



**CabinetOffice**

**Keeping the Country Running:  
Natural Hazards and  
Infrastructure**

**Summary of Consultation Responses**

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# CONTENTS

Introduction.....	4
Summary of Responses.....	6
<b>Analysis of Responses:</b>	
Question 1: Definitions.....	7
Question 2: Components of resilience .....	9
Question 3: Guide content and structure .....	11
Question 4: Infrastructure Resilience Model.....	12
Question 5: Guide publication.....	14
Question 6: Identify Risks: Natural Hazards.....	15
Question 7: Identify Risks: Links with the National Risk Assessment.....	17
Question 8: Identify Risks: Other risks.....	18
Question 9: Assess Risks: Standards - blanket approach.....	19
Question 10: Assess Risks: Standards - flexible approach.....	20
Question 11: Evaluate Resilience: Sector Resilience Plans.....	22
Question 12: Build Resilience: Governance .....	24
Question 13: Guidance for regulated sectors.....	26
Question 14: Guidance for regulated sectors: Government support.....	27
Question 15: Sharing information and assessing dependencies.....	29
Question 16: Sharing information and assessing dependencies: National Planning Assumptions.....	31
Annex A: List of Responders .....	33

## Introduction

The National Security Strategy and Strategic Defence and Security Review identified the need to improve the resilience of the UK's critical infrastructure as one of the Government's highest resilience priorities.<sup>1</sup>

Accordingly, the Cabinet Office published for consultation the Guide, *Keeping the Country Running: Natural Hazards and Infrastructure*.<sup>2</sup>

The Guide shares best practice and advice to enable lead government departments, regulators, industry groups and emergency responders to work together to improve the resilience of critical infrastructure across the UK to disruption from natural hazards.

This document summarises the responses to the consultation, and shares next steps.

## Consultation Details

The consultation commenced on 1<sup>st</sup> March 2011 and closed on 6<sup>th</sup> May 2011.

The document contained sixteen closed questions to ease collation and analysis, but each responder was asked to share the reasons for their answer. Responders were also encouraged to provide general comments on any aspect of the Guide.

The Guide was placed for consultation on the UK Resilience pages of the Cabinet Office website and on the National Resilience Extranet.

## Consultation: Findings

The Cabinet Office received 52 responses to the consultation from a wide range of organisations including:

- Government: national and local public sector organisations (Devolved Administrations, Local Government and Government agencies);
- local responders: Individual Category 1 and 2 responders and Local Resilience Forums;
- professional bodies: national and European academic institutions, consultants, trade and consumer associations;
- providers of essential services (transport, energy, water, communications and emergency services);
- one regulator; and
- one individual.

Of the 52 responders, 45 provided responses to the questions posed in the Guide and 7 responders provided general comments only.

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<sup>1</sup> [www.cabinetoffice.gov.uk/resource-library/national-security-strategy-strong-britain-age-uncertainty](http://www.cabinetoffice.gov.uk/resource-library/national-security-strategy-strong-britain-age-uncertainty)

<sup>2</sup> [www.cabinetoffice.gov.uk/infrastructure-resilience](http://www.cabinetoffice.gov.uk/infrastructure-resilience)

The analysis of the responses illustrates that the Guide's policy proposals were met with widespread support. Comments focussed on suggestions on areas of improvement or a shift in emphasis rather than requests for a change in policy. Many of the comments helpfully suggested ways in which the work could be progressed.

In response, the Cabinet Office has made changes throughout the Guide to clarify certain points and address errors. In particular, we sought to:

- promote the 'all hazards' approach as the most appropriate method to build overall resilience;
- include text on:
  - dependency analysis (particularly between infrastructure owners);
  - domestic and international supply chain analysis; and
  - the "softer" elements of resilience within the four components of resilience;
- incorporate the infrastructure resilience model into existing resilience building models;
- signpost other relevant material;
- amend the information sharing Guidance to clarify that :
  - the Guidance complements existing and forthcoming more general Civil Contingencies Act 2004 information sharing guidance for Category 1 and Category 2 responders;
  - infrastructure owners and utility groups are encouraged to set up groups that would most support cross sector resilience building; and
- provide an end to end case study of the information sharing methodology.

Comments relevant to the future of this work have been reflected in this document and will form part of the forward work plan.

