

### Business Continuity Management Policy



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## Business Continuity Policy Statement

Business continuity can be defined as “The capability of an organisation to continue the delivery of products or services at pre-defined acceptable levels following a disruptive incident”. (BCI Good Practice Guidelines)

The aim of the University’s Business Continuity Management (BCM) Programme is to identify the main threats, which have the potential to disrupt priority activities and to develop measures which protect against interruptions, facilitate a response to incidents and support recovery.

The objectives of the University’s BCM Programme are to:

- Improve resilience within the University’s people, assets, systems and infrastructure
- Maintain contingency arrangements that are safe and secure for all personnel
- Develop procedures which promote continuity and facilitate the co-ordinated recovery of priority activities
- Support incident response and recovery with effective command and communication structures

By implementing the BCM programme, the University will be better prepared to effect a coordinated response to disruptive incidents

The University’s Faculties, Schools and Professional Services will be expected to identify potential threats to their activities, examine the impact of disruption and make local plans for responding to incidents in order to improve resilience. The University’s approach to procurement aims to ensure that such standards are expected where services are provided by contractors or third party suppliers.

All staff are expected to recognise and detect the risk of disruption to the core activities of their School or Division and report any concerns to management. Managers are expected to evaluate these risks, design and maintain documented business continuity plans to cope with disruption and agree response and recovery procedures with service providers and all team members.

These arrangements may involve certain staff undertaking temporary roles, or working at different times or in alternative locations. During disruptive incidents, staff may be asked to consider such changes to their normal working arrangements, to support the University throughout the resumption and recovery process. The University will ensure that any proposed alternative working arrangements are safe, secure, equitable and fit-for-purpose.

The University will strive to continually improve resilience across the institution, which should serve to reduce the impact of disruptive incidents.

The intention is for business continuity planning to become embedded in to the routine management activities that take place within the University’s Faculties, Schools and Professional Services.

## Introduction

Business Continuity Management (BCM) is a holistic process that identifies potential threats to the achievement of the University's objectives by examining the impact of disruption on its priority activities and providing a framework for the development of plans to respond to incidents.

The University's priorities can be broadly categorised as:

- Education and the student experience
- Research and enterprise
- External engagement
- Effective and efficient Professional Services

### 1. Purpose

The purpose of this Business Continuity Management Policy is to standardise and communicate the governing principles of the University's BCM arrangements, which will support the development and maintenance of BC Plans, promote awareness among staff and enhance resilience across the institution.

The establishment of a BCM Policy supports the achievement of the University's strategic objectives by implementing controls which mitigate the risk of disruption to priority activities.

The Business Continuity Management Policy will achieve this by stipulating the expected standards for:

- Identifying, reporting and monitoring BC risks and issues
- Developing solutions which protect priority activities from disruption
- Responding to incidents in order to support the resumption of priority activities
- Reviewing incident response arrangements and evaluating the effectiveness of BC plans
- Enhancing skills, knowledge, awareness and attitudes to improve resilience

### 2. Objectives

The objectives of the University's Business Continuity Management Policy are to:

- Protect the University, including its staff, students, researchers, visitors and interested parties, by providing a framework for assessing the risk of disruption and for responding to incidents
- Recognise and manage the impacts of disruptive incidents
- Understand the recovery requirements and capabilities of the University's priority activities
- Coordinate the recovery of priority activities to support the University's strategic objectives
- Support the promotion of business continuity principles, so that they become embedded in to the routine planning activities of the University's Faculties, Schools, Professional Services, subsidiaries and contractors.

This policy and associated documents have been created to help the University's Executive Team to achieve these objectives.

### 3. Scope

This policy will provide a framework that determines the expected standards which underpin the University's arrangements in preparing for, responding to and recovering from disruptive incidents. Therefore, this policy can be applied to all activities undertaken on behalf of the University of Sussex, in the UK or overseas, in order to fulfil its responsibilities and support the achievement of its strategic objectives.

This policy will be used to inform the expected business continuity standards when the University procures products or services from third party suppliers, contractors and contracted partners. The University will provide details to subsidiaries, tenants and other stakeholders about this Business Continuity Management Policy, upon request. Financial resilience and insurance arrangements are not specifically referred to in this policy.

