perth PH1 5PH

Background and Introduction

This assignment forms part of the Internal Audit plan for 2012/2013 as approved by the Audit Sub-Committee on 27th March 2012. Audit testing for the assignment took place between January and March 2013.

The Council's Business Continuity Management - Incident Management Plan (BCM-IMP) states "the basis of business continuity is the key responsibility of company directors and senior managers to ensure the continuation of essential services at all times and under any circumstances."

The Strategic Policy & Resources Committee (SP&R) meeting of 30th November 2011 approved the BCM – IMP. The plan was introduced to Committee as "the Council's Incident Management Plan, which outlines the procedures to be followed in the event of an incident which threatens to disrupt delivery of the Council's critical services".

The BCM-IMP requires that all Services, Divisions and Sections hold and maintain business continuity plans known as Divisional Recovery Plans (DRPs). There are a total of 199 DRPs and they are intended to contain up to date information including contact details for use should an incident occur.

The responsibility for Business Continuity Management (BCM) arrangements lies with the Health, Safety & Wellbeing Officer in The Environment Service. The audit approach included a review of these arrangements along with their implementation throughout the Council by the examination of Service documentation and by reviewing responses to questionnaires issued to officers in all Services.

Appendix 3 of this report provides a glossary of the acronyms used throughout the report. For clarity within the report, Business Continuity (BC) is the strategic and tactical capability of an organisation to plan for and respond to incidents and business disruptions in order to continue business operations at an acceptable predefined level, whereas Emergency Planning (EP) is the development and maintenance of agreed procedures to prevent, reduce, control, mitigate and take other actions in the event of a civil emergency.

Acknowledgements

Internal Audit acknowledges with thanks the co-operation of the Health, Safety and Wellbeing Manager and Service based staff during this audit.

Control Objectives and Opinions

This section describes the purpose of the audit and summarises the results. A 'control objective' is a management objective that requires the maintenance of adequate and effective internal controls to ensure that it is achieved. Each control objective has been given a rating describing, on the basis of the audit work done, the actual strength of the internal controls found to be in place. Areas of good or poor practice are described where appropriate.

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Control Objective: To ensure the adequacy of procedures to be followed in the event of an incident which threatens to disrupt delivery of Council services.	
<p>Auditor's Comments: In the absence of a policy which defines the scope and governance of the Council's business continuity arrangements, the procedures and arrangements currently in place may not reflect the aims and objectives of the Council.</p> <p>The BCM-IMP, dated July 2011, continues to be the central working document amongst a number of others (including DRPs) and provides a basis for developing (BC) planning. However it does not constitute a policy in that it does not set the Council's BC aims and objectives nor does it detail roles and responsibilities and accountable officers. However it does detail the response structure for invoking the BC arrangements and the arrangements for identifying those responsible for managing the recovery process including the Incident Management Team. However, some staff named in the BCM-IMP have moved post or left the Council.</p> <p>A number of inconsistencies were found in the content and the awareness of the procedures to be followed in the event of an incident which threatens to disrupt delivery of Council services. These findings are further detailed in Appendix 2.</p> <p>Also, while it was noted that one Service had planned to deliver BC training as part of an April 2013 training session, there is no formal Council wide process to identify BC initial or refresher training.</p> <p>The lack of a defined policy and sound, up to date business continuity procedural arrangements diminishes the effectiveness of such arrangements.</p>	
Strength of Internal Controls:	Weak

Control Objective: To ensure the Council's business continuity processes prioritise the recovery of critical services in the event of an incident.	
<p>Auditor's Comments: The BCM-IMP states that the critical staff requirement for recovering critical services has been identified for each work section of the Council. The BCM-IMP doesn't identify these services but refers to a Consolidated Absorption Matrix (CAM) which details them. The CAM makes no direct reference to critical activities, but refers to maximum tolerable outage time in days and essential staff for every Service.</p> <p>While the minimum number of essential staff reported on the CAM reflects 22.8% of the workforce, it does not provide a list of services requiring priority recovery. It is also out of date in that some Services listed on the CAM no longer exist.</p> <p>The failure to explicitly name and prioritise critical services in business continuity processes (for example, those dealing with vulnerable groups) may result in resources being allocated inappropriately in the event of an incident.</p>	
Strength of Internal Controls:	Weak