Annex A lists the 51 organisations that responded to the consultation.

## Summary of Responses

This section analyses the responses received to the consultation.

The analysis of the responses to each question has been split into three sections to ensure that all types of responses are considered.

For each question:

- section a) provides a breakdown of the “Yes”, “No”, and “No comment” responses by sector or organisation type;
- section b) shares some key comments drawn from the written responses to questions one to sixteen and the more general comments received; and
- section c) considers the information outlined in sections a) and b) and shares Cabinet Office’s decision and next steps.

**Table 1: Breakdown of responders to the Consultation by sector and type of organisation**

<b>Sector</b>	<b>Number of organisations that provided responses to questions 1 to 16</b>	<b>Total number of organisations that responded (including those that only provided general comments).</b>
Communications	2	2
Emergency Services	6	6
Energy	6	6
Government	9	11
Local Responders	8	8
Professional Bodies	8	10
Regulator	1	1
Transport	1	1
Water	4	5
Finance (Australia)	0	1
Individual	0	1
<b>Total</b>	<b>45</b>	<b>52</b>

**Question 1: Are the definitions for infrastructure in the Guide clear and appropriate?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	0	2	0
Emergency Services	5	0	1
Energy	5	1	0
Government	6	1	2
Local Responders	5	2	1
Professional Bodies	5	3	0
Regulator	1	0	0
Transport	1	0	0
Water	3	1	0
<b>Totals</b>	<b>31</b>	<b>10</b>	<b>4</b>
<b>Percentage</b>	<b>69</b>	<b>22</b>	<b>9</b>

**b) Examples of comments received:**

- the definitions are useful but would be improved by the inclusion of assessment criteria to support the identification of critical local infrastructure;
- Information or Information Technology should form a separate essential service;
- there are too many subtle differences and potential for overlap between the definitions for Critical National Infrastructure (CNI), Critical Infrastructure and Critical Local Infrastructure;
- the Guide is quite clear but the guidance would benefit from:
  - Defining or describing desired levels of resilience;
  - Defining or describing levels of response capability;
  - Offering metrics to assess infrastructure resilience; and,
  - Assigning responsibilities for decision making relating to criticality
- when assessing criticality no reference is made to 'customers' and other essential services which may rely on the provision of their products/services. The guide mentions the supply chain and others sectors that they may rely on

to provide their services, but this needs to be two way and assess the full supply chain, not just those that they rely on; and

- define by CNI levels rather than a catch –all –other category, as CNI designation can provide a real impetus for resilience building.

### **c) Consideration**

The majority of respondents agreed that the definitions for infrastructure were both clear and appropriate, but the Cabinet Office recognises that this remains a sensitive and complicated issue as illustrated by the comments above. Several responders asked for information on “measuring criticality” and in taking this work forward we will look into options for providing assistance in this area.

In response to requests for clarity about the criteria for assessing whether infrastructure assets to services are critical, we have:

- included in para 2.1 the definition of an emergency in the Civil Contingencies Act, and the criteria for judging whether an event is significant enough to qualify; and
- linked the definition of critical infrastructure to that.



**Question 2: Does the use of the four components of resilience (shown as Figure 2 in the guide) help to convey the need to think in broader terms than ‘protection’ when building resilience?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	2	0	0
Emergency Services	5	0	1
Energy	5	1	0
Government	7	0	2
Local Responders	6	1	1
Professional Bodies	7	1	0
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>38</b>	<b>3</b>	<b>4</b>
<b>Percentage</b>	<b>84</b>	<b>7</b>	<b>9</b>

**b) Examples of comments received:**

- it is particularly useful in conveying the potential cost effectiveness to an organisation of building a resilience capability;
- the four components provide an integrated consistent approach to developing infrastructure resilience and provide a sound framework from which all involved parties can base their plans;
- the recognition that different responses suit different circumstances and different sectors was well received;
- the all hazards approach should be afforded greater prominence;
- the interdependency of modern infrastructure should be incorporated into the diagram;
- the term “Reliance” could be applied to encourage organisations to map their dependencies;
- adding the term “Reassurance” would encourage organisations to communicate effectively with supply chains and customers throughout periods of disruption;
- integration of customer’s and service user’s expectations;
- recognition of the international element of supply chains; and

- integration of the softer elements of resilience, e.g responsiveness and capability to respond and recover to abnormal situations;

### **c) Consideration**

Although the four components of resilience received widespread support, an analysis of the comments received suggests that the four components of resilience would benefit from an increased emphasis on:

- an all hazards approach as the most appropriate method to build overall resilience;
- dependency analysis, particularly between infrastructure owners;
- domestic and international supply chain analysis; and
- the “softer” elements of resilience.

