

**HUNTINGDONSHIRE DISTRICT COUNCIL**

**Title/Subject Matter:** Corporate Business Continuity Planning  
(2013 Annual Report)

**Meeting/Date:** COMT – 18/11/2013  
Corporate Governance Panel – 27/11/2013

**Executive Portfolio:** Executive Leader

**Report by:** Corporate Business Continuity Coordinator  
(IMD Service Manager)

**Ward(s) affected:** All

---

**Executive Summary:**

The BC Plan has been reviewed and updated as part of an annual review cycle. There were no incidents during the reporting year which required the instigation of the Plan. An exercise to test the robustness of the plan were undertaken and the lessons learned are being reviewed and, where appropriate, incorporated in the Plan before it is re-issued.

BC Coordinators will continue to incrementally improve the BC Plan over the next reporting period and a further exercise will be undertaken.

The annual budget for the BC activity is being reduced to £3k pa.

**Recommendation(s):**

COMT/Corporate Governance Panel is invited to comment on the contents of the report.

This page is intentionally left blank

## 1. PURPOSE

1.1 The purpose of this paper is to:

- a) Inform the Panel of the progress that has been made in planning for Corporate Business Continuity since the last report in December 2012;
- b) Review the BC exercise that was undertaken in August/September 2013; and,
- c) Report on BCP incidents since December 2012.

This paper describes the processes around the development and maintenance of the **Business Continuity Plan (BCP)** but does not include the detail of the Plan itself.

## 2. BACKGROUND

2.1 Responsibility for updating & maintaining the **Business Continuity Plan (BCP)** (previously the **Service Recovery Plan**) was assigned to the IMD Service Manager approximately 2 years ago after the inadequacy of the Service Recovery Plan was highlighted in an audit report in 2010/11.

2.2 There followed substantial work to re-establish the BCP team drawn from each service and the BCP was rewritten.

2.2 BGG Associates, who specialise in the areas of Emergency Planning and Business Continuity, reviewed the draft BCP against the British Standard for Business Continuity BS25999 in September 2012.

## 3. PROGRESS SINCE THE LAST REPORT TO THIS PANEL

3.1 The BGG report highlighted a number of issues which formed the BCP team's Improvement Plan for the current year. Two issues of particular note were:

- a) Identification of Alternative Accommodation
- b) Determination of a "definitive" set of priority services elements

### 3.2 Alternative Accommodation

3.2.1 In the event of a serious incident one or more of the Council's buildings (or part thereof) may become uninhabitable. Under these circumstances alternative accommodation would need to be found. This would be either for public access or for Officer/Member occupation.

3.2.1 For public access, agreement in principle has been reached with Huntingdon Library to offer alternative accommodation for face to face services if Pathfinder Customer Centre (CSC) was inaccessible. At present, if other CSCs were inaccessible, then the public would be referred to Pathfinder House. Due to the availability of the CPSN<sup>1</sup> data network it would be feasible to operate most, if not all, of HDC application systems from other CPSN nodes

---

<sup>1</sup> CPSN – Cambridgeshire Public Services Network – is a pan-Cambridgeshire (soon to be extended into Northamptonshire) data communications which allows connected "nodes" (typically a public sector building) to communicate with every other node on CPSN. For HDC the majority of Council-owned buildings are connected to CPSN including Pathfinder, Eastfield, the Leisure Centres. For those buildings **not** connected directly there is an intermediate link in place to a CPSN node.

(such as the Library). This arrangement needs to be formalised and tested over the next reporting period.

- 3.2.2 For alternative Officer/Member occupation, discussions have been held with the MAC (Making Assets Count) team although no formal agreement has yet been reached. However, due to the large number (>400) of CPSN nodes within Cambridgeshire, in the event of a serious incidents there would be a wide variety of possible alternative accommodation options that could be considered.
- 3.2.3 Within HDC's own estate a table has been drawn up which lists a number of building facilities eg capacity, availability of catering facilities, network access points, WiFi etc. and this is being completed for each building. This should allow the BC coordinator to make flexible decisions around alternative accommodation depending on the circumstances of the incident.
- 3.2.4 A further option is to allow Officers to work from home via a standard internet connection. At present this facility is limited both in terms of the numbers of concurrent connections (50) and also the range of systems available. A priority system would be imposed in case of an incident. The desktop virtualisation project – expected to begin roll-out in 2014/15 - would greatly reduce these two restrictions.