Control Objective: To ensure ongoing review and testing of business continuity arrangements has taken place.	
<p>Auditor's Comments: While the SP&R report of the 30th November 2011 states that the BCM-IMP had been used successfully on a number of occasions the Service was unable to provide evidence that the arrangements had been tested or invoked. The Service advised the use of the BCM-IMP referred to may have been related to EP responses in support of communities rather than incidents which directly affected continuity of the Council's business.</p> <p>The report also stated that a major review of the BCM-IMP would be undertaken in 2012. The BCM-IMP itself states that it would be reviewed on an ongoing basis with a major revision at the end of each year following a tabletop exercise to validate the existing plan. These reviews or tests have not occurred.</p> <p>The audit revealed errors in the formula in the CAM used to calculate the numbers of staff required to move to temporary locations which resulted in an underestimate of the total numbers. This may hinder the efficient recovery of services in an incident situation.</p> <p>The failure to review and test business continuity arrangements on a regular basis gives rise to the risk that services may not be able to recover from an incident that adversely affects the continuity of the Council's business activity.</p> <p>DRPs have not been fully reviewed or tested in line with the BCM-IMP requirements.</p> <p>The Service provided evidence of their intention to carry out a future test of business continuity arrangements.</p>	
Strength of Internal Controls:	Weak

Management Action and Follow-Up

Responsibility for the maintenance of adequate and effective internal controls rests with management.

Where the audit has identified areas where a response by management is required, these are listed in Appendix 1, along with an indication of the importance of each 'action point'. Appendix 2 describes these action points in more detail, and records the action plan that has been developed by management in response to each point.

It is management's responsibility to ensure that the action plan presented in this report is achievable and appropriate to the circumstances. Where a decision is taken not to act in response to this report, it is the responsibility of management to assess and accept the risks arising from non-implementation.

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Achievement of the action plan is monitored through Internal Audit's 'follow up' arrangements.

Management should ensure that the relevant risk profiles are reviewed and updated where necessary to take account of the contents of Internal Audit reports. The completeness of risk profiles will be examined as part of Internal Audit's normal planned work.

Feedback

Internal Audit welcomes feedback from management, in connection with this audit or with the Internal Audit service in general.

Distribution

This report will be distributed to:

B Malone, Chief Executive

J Valentine, Executive Director (Environment)

B Renton, Depute Director (Environment)

S MacKenzie, Head of Performance and Resources (Environment)

J Symon, Head of Finance

J Handling, Health, Safety and Wellbeing Manager

G Taylor, Head of Democratic Services

P Dickson, Complaints & Governance Officer

External Audit

Authorisation

The auditor for this assignment was D McCreddie. The supervising auditor was D Farquhar.

This report is authorised for issue:

Jacqueline Clark
Chief Internal Auditor
Date: 22 May 2013

Appendix 1: Summary of Action Points

No.	Action Point	Risk/Importance
1	Business Continuity Policy	High
2	Linkage to Corporate Risk Register	High
3	Validation and Testing of Divisional Recovery Plans	High
4	Appointment of the Recovery Manager	Medium
5	Battleboxes	High
6	Business Continuity Risk Scenarios	Medium
7	Incident Manager	Medium
8	Review of Business Continuity Arrangements	High
9	Recovery Locations	High
10	Priority Recovery of Critical Services	Critical
11	Awareness of Business Continuity Arrangements	High
12	Business Continuity Documentation	Medium

Appendix 2: Action Plan

Action Point 1 - Business Continuity Policy

There is no formal, approved Business Continuity Policy (BCP) which reflects the Council's requirements and defines roles and responsibilities.

In the absence of a policy, the key document in developing BC arrangements is the BCM-IMP

The Service provided evidence that a BCP was being drafted.