The Guide has been amended to reflect these comments (see *Section A: Chapter 2* of the Guide) and to recognise supply chain dependency and inter-dependency as elements of risk to business operations of infrastructure owners and operators.

As part of the implementation of the Guide, the Cabinet Office will work to encourage improved communications between infrastructure owners, service users / customers, regulators and suppliers.

**Question 3: Is the structure and content of the Guide helpful and clear?  
Please suggest how either can be improved.**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	5	0	1
Energy	6	0	0
Government	6	1	2
Local Responders	7	0	1
Professional Bodies	7	0	1
Regulator	1	0	0
Transport	1	0	0
Water	3	0	1
<b>Totals</b>	<b>37</b>	<b>2</b>	<b>6</b>
<b>Percentage</b>	<b>82</b>	<b>4</b>	<b>14</b>

**b) Examples of comments received:**

- the content and structure are helpful;
- could the Guide be adapted to suit different learning styles; and
- the inclusion of case studies from all the national infrastructure sectors would be helpful.

**c) Consideration**

The content and structure of the Guide received widespread support. The Cabinet Office agrees that the Guide would benefit from more case studies but, despite requests, no further case studies have been provided. We would be pleased to include links on the UK Resilience website to any case studies received. Links are included in the Guide to the published Sector Resilience Plans for 2010 and 2011.

**Question 4: Does the Infrastructure Resilience Model clarify the process of building infrastructure resilience?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	3	2	1
Energy	4	2	0
Government	7	0	2
Local Responders	5	2	1
Professional Bodies	3	4	1
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>29</b>	<b>11</b>	<b>5</b>
<b>Percentage</b>	<b>64</b>	<b>24</b>	<b>11</b>

**b) Examples of comments received:**

- it provides a quick and clear reference for understanding organisational resilience. It also places information sharing at the centre, which is a key theme in the document;
- the BCM model should have been used;
- not another model;
- the model mirrors the principles of emergency management;
- too simplistic a tool to consider infrastructure resilience. Needs to cross reference with the principles of Integrated Emergency management;
- central box could refer to cooperation & information sharing;
- the model does not signify at what stage information is shared; and
- an additional step might be: understand the criticality of the asset.

**c) Consideration**

The Infrastructure Resilience Model received more qualified support. The Cabinet Office considers that although the inclusion of the model was supported overall, the strength of opinion against the creation of a new resilience building model (owing to the existence of a number of well established models within the field of resilience

planning) should be recognised. Therefore, the Infrastructure Resilience model has been removed and replaced with the standard resilience cycle on which national resilience capability programme is based (see *Section B: Building Resilience* of the Guide).

This is the model that most readers will be familiar with as it applicable across all aspects of resilience building.

**Question 5: Should this Guide be published electronically on the UK Resilience website and National Resilience Extranet in parts to enable different audiences to access the relevant guidance / chapters?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	5	0	1
Energy	5	1	0
Government	6	1	2
Local Responders	7	1	0
Professional Bodies	7	1	0
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>37</b>	<b>5</b>	<b>3</b>
<b>Percentage</b>	<b>82</b>	<b>11</b>	<b>7</b>

**b) Examples of comments received:**

- strong support for the publication of the Guide electronically on the UK Resilience pages of the Cabinet Office website and the National resilience Extranet either in sections and / or in its entirety; and
- it would be helpful if the Guide signposted other relevant advice.

**c) Consideration**

The Cabinet Office will publish the Guide on the UK Resilience pages of the Cabinet Office website and the National Resilience Extranet both in its entirety and in sections. The Guide has signposted other relevant material.

