Business Continuity Policy – version 1

Key Requirements:

- The Director of Health, Safety, and Business Continuity will ensure that an appropriate framework is created for the development, implementation and monitoring of a Business Continuity Management System (BCMS).

- Executive Dean and Heads of Professional Services are responsible for the implementation of the College’s BCMS within their area of responsibility.

- Heads of Department and Directors of Professional Services must have a business continuity plan to manage low level disruption locally.

- The BCEP Officer will identify appropriate levels of training and awareness for operational roles within the Incident Management Plan and develop a training program to meet the needs of these roles.

Definitions

**Business Continuity (BC).** The capability of the organisation to continue delivery of products and services at acceptable predefined levels following disruptive incident.

**Business Continuity Management (BCM).** A holistic management process that identifies potential threats to an organisation and the impacts to business operations those threats, if realised, might cause, and which provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities.

**Business Continuity Management System (BCMS).** Part of the overall management system that establishes, implements, operates, monitors, reviews, maintains and improves business continuity.

**Business Continuity Plan (BCP).** Documented procedures that guide organisations to respond, recover, resume and restore to a predefined level of operation following disruption.

**Business Impact Analysis (BIA).** The process of analysing activities and the effect that a business disruption might have upon them.

**Maximum Tolerable Period of Disruption (MTPD).** The time it would take for adverse impacts, which might arise as a result of not providing a product/service or performing an activity, to become unacceptable.

**Minimum Business Continuity Objective (MBCO).** The minimum level of services and/or products that is acceptable to the organisation to achieve its business objectives during disruption.

**Recovery Point Objective (RPO).** The point to which information used by an activity must be restores to enable the activity to operate on resumption.

**Recovery Time Objective (RTO).** The period of time following an incident within which a product or service must be resumed, or activity must be resumed, or resources must be recovered.
Director of Professional Service. Those senior managers within Professional Services with responsibility for a Directorate or Department. This includes roles such as Chief, Director, Assistant / Deputy Director, and Head of. The specific responsibilities will vary depending on the Directorate but will be aligned with either the Executive Dean and / or Head of Department.

References


Civil Contingencies Act 2004
Royal Holloway, University of London is committed to ensuring the highest academic standards and providing an excellent student experience through responsible management. As part of this commitment, the College will ensure it has the resilience to manage expected disruptions and has suitable processes and procedures in place to effectively respond to any incident.

Business Continuity Management (BCM) is a process that identifies and addresses potential threats of disruptions to business activities or processes. It involves building a framework for resilience to ensure an effective response to and recovery from potential threats, minimising disruption to business activities or processes.

The aim of having a Business Continuity Management System (BCMS) is to ensure the college is able to maintain its activities in the event of disruption. Therefore all Schools, Departments and Professional Services are expected to prepare, exercise, maintain and review Business Continuity Plans (BCPs) based on the principle that each area should be able to maintain its own critical activities in line with the Strategic intention of the college.

The College will provide information, instruction, and training to ensure that those with a defined roles within the business continuity framework are competent. In addition the College will plan and complete exercises to test various aspects of its plans, including working with external agencies as required.

We will collaborate with, contractors, professional bodies, and other Universities to our mutual benefit, and be open with our decisions and communications about any business continuity related activities or incidents. Consultation will be carried out with relevant parties before fundamental changes are made to any aspect of the Business Continuity Management System.

The senior management of this College is committed to this policy and its implementation. We expect every member of the College to share this commitment and work together to achieve it.

Signature

Principal

Signature

Deputy Principal (Operations)

Signature

Director of Health, Safety and Business Continuity
**Business Continuity Framework**

1. **Council** will seek assurance that business continuity and emergency planning is being appropriately managed through the Audit, Risk and Compliance Committee (ARCC).

2. The **Executive Board** is accountable for ensuring that business continuity and emergency planning is being appropriately managed by the college. The Executive Board will approve the Business Continuity Policy and the Major Incident Plan.

3. **The Deputy Principal (Operations)** is responsible for ensuring sufficient resources are provided to implement the BCMS.

   This responsibility includes ensuring there are sufficient competent managers of suitable seniority to fulfil the Silver cadre obligations.