### 3.3 **Priority Service Activities**

- 3.3.1 Each service has identified and ranked its own priority activities depending on the time frame of the incident ie within 24 hours, within 7 days and within 30 days. A workshop was held for service BC Coordinators to discuss and agree a pan-Council priority list for public facing service elements. The list isn't to be followed rigidly but acts as a guide for the corporate BC coordinator in the event that resources need to be prioritised during an incident.

### 3.4 **BC Exercise**

- 3.4.1 During August and September an exercise was facilitated by BGG. This was the first time that the BC Plan had been "used in anger". Participants included most of the service BC Coordinators and their deputies; their positive comments demonstrate the value of the exercise and it is planned that an exercise will be held annually to help ensure the BC Plan remains a "living" document.
- 3.4.2 The BGG report is included in Annex 1. A number of issues were identified with the Plan and these are being addressed (see Appendix 1 within the Annex).

- 3.5 **Other activities.** BC Coordinators reviewed and updated their service BCPs and attended 1-2-1 sessions with the corporate BC Coordinator to ensure consistency and completeness across the plans. Once the updates have been finalised and signed off by their respective Heads of Service then the full Plan will be re-issued. Quarterly meetings of the service Coordinators are held to discuss specific issues and maintain awareness of the Plan.

## 4. **BC INCIDENTS DURING THE REPORTING YEAR**

- 4.1 There were no incidents during the year which required the instigation of the Plan. However, there was proactive communication between Coordinators

and COMT to share information regarding the Council's response to snowfall on a number of occasions.

- 4.2 There were a number of partial IT failures during the year which were individually recorded and analysed to help avoid re-occurrence. For example, loss or disruption to network connections to various sites – notably the Call Centre and Ramsey Leisure Centre. There was also disruption to the EDM system and, separately, to the web site and the Benefits Application e-Form.

## **5. KEY RISKS**

- 5.1 The Corporate BC Coordinator (CBCC) role, if fully undertaken, can be quite time consuming during the annual update cycle and this detracts from other important Service Manager roles – in particular ensuring that the ICT BC Plan is fully specified and tested.

## **6. RESOURCE IMPLICATIONS**

- 6.1 Apart from officer time the only expenditure has been the BC exercise workshop and accordingly the annual budget for the BC activities will be reduced to £3k from 2014/15.

## **7. LIST OF APPENDICES INCLUDED**

Annex 1 - Business Continuity Planning Workshop

## **BACKGROUND PAPERS/REFERENCES**

- A) CORPORATE BUSINESS CONTINUITY PLANNING (2012 ANNUAL REPORT)
- B) BUSINESS CONTINUITY INTRANET SITE:

<http://teams.huntsdc.gov.uk/imd/BusinessContinuity/default.aspx>

## **CONTACT OFFICERS**

Chris Hall, IMD Service Manager (Corporate BC Coordinator) x8116  
Kate Adams, IMD Support Team Officer x8173



Huntingdonshire District Council

# Business Continuity Planning Workshop

Post Training Report prepared by BGG Associates

13th September 2013

BGG Associates Limited  
St. John's Innovation Centre  
Cowley Road  
Cambridge CB4 0WS  
01353 779213



## ■ Introduction

Huntingdonshire District Council is committed to developing and maintaining a prepared and resilient organisation to ensure that it is ready for any business interruption or emergency situation that may occur, both internally and/or externally, that threatens its ability to exercise its civil protection and/or ordinary functions, as required by the Civil Contingencies Act 2004.

Following updating of the Council's Business Continuity Plan the Council commissioned BGG Associates, specialists in the fields of emergency management and business continuity, to organise and deliver two training workshops designed to test the draft Plan and provide training for members of the Corporate Business Continuity Team (CBCT).

All attendees confirmed that in their view the workshop objectives were fully met and they all rated the session as 'very good' or 'good'.

The workshops identified a number of learning / action points and these are set out at the end of this report in Appendix 1. (In preparing the exercise we have spotted a few minor typos in the Draft Plan and these are detailed in Appendix 2).

## ■ Workshop Objectives

The objectives set for the workshops were:

- To provide an opportunity for Council managers to familiarise themselves with the Council's Corporate Business Continuity Plan and their role within it.
- To test the Council's Corporate Business Continuity Plan and the internal service management arrangements.
- To identify learning points which can lead to further improvement of the Council's business continuity arrangements.