**Question 6: Does the ‘unrestricted’ information on the hazards from the National Risk Assessment provide a reasonable basis for emergency planning for infrastructure?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	2	0	0
Emergency Services	5	0	1
Energy	6	0	0
Government	6	1	2
Local Responders	6	1	1
Professional Bodies	7	1	0
Regulator	1	0	0
Transport	0	1	0
Water	4	0	0
<b>Totals</b>	<b>37</b>	<b>4</b>	<b>4</b>
<b>Percentage</b>	<b>82</b>	<b>9</b>	<b>9</b>

**b) Examples of comments received:**

- helpful to consider the interdependencies between risks and the connection between different natural hazards events;
- helpful to cross reference with geographical information;
- the National Risk Assessment needs to be shared with a much broader emergency planning audience;
- useful but greater scrutiny is required of the science that underpins the National Risk Assessment; and
- it would be useful to maintain a central database of natural hazards events.

**c) Consideration**

The inclusion of the natural hazards contained within the National Risk Assessment (NRA) received strong support.

Evidence for planning for emergencies in the UK is provided by the NRA which has been cited by the Organisation for Economic Cooperation and Development as an example of ‘best practice...for producing tools to help high level policy makers

compare multiple risks.<sup>3</sup> Although the NRA process is coordinated by Cabinet Office, its production relies upon extensive expertise from within and outside government, including scientific advice. The NRA aims to provide a well-rounded evidence base which can be used to inform decisions about building UK resilience.

To ensure scientific evidence is given due consideration during the NRA process, departments across Whitehall are expected to draw upon their Scientific Advisory Groups and Chief Scientific Advisors when reviewing, updating and identifying new risks, and Cabinet Office continues to encourage Lead Government Departments to do this. To ensure quality is maintained, a number of review mechanisms are built into the NRA process.

But work is underway across government to identify ways to strengthen scientific scrutiny within the NRA process, taking into account the report by the House of Commons Science and Technology Select Committee on scientific evidence and advice in emergencies and in risk assessment for emergencies.<sup>4</sup>

The Cabinet office continues to seek ways to share risk information more widely. To this end, the next stage in this work includes the option of essential services planning assumptions (see question 16).

The Cabinet Office considers that it would be too resource intensive at this time to maintain a central database of natural hazards events, beyond the examples contained in the National Risk Register.

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<sup>3</sup> Organisation for Economic Co-operation and Development report '*Innovation in Country Risk Management*': [http://www.oecd.org/dataoecd/33/18/42226946.pdf?bcsi\\_scan\\_F8D0BFE83951C3DA=XCi/RNOHcVvWqmHlbFfI/FEAAAUQEdd&bcsi\\_scan\\_filename=42226946.pdf](http://www.oecd.org/dataoecd/33/18/42226946.pdf?bcsi_scan_F8D0BFE83951C3DA=XCi/RNOHcVvWqmHlbFfI/FEAAAUQEdd&bcsi_scan_filename=42226946.pdf)

<sup>4</sup> [www.publications.parliament.uk/pa/cm201012/cmselect/cmsctech/1139/113902.htm](http://www.publications.parliament.uk/pa/cm201012/cmselect/cmsctech/1139/113902.htm)



**Question 7: Should this information on hazards be linked to the National Risk Assessment to ensure new risks are included in future updates of this guidance?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	2	0	0
Emergency Services	5	0	1
Energy	6	0	0
Government	7	0	2
Local Responders	6	1	1
Professional Bodies	8	0	0
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>40</b>	<b>1</b>	<b>4</b>
<b>Percentage</b>	<b>89</b>	<b>2</b>	<b>9</b>

**b) Examples of comments received:**

- important to ensure that the guidance and risk assessments remain up to date; and
- yes. Needs to be made clear in document that risks change over time.

**c) Consideration**

Maintaining the link with the National Risk Assessment process, and National Risk Register received strong, widespread support. The Cabinet Office will ensure that the link remains active to reflect that risks can change over time.

**Question 8: Is information required on any other risks not included in this current version of the Guide? If yes, please state which natural hazards?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	2	3	1
Energy	2	3	1
Government	4	3	2
Local Responders	4	3	1
Professional Bodies	4	3	1
Regulator	0	1	0
Transport	0	1	0
Water	2	2	0
<b>Totals</b>	<b>19</b>	<b>20</b>	<b>6</b>
<b>Percentage</b>	<b>42</b>	<b>44</b>	<b>14</b>

**b) Examples of comments received:**

- include infectious diseases; reservoir inundation; severe space weather; chronic hazards such as El Nino; prolonged period of wet weather; incidents abroad affecting the UK; asteroid or meteorite impacts; and
- more emphasis should be placed on consequences of natural hazards events.