Management Action Plan

The Service will develop a BCP which will be approved by the SP&R and clearly identify BC requirements, roles and responsibilities. The BCP will subsequently be published on ERIC.

Importance:	High
Responsible Officer:	J Handling, Health, Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	September 2013
Required Evidence of Completion:	Copy of Approved Policy on ERIC

Auditor's Comments

Satisfactory

Action Point 2 - Linkage to Corporate Risk Register

Appendix A to the BCM-IMP states that the concept of business continuity developed in the mid-1980s as a new way of managing business risks.

The Council's Corporate Risk Management Strategy 2012/13, which is integrated with the Council's Corporate Risk Profile, states that risk management "ensures the Council is proactive to risk by anticipating what could go wrong and putting plans in place to respond if the worst-case scenario occurs".

Audit testing revealed there is no evidence that reference was made to the Council's Corporate Risk Profile in developing business continuity management arrangements.

Management Action Plan

The Service will review the Corporate Risk Profile to create a link to Corporate Risks in the BCM-IMP.

Importance:	High
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	July 2013
Required Evidence of Completion:	BCP risks linkage to Corporate Risks

Auditor's Comments

Satisfactory

Action Point 3 - Validation and Testing of Divisional Recovery Plans

The BCM-IMP states that operational responses to incidents affecting Council teams/ sections are detailed in DRPs held by Services and featuring in the Business Continuity Strategy Group (BCSG) SharePoint site. The BCM-IMP requires that DRPs are reviewed at “at least 6 monthly intervals” with Services testing their business continuity arrangements annually through a tabletop exercise.

Sample checking of DRPs and responses from a sample of staff with DRP roles confirmed that that BC arrangements as documented in DRPs are not always being reviewed or tested in line with the BCM-IMP requirements. Staff with DRP roles do not all have access to the BCSG SharePoint site.

The review and testing of DRPs is a vital tool in helping identify potential weaknesses and revealing any learning points. The failure to validate BC arrangements in line with the Council’s prescribed frequency can give rise to the risk that services may not be able to recover in a BC situation. However, the Service advised that the current prescribed review frequency may not be appropriate in relation to the criticality of services and the number of DRPs is also in need of review. This has been identified as a priority for review.

Management Action Plan

- 1) Once the BCP (Management Action Plan 1 refers) has been approved, the BCM-IMP will be updated to identify the Council’s critical services. These critical services will thereafter be placed into levels of priority with realistic time scales for reviews and tests. The BCM-IMP will also detail the review and test requirements.
- 2) Procedural guidance relating to the upkeep and maintenance of DRPs will be written and approved by the BCSG. This guidance will include the need to ensure appropriate access to the BCSG SharePoint site for those with DRP roles; a requirement to ensure that DRPs are complete, up to date and are held on the BCSG SharePoint site and a requirement to utilise the version control system and the Head of Service sign off page.

Importance:	High
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	November 2013
Required Evidence of Completion:	1) Updated BCM-IMP detailing critical services. 2) Procedural DRP guidance.

Auditor’s Comments

Satisfactory

Action Point 4 - Appointment of the Recovery Manager

The BCM-IMP states that the Recovery Manager will be nominated in each DRP, will normally be the Team Leader of the displaced team and will be appointed on the day of an incident.

The BCM-IMP further details that, during an incident, the Incident Management Team will receive regular updates from the Recovery Manager(s) with the stated source of this information being from DRP contact lists. Audit testing of 6 such contact lists revealed that only 3 lists contained DRP contact information.

The uncertainty as to the appointment of a Recovery Manager and the appointment of such on the day of an incident may give rise to the risk that an individual is appointed without the appropriate training, skills or understanding of their responsibilities. This could lead to confusion and time being lost at the time of an incident.

Management Action Plan

The BC roles and responsibilities including that of the Recovery Manager will be reviewed as part of the implementation of the BCP as detailed in Management Action Plan 1.

Thereafter the BCM-IMP and DRP guidance will be issued to clarify the identification of the person(s) responsible for recovery in a business continuity situation.