## ■ Attendance

The first workshop on the 29<sup>th</sup> August was attended by:

<b>Name</b>	<b>Role</b>
Chris Hall	BC Lead
Amanda Burns	Customer Service
Paul France	One Leisure
Nicky Daish	Financial services
John Taylor	Information Management
Brian Bentley	Environmental Management
Neil Coleman	Planning Services
Tracy Elwood	Operations
Wayne Channon	Payroll
Anthony Roberts	Legal, administration and Democratic Services
Kate Adams	Business Continuity
Roger Clark	Emergency Planning

Unfortunately two attendees were unable to come:

Jackie McCarter	Payroll/LGSS
Howard Thackray	Corporate Team

The second workshop on the 12<sup>th</sup> September was attended by:

Name	Role
Paul Jose	BC Lead
Jon Collen	Housing
Kathryn Sexton	Customer Service
Michelle Schwick	One Leisure
Clive Mason	Finance
Howard Thackray	Corporate Team
Andrew Howes	Information Management
Ian Medicott	Planning Services
Richard Hollingsworth	Environmental Health
Lisa Morris	Payroll/LGSS
Karen Pauley	Legal, administration and Democratic Services
Laura Pearson	Business Continuity
Steven Howell	Emergency Planning
Chris Hall	Head of Information Management (Observer)
Kate Adams	IMD Support Officer (Observer)

Unfortunately two attendees were unable to come:

Gerry Ryan	Environmental Management
John Craig	Operations

## Workshop Content

The workshop started with a short presentation to ensure that all attendees were familiar with the contents of the draft plan and was followed by *Exercise Vulcan*.

### Workshop Programme

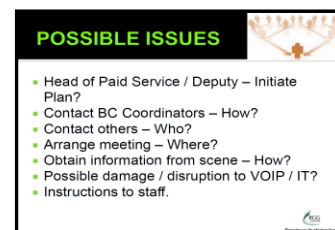
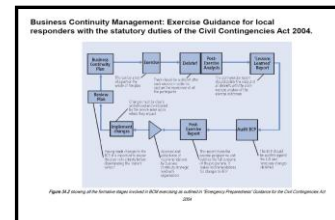
09.00	Coffee and Registration
09.15	Introduction and Summary of Business Continuity Plan
09.50	Exercise 'Vulcan' Commences
10.45	Coffee Break
12.15	Exercise End
12.30	Hot Debrief
13.00	End

Exercise Vulcan was a scenario in which Pathfinder House was severely damaged by fire requiring a relocation of the Council's services.

The scenario ran from the initial alert, through the invocation of the Corporate Business Continuity Plan and challenged the Corporate BC Team to manage the first 7 hours of the response.

The exercise culminated in the Team providing a briefing for the Head of Paid Service.

Following the exercise a Hot- debrief was held to identify learning points (See Appendix 1).





## ■ Assessment of the Workshops

At the end of the workshop participants were asked for feedback on their learning and their assessment of the event itself.

### **Learning Points:**

*(Please identify what you consider to be the three most important learning points identified today)*

- Contact details for officers and the contact process.
- How the BC team should lead.
- Relevant information to contribute to process.
- Greater understanding.
- I am expected to be a member of the BC team in an actual emergency!
- Understanding your own element of the BCP.
- Key points to start the process.
- Role of the group.
- Team work.
- Need for Team Work.
- How the BC 'Group Dynamic' works.
- Understanding where my service can fit into the Corporate BCP.
- How team fits and works together.
- Working together as a team – interesting dynamics.
- Good to work with BCP Team.
- Involvement of Corporate Office/Comms.
- Thinking on your feet.
- To ensure I have a better knowledge of the BCP.
- Gained an awareness of how the BCP and emergency planning process interconnect.
- External events and implications for BC procedures.
- Uncertainty and expectations of current systems.
- Continuity between Emergency Planning Team i.e. Business Continuity Team.
- That a strong Chairman is needed.
- That a clarity of intent and a consensus of action should be achieved ASAP.
- That it is easy to deal with the immediate feature at the expense of longer term objectives.
- Need to record actions.
- Record all issues and actions.
- Active response process on white board.
- Issues/actions table is very helpful to be able to see wood for the trees.
- Need more than one 'loggist'.
- Clear logging of incident and actions.
- Action boxes on action sheet need to be bigger.
- Accuracy identifying service priorities.
- To clarify team roles in an emergency scenario.
- To put the paper plan into real practice and test out the documents i.e. log sheets.
- To highlight areas of missing information in the plan and prompt BC team to improve the plan in these areas.
- Effective communication to all stake holders.
- Communication.
- Communications.
- Make sure Comms plan is visible.
- Comms need to be clearer how info is cascaded & what the message is.
- Communication – how to tell staff etc.
- What important messages/actions need to take place in the event of an incident/emergency.
- To understand how important communication is.
- Good communication.