**c) Consideration**

A number of additional risks were suggested. In line with the response to question 7, we propose to keep the hazard information aligned with the NRA, but, on the basis of these responses will also include relevant hazards from the risk under review section of the NRA. The Guide has been updated to include the effects in the UK of severe volcanic activity overseas (see *Section C: Guide 1: Guidance on Natural Hazards of the Guide*).

**Question 9: Do you agree that a blanket standard for all hazards and all sectors would be disproportionate and unachievable?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	4	1	1
Energy	6	0	0
Government	5	2	2
Local Responders	6	1	1
Professional Bodies	5	3	0
Regulator	0	1	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>32</b>	<b>9</b>	<b>4</b>
<b>Percentage</b>	<b>71</b>	<b>20</b>	<b>9</b>

**b) Examples of comments received:**

- a blanket standard would be too complex and unworkable;
- too prescriptive & would not allow variance for any alternative sector specific standards;
- possible to produce a minimum service standard for each sector as in the water sector;
- a blanket minimum standard should be achievable and promote consistency; and
- this section of the guide might be improved by providing more information on the wide range of current resilience and service standards by sector.

**c) Consideration**

Although there were calls for government to set sector specific minimum service standards, the majority of responders agreed that sectors already had such standards in place and a blanket resilience standard would be disproportionate. This position was also supported by the responses to Question 10.

Cabinet Office would be happy to collate sector standards that infrastructure owners / experts believe are relevant to their sectors.

**Question 10: Is this flexible approach that builds upon existing industry standards workable in practice?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	2	1	3
Energy	6	0	0
Government	6	0	3
Local Responders	6	1	1
Professional Bodies	7	1	0
Regulator	1	0	0
Transport	0	0	1
Water	4	0	0
<b>Totals</b>	<b>33</b>	<b>4</b>	<b>8</b>
<b>Percentage</b>	<b>73</b>	<b>9</b>	<b>18</b>

**b) Examples of comments received:**

- utilising existing industry standards and having flexible output based standards (i.e. continuity of customer service / supplies) will allow the most appropriate and cost effective solutions to be adopted by the asset owner / operator;
- careful balance required between recognising variance between sectors and ensuring accountability. Important to recognise that resilience is a competitive advantage;
- should be integrated into regulatory frameworks;
- the flexible approach is workable but care must be taken to guard against uncertainty of standards between sectors;
- must be built on the four components of resilience; and
- further work is required for government, regulators and infrastructure owners and operators to understand the quality and coverage of existing standards.

**c) Consideration**

There was strong support for the use of existing industry standards to drive forward resilience building throughout sectors, but this should be underpinned by strong lines

of communication within and between infrastructure owners, government, regulators, suppliers and customers to promote a shared understanding.

It was suggested that an analysis of existing standards should use, as a framework, the four components of resilience. This would promote a holistic understanding of an organisation's current level of resilience.

The promotion of a holistic approach to resilience building using the four components of resilience and the advice on information sharing will be a focus of the Guide's implementation strategy.

**Questions 11: Are Sector Resilience Plans a helpful method to gain a regular high-level assessment of the overall resilience of infrastructure in each Sector? Please explain your answer, and suggest any further or alternative methods of assessing infrastructure resilience and/or monitoring progress.**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	5	0	1
Energy	6	0	0
Government	6	0	3
Local Responders	4	3	1
Professional Bodies	6	2	0
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>34</b>	<b>6</b>	<b>5</b>
<b>Percentage</b>	<b>76</b>	<b>13</b>	<b>11</b>

**b) Examples of comments received:**

- too high level, need to be tied into Local Resilience Forums;
- yes. Need to take account of relationship between sectors;
- we fully support the intention for Lead Government Departments to produce regular updated Sector Resilience Plans. We believe that such plans are essential to enable appropriate and meaningful tri-partite dialogue between government, regulators and infrastructure owners; and
- the production of Sector Resilience Plans will help all relevant organisations understand the broader resilience picture and enable them to assist in improving resilience where required.

**c) Consideration**

Sector Resilience Plans (SRPs) were recognised as a helpful method to gain a regular high level assessment of the resilience of infrastructure within each sector. There were calls for SRPs to discuss in more detail the relationship between sectors, which is something that the Cabinet Office will consider within future versions.