Importance:	Medium
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	November 2013
Required Evidence of Completion:	Guidance stipulating person(s) responsible for business recovery.

Auditor's Comments

Satisfactory

Action Point 5 - Battleboxes

DRPs contain a 'battlebox' section which refers to a repository for essential documents and resources which will be accessed upon occurrence of an incident to assist in maintaining service continuity. Audit testing revealed different DRP templates were being used with only 4 of 6 DRPs checked stipulating that all items which staff use to help them do their jobs be copied and included in the battlebox and the contents checked once a week. The remaining 2 DRP templates failed to stipulate these requirements. None of the DRPs stipulated where the battleboxes should be stored.

Analysis of responses returned to the Auditor in relation to questionnaires issued to those with named roles in DRPs, further revealed variations in the frequency of checking battlebox contents.

The lack of consistency of battlebox information and failure to stipulate where the box should be stored may lead to delays in the event of a recovery situation.

Management Action Plan

The Service will review the Divisional Recovery Plan template and the associated battlebox requirements.

Guidance will thereafter be issued to clarify battlebox requirements such as checking requirements and storage location and the DRP template updated accordingly.

Importance:	High
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	February 2014
Required Evidence of Completion:	Revised DRP Battlebox template/guidance

Auditor's Comments

Satisfactory

Action Point 6 - Business Continuity Risk Scenarios

Audit testing of BC arrangements detailed in a sample of 6 DRPs reviewed revealed the DRPs don't provide guidance on the different types of possible BC risk scenarios, such as power loss, unavailability of key staff, loss of entire building or loss of only a few desks.

Some DRPs refer to short, medium and long term staff shortages and the priority order for the delivery of services but these sections were incomplete.

The lack of guidance relating to potential threats and/or various business continuity risk scenarios may lead to the risk of an inappropriate response to an incident. The DRP template is a "one size fits all document." Because of its inherent lack of flexibility and the lack of guidance on completion, it may be a challenge to complete and thereby fails to be an effective tool for anticipating and addressing the range and type of threats posed in a properly prioritised fashion.

Management Action Plan

The Service will review the business continuity templates and consider the use of different Divisional Recovery Plan templates for critical services and for non critical services. The revised templates will detail different business continuity risk scenarios.

Importance:	Medium
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	December 2013
Required Evidence of Completion:	Revised DRP templates and guidance

Auditor's Comments

Satisfactory

Action Point 7 - Incident Manager

The Council's BCM-IMP stipulates that the Incident Management Team, led by the Incident Manager will be the focal point for the corporate response during a BC incident. The Incident Manager is responsible for making the decision to invoke BC arrangements.

10 questionnaires seeking information regarding BC arrangements were issued by Internal Audit to those with roles in the BCM-IMP but only 3 were returned. As a result proper analysis of these responses was impractical.

Analysis of 10 responses to 11 questionnaires also issued to staff named in DRPs, which support the BCM-IMP revealed only 2 respondents were aware that the Incident Manager was responsible for invoking BC arrangements. Further analysis of the responses revealed inconsistencies as to whom respondents would contact if a potential incident was discovered.

Management Action Plan

(1) BC roles and responsibilities will be reviewed as part of the BCP detailed in Management Action Plan 1.

(2) A greater awareness of BC arrangements will be addressed through the Management Action Plan relating to Action Point 11.

Importance:	Medium
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	(1) September 2013 (2) See Action Point 11
Required Evidence of Completion:	(1) Documented roles and responsibilities relevant to incident management

Auditor's Comments

Satisfactory

Action Point 8 - Review of Business Continuity Arrangements

The covering report to the BCM-IMP dated 27th July 2011, which was submitted for approval to the SP&R on the 30th November 2011, states that a further major review of the plan would be undertaken in 2012. The BCM-IMP itself states it “will be reviewed on an ongoing basis with a major revision at the end of each year, following a tabletop exercise to validate the existing plan”.

Audit review in February 2013 revealed no evidence that the above reviews had taken place. The existing BCM-IMP remained the version dated 27th July 2011 although some of those named in it have left the Council or occupy other posts.