- Lots of people will ask for IT immediately – be ready!
- IT what happens if we lose the server room.
- Best to delegate.
- Better understanding of my role as Deputy.
- Seeing the process in action.
- Seeing what works.
- Identifying 'holes'.
- Testing the Plan and finding gaps to consider and fill.
- Make sure the BCP is up to date.
- Banking arrangements.
- Cheque stock
- Printout of suppliers / HB – contacting suppliers / landlords etc.
- Refreshing the BC process and action plan.
- Plan review required for minor points.
- Customer Services – move elsewhere.
- Contact for HR to be updated.
- Service Plan for HR?
- Familiarise myself with the Plan.
- Run through of the Plan very useful.
- Work to be done internally for IT BCP.

**Training and Support:**

*(Please identify any areas related to business continuity emergency management in which you would like further training or support)*

- Learning how the emergency plan team operates.
- Continuation of training exercises.
- I feel it would be worthwhile regularly testing the plan and reviewing it
- Ongoing refreshers.
- Need better understanding of the fine detail of network and VOIP infrastructure.
- Loggist training.
- Loggist training.
- Loggist training – hard to take notes, can't log information and actions.
- Minute taking.

**Did the event fulfil the aim and objectives?**

OBJECTIVE	YES	NO
To provide an opportunity for Council Managers to familiarise themselves with the Council's Corporate Business Continuity Plan and their role with it.	24	0
To test the Council's Corporate Business Continuity Plan and the internal service management arrangements.	24	0
To identify learning points which can lead to further improvement of the Council's business continuity arrangements.	24	0

**Overall assessment of the event:**

Very Good	Good	Weak	Poor
13	11	0	0

**Any other remarks:**

- Thanks, I have enjoyed the day!
- Very useful session.
- I have a much better understanding of what's in the Plan.

- I really enjoyed the experience!
- Thank you for the training I found it really useful.
- Thanks.
- Thank you a well run and valuable training exercise.
- Very helpful.
- One of the best things I have done recently.

## ■ Feedback from Facilitators

In both exercises the Teams made full use of the Draft CBCP and it proved a very useful and effective vehicle for shaping the Council's response to the exercise scenario. Whilst a number of areas were identified where the Council's arrangements could be made more robust, this should not in any way detract from the very significant work that has been done to bring the Plan to its current stage. Overall the Plan stood up well and allowed the Teams to achieve a well structured response.

In both exercises the CBCCs used the Appendix A1 form to record the Initial Incident Assessment and summarised the known information effectively.

The initial CBCT activation arrangements were well considered by both CBCCs but the means to convey the message to the CBCT members lacked clarity and this should be reviewed to make the Plan more robust.

Both CBCCs decided to initiate the Plan in the absence of the HOPS – the Plan should be explicit that they, and other Heads of Service, have the authority to take this action.

In both exercises the Teams worked well and the CBCCs established effective working arrangements with good team chairing. Both teams got off to slightly slow starts – to some extent this is inevitable as the members of the team have to establish a modus operandi, however we considered that the CBCT could have benefited from having a pre-set agenda to provide a little more structure to the initial discussions.

In both exercises the Teams drew from the wide range of knowledge / expertise around the table. Where services were not represented this impaired the response of the Team to certain issues.

A common problem in both exercises was initially how to communicate quickly with staff that were based at Pathfinder House and what to tell them. There was a risk that staff who would be needed were being told to go home. It was also possible that Heads of Service would be giving different instructions to their team members. The challenge for the CBCC was to devise a communication strategy that kept operational options open and used effective communication channels.

The use of the summary chart for service priorities helped to provide a structure to the discussions and assisted the Teams in achieving a good focus on immediate service priorities.

In both exercises communications with Elected Members caused difficulties; a robust process to provide regular updates for Councillors needs to be devised. In the second exercise it was suggested that the Leader / Deputy Leader should be a single conduit for messages to and from other Councillors – we have seen this arrangement work well in other authorities.