Several responders raised the issue of Local Resilience Forums (LRFs) making use of the sector plans, or being able to inform the plans. The SRPs were originally intended to underpin central government's engagement with infrastructure resilience. But future iterations of these plans, where relevant, will consider the effectiveness of sector's of engagement with LRFs.

Owing to their sensitive nature, individual SRPs will not be made public but a summary is made available annually at: [www.cabinetoffice.gov.uk/infrastructure-resilience](http://www.cabinetoffice.gov.uk/infrastructure-resilience)

**Question 12: Do you agree with the need to ensure resilience is incorporated into corporate governance?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	2	0	0
Emergency Services	5	0	1
Energy	5	1	0
Government	7	0	2
Local Responders	7	0	1
Professional Bodies	8	0	0
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals</b>	<b>40</b>	<b>1</b>	<b>4</b>
<b>Percentage</b>	<b>89</b>	<b>2</b>	<b>9</b>

**b) Examples of comments received:**

- incorporation into corporate governance allows resilience to be hard wired into all aspects of a business. Support from the top of the business is essential to ensure resilience is effectively instilled in the business and continuously improved upon;
- the ability to maintain the right levels of customer service should be considered in all activities undertaken on a daily basis. Resistance, Reliability, Redundancy and Response and Recovery are all components that will help achieve infrastructure resilience within organisations; and
- if clear definitions and standards are established it would be expected that these would also be captured under the same Legal and Licence compliance criteria and so no separate reference in corporate governance should be necessary.

**c) Consideration**

Embedding resilience into organisation’s corporate governance processes received a high level of support.



The Cabinet Office is keen to build on this strong level of support and will continue to work with lead government departments, infrastructure owners and regulators to secure the successful integration of resilience into corporate governance systems; not just in essential service providers but also within their supply and distribution systems.

The Cabinet Office is also working in partnership with the private sector to provide support to small and medium sized enterprises enabling them to strengthen their resilience through improved business continuity.

**Question 13: Is this guidance helpful for organisations in the economically regulated sectors?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	0	1
Emergency Services	1	0	5
Energy	5	0	1
Government	3	0	6
Local Responders	4	4	0
Professional Bodies	7	0	1
Regulator	1	0	0
Transport	1	0	0
Water	2	1	1
<b>Totals</b>	<b>25</b>	<b>5</b>	<b>15</b>
<b>As a percentage</b>	<b>56</b>	<b>11</b>	<b>33</b>

**b) Examples of comments received:**

- this guidance is helpful, and (as is stated in the consultation document) further joint action is now required in order to address the eight considerations within Box 7. There are many examples of good practice within each of the CNI sectors, and forums to share and discuss these will be important. We suggest that the regulator’s role in building resilience is covered more explicitly within Sector Resilience Plans, which should be the primary vehicle for ‘performance reporting.’

**c) Consideration**

The Guidance was recognised as helpful for organisations in economically regulated sectors. Where appropriate, the role of economic regulators will continue to be covered in future versions of Sector Resilience Plans.

**Question 14: Is there any further support needed from Government to enable regulated sectors to build resilience in infrastructure?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	2	0	0
Emergency Services	1	1	4
Energy	1	2	3
Government	1	2	6
Local Responders	5	3	0
Professional Bodies	5	2	1
Regulator	1	0	0
Transport	0	1	0
Water	3	1	0
<b>Totals</b>	<b>19</b>	<b>12</b>	<b>14</b>
<b>As a percentage</b>	<b>42</b>	<b>27</b>	<b>31</b>

**b) Examples of comments received:**

- need more incentives for Category 2 responders to engage with Category 1 responders under the Civil Contingencies Act 2004) and share information;<sup>5</sup>
- government should establish a method to audit resilience;
- perhaps the most important function for government (via respective Lead Government Departments and regulators) is to monitor the overall programme of resilience activity, as set out in the Sector Resilience Plans. High priority actions for each year should be defined in more detail and reported more widely to stimulate a focus on collective goals. Progress and achievements could also be highlighted through annual National Resilience Awards;
- there should be mechanisms in place to ensure value for money and guarding against regional investment inequality being driven by the availability of contributions from third parties. Long term business planning of business costs is required to ensure the necessary regulatory funding to undertake works and run the business. Relatively short term timescales of funding requests for investigation reports and requests from third parties for joint