In addition, while the covering report to the SP&R states that the BCM-IMP was “used successfully on a number of occasions” and the BCM-IMP requires the decision to invoke BC procedures to be minuted allowing a full audit trail, the Service was unable to provide documented evidence of the invocation or testing of the BCM-IMP.

The Health, Safety and Wellbeing Manager advised the incidents referred to in the SP&R report were likely to have been EP responses as distinct from BC arrangements. This emphasises the need to ensure clarity in the terminology used as referred to in Action Point 1.

The Service provided evidence of their intention to carry out a future exercise that would test business continuity arrangements.

Management Action Plan

The BCM-IMP will be updated to ensure that those named in the plan are still employed by the Council in appropriate roles. The BCM-IMP will be reviewed in line with the requirements of the approved business continuity policy referred to in Management Action Plan 1.

The updated BCM-IMP will stipulate an updated timetable for validating BC arrangements.

Importance:	High
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	November 2013
Required Evidence of Completion:	Updated BCM-IMP aligned to policy including revised validation timetable.

Auditor's Comments

Satisfactory

Action Point 9 - Recovery Locations

Locations for staff to relocate to following an incident are recorded in the CAM which is stored on the BCSG SharePoint site.

Many of these recovery locations show Pullar House sections relocating to 2 High Street and vice versa. These locations infringe the 500m radius also held on the BCSG SharePoint which stipulates the evacuation sites for 2 High Street and Pullar House are the AK Bell Library and Bells Sports Centre respectively.

Audit testing revealed further inconsistencies in the recovery locations named in DRPs held on the BCSG SharePoint site and the locations on the CAM. The Auditor was unable to fully test the extent, as the CAM is listed per section, division or Service with some DRPs not detailing this information. Sample testing of the CAM "Building Summary" section, detailing information relating to staff relocating to "temporary locations," revealed that it was in need of review as it contained omissions and included the former Corporate Services Division which disbanded in 2009.

Audit testing also found errors in the formula used in calculating the total numbers of recovery staff moving to temporary locations. Narratives were included in columns intended for numeric values. This resulted in an underestimate of the stated total numbers of staff moving to the temporary location. This may mean that in the event of an incident the recovery site cannot cope with the numbers of staff seeking accommodation. The "accumulated totals" spreadsheet was also blank.

The failure to validate the CAM data, ensuring it is up to date and in line with the BC arrangements, may result in the inability for the business to recover quickly in an incident situation.

Management Action Plan

The CAM will be revised to include only critical services (see the Management Action Plan in relation to Action Point 10) The relevance of the 500m recovery location radius will be reviewed and the CAM updated to reflect the outcome of this review as approved by the BCSG.

Importance:	High
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion	November 2013
Required Evidence of Completion:	Updated CAM detailing critical services and revised 500m radius guidance.

Auditor's Comments

Satisfactory

Action Point 10 - Priority Recovery of Critical Services

The BCM-IMP details the procedures to be followed in the event of an incident which threatens to disrupt the Council's critical services. The BCM-IMP states "each section has identified the critical staff required to recover their critical processes". Appendix D of the BCM-IMP states that the CAM details critical processes.

The CAM doesn't refer to critical processes but, instead, to 'maximum tolerable outage' and essential staff. The CAM reports the minimum number of essential staff at 22.8% of the workforce.

The BCSG SharePoint site refers to the Council's 'five designated essential services', but these are not named or prioritised in the CAM or the BCM-IMP.

The lack of consistency in terminology may lead to misinterpretation in a recovery situation. while failure to specifically list critical services may lead to the loss of time and/or the allocation of inappropriate resources in a recovery situation.

Management Action Plan

1) The Service will conduct a business impact analysis to help identify critical services. As per the Management Action Plan in relation to Action Point 9 the CAM will be reviewed and updated to detail critical services and the minimum number of essential staff reviewed accordingly. The CAM will be reviewed for accuracy and consistency of information and terminology used. The revised CAM will be approved by the BCSG. As per the Management Action Plan in relation to Action Point 3, the BCM-IMP will be updated to name the critical services.