   The College’s strategic business continuity objectives are to:
   
   - Ensure that the BCMS provides planning, processes, training and continuous improvement to manage operational incidents throughout the College
   - Identify, assess and minimise business continuity risk
   - Support the delivery of the College’s Strategy
   - Promote and maintain the College’s reputation
   - Align with ISO 22301:2019 Security and Resilience requirements
   - Promote a resilience culture by raising awareness and embedding business continuity

4. **The CFO** must ensure that financial support is available if BC arrangements are invoked.

5. **Executive Dean and Directors of Professional Services** are responsible for the implementation of the college’s BCMS within their area of responsibility.

6. **Heads of Department and Directors of Professional Services** are responsible for the implementation of the college’s BCMS within their area of responsibility. They may delegate the day-to-day responsibility for business continuity to individuals within their School/Department but remain ultimately accountable. They must ensure that:

   - They are aware of their responsibilities under the College’s business continuity policies and procedures
   - They have clearly defined roles and responsibilities during the managing of an incident.
   - Risks associated with their Departments activities are appropriately assessed and business continuity plans is in place and ready to implement
   - They escalate business continuity issues as required
   - Provide adequate resources during the managing of an incident

   The review and update of local departmental plans is managed within the relevant department and is the responsibility of the Head of Department or Director of Professional Service and their appointed Business Area Representative.

   BCP’s are to be validated at regular intervals to determine whether any changes are required to procedures and responsibilities. Planned review periods should not exceed 12 months. Plans should
have also been shared with those who have a role and responsibility in it and the current version uploaded to the intranet.

7. Heads of Department and Directors of Professional Services must appoint Business Area Continuity Representatives for their area.

8. The Director of Health, Safety, and Business Continuity will ensure that the Executive Board is provided appropriate professional advice on business continuity.

This includes the following:

- Developing the business continuity policy
- Advising of the application of relevant business continuity legislation via the Business Continuity and Emergency Planning Officer
- Managing the ongoing program of business continuity audits
- Ensuring the Business Continuity and Emergency Planning Forum is provided with reasonable assurance or is kept informed of any significant business continuity risks and any associated significant developments, concerns or issues
- Ensuring there is appropriate documentation identifying policy and guidance

9. The Director of Health, Safety, and Business Continuity will ensure that an appropriate framework is created for the development, implementation and monitoring of a Business Continuity Management System (BCMS).

The aim of the framework is to ensure Royal Holloway, University of London is a resilient organisation by developing, implementing and managing a robust and effective BCMS to protect the College’s operations, including its staff, students, visitors and contractors where reasonably practicable.

The following areas are all within the scope of the BCMS:

- Schools, departments and professional services
- College owned, operated, maintained and insured buildings
- Supply chain
- Commercial services
- Satellite sites

Exclusions from scope:

- Buildings we own but do not run
- Business critical service from external providers
- Private residential properties used by students
- Student Union
- Partner plans

This policy does not replace or supersede existing relevant policies or planning, instead it advocates the need for risk registers, incident reporting, plans for disruption and will work with the College's existing preparedness activities.

10. The Director of Health, Safety, and Business Continuity will provide EB will regular updates on the BCMS and will provide both EB and ARCC an annual assurance statement.
11. The Director of Health, Safety and Business Continuity will Chair the Business Continuity and Emergency Planning Forum.

The aim of the forum is to:

- Monitor the implementation of this policy
- Ensure appropriate structures are in place to implement effective Business Continuity arrangements
- Review business continuity standards and changes to the College's business continuity management system before approval

12. The Business Continuity and Emergency Planning Officer is responsible for the development and implementation of the Business Continuity Management System.

This includes:

- Provide specialist advice and guidance on BCM issues including the co-ordination, development, implementation and review of BC plans, processes and procedures
- Meet with identified business area representatives to establish routine and structure as well as the review of business impact analysis and plans on an annual basis or when necessary
- Work in partnership with Head of Security where necessary to risk assess current and future threats identified through horizon scanning and intelligence gathering
- Co-ordinating annual update of departmental BC plans
- Ensure that a culture of business continuity is embedded within the College through communication and the provision of awareness sessions, training and exercises to staff, according to their roles and needs
- Facilitate training, tests and exercises
- Provide recommendations and other management feedback as appropriate
- Represent the College in the wider higher education and external business continuity arena.