<sup>5</sup> Under the Civil Contingencies Act 2004, Category 1 responders are the main organisations involved in most emergencies at the local level, for example the emergency services. Category 2 responders are likely to be heavily involved in some emergencies, for example utility and transport companies.

funding of projects e.g. EA flood defence projects, could be a major obstacle as these costs will not be within current business plans. A mechanism would be required to allow recovery of these costs from our regulatory funding processes; and

- companies, policy makers and our regulators should seek to minimise costs to customers by ensuring that a cross sector approach, which effectively manages inter-dependencies, is taken to mitigating the risks presented by climate change, natural hazards and other threats such as terrorism.

### **c) Consideration**

The Cabinet Office is currently considering the scope of future versions of Sector Resilience Plans, including ways in which these could be used to better assess resilience, set priority actions for improving resilience and provide an annual cross sector assessment of resilience.

Infrastructure owners and regulators should work with their Lead Government Departments and Regulators to resolve any regional investment inequalities.

**Question 15: Do you consider that this approach is suitable for Cat 1 and Cat 2 responders who do not already have arrangements in place to share information on critical infrastructure? Please explain your answer, and suggest any further clarification that is necessary.**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	1	1	0
Emergency Services	3	2	1
Energy	3	2	1
Government	5	1	3
Local Responders	5	2	1
Professional Bodies	5	2	1
Regulator	1	0	0
Transport	1	0	0
Water	4	0	0
<b>Totals (out of 45 responders)</b>	<b>28</b>	<b>10</b>	<b>7</b>
<b>As a percentage</b>	<b>62</b>	<b>22</b>	<b>16</b>

**b) Examples of comments received:**

- information sharing should be mandatory, supported by regulations and sanctions for non-compliance;
- no need to maintain lists during peacetime of critical assets: the key aspect is to build effective cross sector relations;
- there may be more utility in ensuring regulators, through existing vertical relationships, apply the necessary standards , than in attempting to make Local Resilience Forums (LRFs) largely responsible for the core business of infrastructure providers;
- proposal is still far too restrictive and ties the hands of LRFs , must release the shackles on Cat1’s;
- further clarification could be given for some sections e.g. 8.9 (d) Improve knowledge of Critical Infrastructure- this does not give enough detail to those with little or no knowledge of Critical Infrastructure, examples of how this may be done, what organisations should be looking for could be given i.e. XX no.

of households will be affected by the loss of this substation therefore LRFs should be aware;

- exercising with infrastructure owners is of use in building good relationships and increasing knowledge of infrastructure resilience as was done in Cleveland through Exercise Watermark which involved representatives from local top tier COMAH sites and utilities;
- approach provides a concise coherent model that can be adopted by LRFs;
- logical process but would benefit from sharing an end-to-end case study.
- guide should reference dependencies and the needs to share information across international boundaries;
- should include other key infrastructure owners not currently recognised as Cat 2 responders, eg COMAH operators and power generators; and
- process in NW utility group shows that the process is being undertaken and it works.

### **c) Consideration**

In general, the proposed approach to share information on critical infrastructure between Category 1 and Category 2 responders (under the Civil Contingencies Act 2004) was well supported. The government does not intend to legislate to enforce information sharing. But, to reflect comments, the Cabinet Office has confirmed in the Guide that:

- infrastructure owners should build and maintain good working relationships with relevant Category 1 responders, to advise on business continuity planning and have an understanding of response and continuity activities during a disruption;
- the Guidance complements existing and forthcoming more general Civil Contingencies Act 2004 information sharing guidance for Category 1 and Category 2 responders (see *Section B: Chapter 7* of the Guide); and
- it is not prescriptive and planners, responders, infrastructure owners and utility groups are encouraged to establish arrangements that would most support cross sector resilience building in their area. This may mean, for example that the utility group cuts across a number Local Resilience Forum boundaries and involves representatives from organisations not currently included as Category 1 or 2 responders (see *Section B: Chapter 7* of the Guide).

The Cabinet Office will also provide an end to end case study to assist readers understanding of some of the practical issues involved in the implementation of the guidance and derived benefits.