The use of the whiteboard by both teams to record issues was helpful in keeping the teams focussed. In the first exercise there was greater clarity over the actions and also whether they had been completed.

In both exercises the log keepers found it difficult to take an accurate record and to keep a running

list of actions / issues. We recommend that there should be 2-3 loggists / support people identified for the CBCT.

Both logs were clear and well written. Because log sheets copied from the CBCP were used rather than log books the pages all bear the footer note Page 1 of 1. Pre-printed log sheets with consecutively number pages would help to ensure that pages do not get out of order and that they can be signed off at the end of the shift / incident. Log sheets should also include a box to record the name of the loggist so that an audit trail is established.

It was unclear in both exercises whether the evacuation arrangements for Pathfinder House would have been effective at the start of the day, when there may have been few staff available to carry out a 'sweep' of the whole building. It was also unclear to us as to how the liaison with NHS in the Civic Building would take place. The availability of copy building plans at Eastfield House was questioned in the second exercise. We suggest that the arrangements should be reviewed.

Taking both exercises together, there wasn't a completely consistent view on the robustness of the ICT back up arrangements and how quickly the servers could be switched over. We recognise that to some extent this is work in progress and would recommend that in the future the procedures are firmed up and fully tested.

In an incident of this type the role of the Council's insurers could be significant. The Insurers would want their loss adjusters on site ASAP and they would work with the Council to help minimise loss. It would be likely that the insurers would have useful contacts e.g. document recovery companies, temporary building suppliers, which could be utilised by the Council. We recommend that insurance company contacts and details of cover procured should be included within the CBCP.

Neither team made reference to inventories being available to help establish what might have been lost in the fire. If these are in place then they should be mentioned in the CBCP as they can provide a basis for assessing what needs to be replaced.

In the given scenario close liaison between the Business Continuity response and the Council's Emergency Planning response would have been critical; this was achieved in the exercises but the provisions in the Plan could be more explicit in this regard.

Both teams were tested during the exercises and to some extent found the pressure challenging. In a real incident it would be important for the CBCT to be able to manage shift changes effectively; whilst Deputy BCP coordinators are listed responsibility for managing shift changes could usefully be identified in the CBCP.

Both Teams provided thorough briefings for the HOPS and covered all the main issues requested.

## ■ Conclusions

The assessment of the workshops by the participants suggests that the structure, content and presentation were effective and that the objectives of the training were fully achieved.

Participants engaged fully and appeared to find the sessions very productive.

The Debrief Session at the end of each workshop identified a number of useful learning / action points to be carried forward – See Appendix 1.

We would like to record our thanks to Kate Adams who helped to set up the workshop.

	<b>Learning Points</b>	<b>Recommended Follow up Actions</b>
1	Copies of plans of the Council's buildings are held at Pathfinder House in the Emergency Grab Box and also at Eastfield House and at St Ives.	Check accuracy of this and include reference in Section 17.
2	Arrangements for Managers to contact all staff would be beneficial.	Consider establishing a 'call cascade tree' and contact centre number for staff to call.
3	The loss of Pathfinder House could be caused by a number of scenarios and there would be benefit in having a pre-prepared Communications Plan.	Include within Section 7 of the Corporate BCP (CBCP) a draft Communications Plan for loss of Pathfinder House.
4	Emergency Planning response in many scenarios needs to be more closely linked to the BC response.	Include within the Corporate BCP references to Emergency Planning response and in particular: <ul style="list-style-type: none"> <li>• LAIO role to report back from the scene.</li> <li>• Emergency Operations Centre at Eastfield House and resources which it could provide.</li> <li>• Media coordination with other agencies where emergency response is activated.</li> <li>• How staff and buildings will be prioritised between BCP and Emergency response (e.g. Rest Centres).</li> <li>• Review role of CCTV in the activation.</li> </ul>
5	There was a lack of clarity over how the CBCT will link to Heads of Service and the delegated authority held by members of the CBCT.	Clarify authority of CBCT members and how links to Heads of Service would be maintained to ensure that corporate decisions do not conflict with decisions being made within services. Ensure senior management support.
6	Both CBCCs activated the Plan in the absence of the HOPS.	The Plan should explicitly allow for CBCC / HOS to activate the CBCP.
7	With capacity for 75 people to work from home and log in but 200 people registered to do this the system could become overloaded.	Consider arrangements to manage excessive demand for home working e.g. shift arrangements.
8	Arrangements were unclear for liaising with NHS should there be an incident impacting on their premises at Pathfinder House.	Review liaison arrangements with NHS and include contacts within CBCP. Share BCP arrangements to ensure they are compatible.
9	It was suggested that fire arrangements for sweeping building to ensure it is empty in case of fire only effective within working hours – issue of what happens out of hours was unclear.	Review arrangements for checking building out of hours in the event of a fire.
10	It was unclear what process should be followed to notify next of kin in a case of	Include notification procedure within CBCP.