2) The Service will ensure details of critical services are detailed in the updated BCM-IMP and aligned to the BCP as referred to in the Management Action Plan in relation to Action Point 1. For non critical services a list of options will be prepared for management decisions during a business continuity incident.

Importance:	Critical
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion	November 2013
Required Evidence of Completion:	1) Updated CAM detailing critical services and revised numbers of essential staff. 2) Updated Checklist

Auditor's Comments

Satisfactory

Action Point 11 - Awareness of Business Continuity Arrangements

Appendix A of the BCM-IMP stipulates that all Council staff must be fully aware of what is contained in their BC arrangements. However, neither ERIC nor the employee induction checklist refers to BC arrangements.

The template used for the majority of DRPs states the DRP should be sent to the Business Continuity Manager and that any changes should be made only with his agreement. However, it is difficult for staff to identify the Business Continuity Manager as this title is not detailed on ERIC or the BCM-IMP. The Health, Safety and Wellbeing Manager advised that he is responsible for the Council's BCM arrangements.

Some BC training has been delivered to staff with BC roles although there is no formal oversight process to ensure that BC awareness or training is up to date nor to identify BC training needs.

Audit review of BC training slides revealed they were dated February 2009, failed to refer to the BCM-IMP and named as the Business Continuity Manager an individual who left the Council's employment 3 years ago.

Management Action Plan

Following the introduction of the BCP referred to in the Management Action Plan in relation to Action Point 1 the Service will ensure an ERIC page is created that includes the BCP, details the BC management duties of the Health, Safety and Wellbeing Manager and provides further information to raise awareness of BC arrangements and training links. The Council's induction programme will be updated to refer to this ERIC page.

A review of business continuity training will be undertaken by the Service to include general awareness training and specific training for Service Managers and Heads of Service in identified 'critical' services.

Importance:	High
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	December 2013
Required Evidence of Completion:	Updated ERIC page and induction checklist

Auditor's Comments

Satisfactory

Action Point 12 - Business Continuity Documentation

Audit review of the BCM-IMP revealed various deficiencies:

- The first stage of the flowchart in paragraph 2.2 of the BCM-IMP relates to a member of staff contacting the Depute Director and/or Head(s) of Service regarding an incident. However, the BCM-IMP fails to stipulate how staff are made aware of this requirement.
- The flowchart referred to above conflicts with the first stage of a flowchart in Appendix B to the BCM-IMP which states that the Emergency Services or Council staff etc. inform the EP Duty Officer/Health and Safety Wellbeing Manager or other PKC officer of an incident. The BCM-IMP doesn't name the EP Duty Officer nor are any details given as to how staff are made aware of this routine.
- Neither flowchart states who authorises the setting up of the Incident Management Room or authorises the decision to invoke the plan.
- There is no reference to business continuity expenditure or the authorising of such expenditure.

The failure to ensure clarity of information including the authorisation of expenditure may result in confusion and loss of time in an emergency situation.

Management Action Plan

The Management Action Plan in relation to Action Point 11 will address staff awareness of BC arrangements. The BCM-IMP will be reviewed for consistency of information, and updated to include the process for authorising and recording BC expenditure.

Importance:	Medium
Responsible Officer:	J Handling, Health Safety and Wellbeing Manager
Lead Service:	The Environment Service
Date for Completion (Month / Year):	December 2013
Required Evidence of Completion:	Updated BCM –IMP

Auditor's Comments

Satisfactory

Appendix 3: Glossary of Acronyms

Acronyms	Description
BC	Business Continuity
BCM	Business Continuity Management
BCM-IMP	Business Continuity Management – Incident Management Plan
BCP	Business Continuity Policy
BCSG	Business Continuity Strategy Group (the group responsible for developing, leading and monitoring BC across Council Services)
CAM	Consolidated Absorption Matrix
DRP	Divisional Recovery Plan
EP	Emergency Planning
ERIC	Employee Resource Information Centre
SP&R	Strategic Policy & Resources