**Question 16: The process for information sharing includes a step to determine planning assumptions for the loss of essential services in an LRF area. Would it be helpful for the Cabinet Office to produce national planning assumptions for loss of essential services?**

**a) Breakdown of responses, “Yes”, “No”, “No comment” by sector and organisation type:**

<b>Sector</b>	<b>Yes</b>	<b>No</b>	<b>No Comment</b>
Communications	2	0	0
Emergency Services	5	0	1
Energy	4	0	2
Government	7	0	2
Local Responders	4	3	1
Professional Bodies	6	1	1
Regulator	0	1	0
Transport	1	0	0
Water	3	1	0
<b>Totals</b>	<b>32</b>	<b>6</b>	<b>7</b>
<b>Percentage</b>	<b>71</b>	<b>13</b>	<b>16</b>

**b) Examples of comments received:**

- any centrally produced planning assumptions would assist in delivering consistency across the sectors, however this should complement any existing centrally produced measures such as the water sector’s Security and Emergencies Measures Direction timelines and populations affected;
- this would be a helpful tool for Local Resilience Forums (LRFs) to use in support of their planning process. Any assumptions need to retain the flexibility to allow LRFs to reflect the local scenario;
- this information would also assist in determining the interdependencies within the LRF areas;
- the type of information shared is important as electricity distribution networks do change and faults / outages can make one site critical one week but not the next;
- an alternative approach would mandate each organisation to complete their own business continuity planning - identifying their upstream dependencies and planning for loss of one or more of these upstream dependencies and

also planning for other risks to their operation that affect their ability to provide for their downstream dependents;

- probably best determined at a local level in compliance with national guidance;
- as with the other national planning assumptions, they can be considered by the Risk Assessment Group and used to inform the process of risk assessment and ensure that a cohesive approach is being adopted;
- the method of providing essential services at a local level is not consistent throughout the UK and therefore national planning assumptions would not be a benefit. Guidance and support is required to ensure that all organisations providing essential services work collaboratively to share information to ensure a consistent approach is taken to resilience at the local level and that infrastructure owners understand which other essential services rely on their products/services to inform their risk assessments; and
- some companies provide services to multiple LRF areas and have developed appropriate working relationships that span a multiple of LRF areas with these partners. It would, therefore, be helpful if the Cabinet Office were to provide details of national planning assumptions for the loss of essential services so that consistent requirements could be applied for each LRF area and thus help avoid a situation occurring where each LRF area attempts to establish its own expectation of service requirements.

### **c) Consideration**

The provision of essential service planning assumptions received widespread support. Cabinet Office will work with infrastructure owners and responders to develop and test the planning assumptions taking fully into account the comments raised by responders.



## **Annex A**

**We would like to thank the following organisations that took the time to respond to this consultation:**

ACPOS Emergency Planning Sub Committee  
Alecson Field  
Anglian Water  
Association of Electricity Producers  
Atkins  
BAE Systems DETICA  
BCS - The Chartered Institute for IT  
Bournemouth Dorset and Poole LRF Flood group  
British Standards Institute  
Cleveland Local Resilience Forum  
Consumer Council for Water  
Cumbria Police / Cumbria Local Resilience Forum  
Department of Health, Social Services and Public Safety (Northern Ireland)  
Dyfed Powys Local Resilience Forum  
Emergency Planning Society (West Midlands)  
Energy Network Association  
Environment Agency  
Europa Council of the International Association of Emergency Managers  
Greater Manchester Police  
Greenwich County Council  
Health and Safety Executive  
Hillingdon Council  
Humber Emergency Planning Service  
Humberside Fire and Rescue Service  
Institute of Civil Protection and Emergency Management  
Institution of Civil Engineers  
Intellect  
International Association of Emergency Managers  
Lancashire County Council  
London Fire Brigade  
Luton Borough Council  
National Grid  
North Wales Resilience Forum

Northumbrian Water Ltd  
OFWAT  
Ordnance Survey  
Rotherham Metropolitan Borough Council & Sheffield County Council  
RWE NPower  
Serco Group PLC  
Severn Trent Water Ltd  
South Western Ambulance Service NHS Trust  
South Yorkshire Fire and Rescue Service  
Suffolk County Council  
Suffolk Resilience Forum  
Telford & Wrekin Council  
Transport for London  
UK Power Networks  
United Utilities PLC  
University of Exeter  
West Sussex County Council  
Western Power Distribution