	fatality / injury of a member of staff.	
11	Two log formats included within the Plan. CBCT did not have ready access to log sheets.	Standardise log sheet format and provide pre-printed sheets to CBCT members. Consider enlarging 'action boxes' and adding box for loggist name.
12	The CBCT meeting lacked some structure at the start and the CBCT spent some time discussing matters in a low level of detail (e.g. catering).	Draft CBCT Initial Agenda to include in the CBCP.
13	Purchasing supplies and equipment may have been difficult.	Include arrangements for using Purchase Cards and extending limits within CBCP.
14	Summary Chart tabled at exercise showing 24 hr Priorities List was very useful in informing discussion.	Include summary chart within CBCP.
15	The use of a whiteboard to list issues helped focus discussion.	Provide pre-printed flipchart sheets to be used to keep track of issues and maintain a record.  Ensure that CBCT has a general loggist and an Issues Loggist.
16	Allocation of available accommodation was a challenge for the CBCT.	Complete work to populate Appendix A8.  Include any shared arrangements with the Library and NHS.
17	Without the availability of the Leader communications to Members were limited.	Review arrangements for communicating with Members during an incident.  Provide advice to Members about statements to the media.
18	The CBCT had difficulty keeping regular communications going with Members, Staff, the Public and other agencies.	Allocate communications lead on CBCT whose role it is to ensure that regular messages are issued. Chair to set frequency.
19	There was a lot of reliance on using the website for communicating with customers. Customers without internet access would be excluded.	Ensure that website and local radio are used fully to communicate with customers.
20	Unclear how long the stock of cheques at Eastfield House would last.	Review stock of chequebooks and increase if appropriate given lead in time of 15-20 working days to print new stock.
21	Contact arrangements for bank could be lost.	Ensure bank contact arrangements are included in CBCT.
22	Difficulty in contacting suppliers and landlords.	Provide back-up arrangements for suppliers and landlords contact details.
23	Contact for HR out of date.	Update HR contacts.

24	No SBCP for HR.	Provide HR BCP linking to LGSS.
25	Some of the Service Specific BCP Plans are incomplete.	Complete Service Specific BCP Plans.
26	Arrangements for switching servers to back up servers were uncertain.	Review IT BCP arrangements and test server switchover arrangements.
27	Need for constant reviews and updates.	Establish and resource programme of regular updates of the CBCP.
28	There was a lack of clarity over the Council's insurance arrangements.	Include details about Council's insurance cover within the CBCP.
29	There was a lack of clarity over communications with the Unions.	Review communication arrangements within the CBCP for ensuring unions /Staff Council are adequately informed.
30	There was no reference to inventories of assets within Pathfinder House.	If inventories exist then consider including reference to them within the CBCP.
31	If the exercise had been more prolonged it would have been necessary to manage a shift change for the CBCT.	Consider including shift change management responsibilities in the CBCP.
32	Delegates requested further training.	Develop arrangements for future training and exercises.

Whilst preparing the exercise we noted a few minor typos in the Draft Plan:

Log sheet in Service BCP has an extra column for expenditure not in the Log Sheet Appendix A3.

Appendix A10 has Malcolm Sharp listed not Joanna Lancaster. Terry Parker is also listed.

Last Para of: 3 Roles and Responsibilities - is out of context. Also refers to Terry Parker.

12. Emergency Purchasing Arrangements – change ‘extracting’ to ‘extract’

Suggest change heading of 13. Service Area Recovery Plans to ‘Service Specific BCP’ for consistency.

Appendix A7iii – rogue arrow head below ‘Issue’ box.

Reference in Glossary to ‘EBCT’ but this is not referred to in the Plan.

Contents shows Appendix A11 as ‘Proforma’ – add for ‘Emergency Purchases’.