13. The Business Area Continuity Representatives will develop, implement and review BC plans, processes and procedures relevant to their area.

These Representatives will be supported by the Business Continuity and Emergency Planning Officer and have a key role in the planning and response arrangements for any risk or related incidents within their Department. This includes:

- Being a subject matter expert for their department and applying this to BC planning
- Developing and implementing BC plans for their department with support from other members of the department
- Reviewing and updating BC plans for their department on an annual basis or following an incident
- Attending Business Area Continuity Representatives meetings

Incident Management

14. Heads of Department and Directors of Professional Services must be able to manage low level disruption locally.

These events are those that result in short-term disruption to the Department that can be managed using existing procedures, although support can be sought from the BCEP Officer.
Heads of Department and Directors of Professional Services must escalate events that cannot be managed locally to the on call Silver, via the campus Security Office.

The Head of Security must ensure all Security personnel are aware of the Silver roster and know the correct activation procedure.

Incidents resulting in moderate disruption should initially be managed in the same way as a low level incident, but consideration should be giving to whether additional support is required from a wider pool of departments. If so consider whether the incident needs to be managed by activating the Command and Control structure within the Incident Management Plan. If there may be a need for this, the Silver Commander should be kept up-to-date throughout the incident so they are ready to activate if necessary. These incidents may require the use of departmental BCPs over existing procedures.

Incidents resulting in significant disruption should follow the process within the Incident Management Plan to activate the Command and Control structure and any relevant BCPs to manage and recover the incident.

Stand down will be a co-ordinated approach through the Command and Control structure, during the recovery phase. If Command and Control has not been activated it will be the relevant leading departments responsibility to stand down all support once recovery from the incident has been achieved.

Business Area Continuity Representatives must appropriately document all decisions made during the response to incidents managed at a School or Department level.

The On-call Silver must ensure that all decisions are appropriately documented for legal purposes.

For more significant incidents this may require the use of a trained loggist. The appropriate document for logging and debriefs can be found within the Incident Management Plan.

For incidents utilising the College’s Incident Management Plan, a more in-depth debrief will be co-ordinated by the Business Continuity and Emergency Planning Officer.

Hot debriefs should be conducted immediately following stand down of any incident to capture learnings to improve any procedure, process or BCP that was used. The BCEP Officer will ensure that all learnings and reviews are captured to support continuous improvement of all plans.

Training, Awareness and Exercising

The BCEP Officer will identify appropriate levels of training and awareness for operational roles within the Incident Management Plan and develop a training program to meet the needs of these roles.
21. The BCEP Officer will plan and organise exercises of the central BCPs and provide advice and support, if needed, on local exercising arrangements.

Douglas Searle
Director Health, Safety and Business Continuity
Version 1

Approved by: Executive Board
Date: 08 February 2022
To be reviewed: before February 2025
## Roles and Responsibilities

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Appendix 1 – Major Incident Management

Definition of a Major Incident (for information only)
A major incident is an actual or anticipated event which threatens:

1. The physical and/or psychological well-being of staff, students, visitors and third parties.
2. The College’s reputation.
3. The College’s property.
4. The College’s information, data or systems.

And is beyond the scope of resolution by normal decision-making mechanisms known as business as usual.

Major Incident Team Structure

The Major Incident Management Team comprises three components – Gold, Silver and Bronze. Gold has overall responsibility for the response, but sits back from the command activities in order to maintain a strategic view and retain governance. Silver has responsibility for the major incident command and control. Bronze will coordinate the response as necessary to implement the response.

The role of Silver is an on-call role held by volunteers within senior management positions of the College. To ensure a smooth transition from short-term disruptive incidents to major incidents Silver should be kept updated throughout short-term disruptive via Security who hold the on-call roster. Then if needed Silver can make the decision whether or not it is a major incident and stand up the rest of the Command and Control structure if necessary and follow major incident process as found in the Major Incident Management Plan (MIMP).

Gold and Bronze roles are not on-call roles like Silver, but a list of volunteers within the business willing to support at these levels during an incident.

Should more information be required on the major incident management process please refer to the MIMP.