#### **4. Governance**

The University of Sussex is expected, as a normal governance requirement, to have in place 'appropriate' controls for managing risks. Business continuity management is intended to mitigate the risk of disruption to the University's priority activities, thereby protecting the University from financial or reputational loss and/or non-compliance with legislation. Suitable governance arrangements are required to ensure that sufficient resources are allocated to develop, maintain and report on BCM arrangements and provide assurance to stakeholders.

The Senior Risk and Resilience Manager will be responsible for maintaining the University's BCM arrangements and raising awareness of the expected standards. The Senior Risk and Resilience Manager will be a member of the Operational Resilience Working Group, who will monitor the implementation of the University's BCM Policy. The Senior Risk and Resilience Manager will report developments in relation to this Policy to the General Counsel and Director of Governance and Compliance, who will act as the BC Policy Reviewing Manager. The Chief Operating Officer will act as the BCM Policy Sponsor, with overall accountability in this regard.

Significant updates to this BCM Policy will be considered by the Risk Management Board and reported to the Audit and Risk Committee.

#### **5. Standards and Requirements**

The standards contained within the BCM Policy are intended to complement those included in the University's Risk Management Framework and Health and Safety Policy. The University's BCM arrangements will aim to align with the standards as described in the BCI Good Practice Guidelines and ISO 22301. The BCM Policy will take account of all relevant regulatory requirements which apply to the UK Higher Education sector.

##### **5.1 Identifying Business Continuity Risks and Issues**

Executive Deans, Heads of School and Professional Services Directors are responsible for identifying the threats to 'business as usual' operations and assessing the impact of disruption upon their priority activities, over time. This process, known as Business Impact Analysis (BIA), will examine how disruption can affect the University's:

- Reputation
- Financial performance
- Strategic objectives
- People
- Regulatory and legal compliance

The BIA forms a key part of the BC planning process and will influence the prioritisation of resources to support recovery. The Senior Risk and Resilience Manager will provide support to Faculties, Schools and Professional Services to ensure that BIAs are undertaken effectively and at suitable intervals.

##### **5.2 Protecting Priority Activities**

Executive Deans, Heads of School and Professional Services Directors are expected to identify and implement suitable mitigation measures, which will protect their priority activities from disruption. Faculties which are reliant upon the availability of specialist equipment and unique materials for education and research should make specific, local contingency arrangements to protect them against interruptions or other disruptive incidents.

Provision should be made to maintain laboratory conditions for vital ongoing experiments, such as auxiliary power supplies, reserve stocks of chemicals or materials, safe access arrangements and fire suppression. Faculties, Schools and Professional Services are expected to improve resilience by preparing for disruption and adopting alternative ways of working which are suitable, sufficient, safe and secure when incidents arise. The University's Business Continuity Plan provides detailed guidance and templates for maintaining local arrangements as well as more generic procedures to inform members of the University's Executive on how to respond to incidents.

### 5.3 Responding to Incidents

In addition to the University's Business Continuity Plan, the standards set out in this BCM policy will be given due consideration when preparing the University's Incident Response Guidance and local incident response plans, as well as the IT Disaster Recovery, Service Continuity and Crisis Communications Plans and those of contractors.

- **Incident Response Guidance.** This Guidance document defines incidents based on their size and scale and specifies the management structure required to respond effectively, as indicated in the table below:

Incident Type	Description of Impact	Response
Critical	Isolated incident with no ongoing threat Short-term service disruption (< 1 day) Barely noticed by students, staff or stakeholders	Normal Operational (Bronze Command)
Significant	Schools/services activities suspended Medium-term service disruption (> 1 day) BC Plans may be invoked to support recovery	Tactical Co-ordination (Silver Command)
Major	Loss of facilities, equipment or personnel Prolonged University-wide disruption (2 days+) Activities suspended, prolonged recovery time	Strategic Management (Gold Command)

- **Faculty/School/Divisional/Contractors BC Plans.** Procedures which facilitate the local operational response to incidents which may pose a threat to life, property, the environment or priority activities and may involve evacuation and close liaison with the emergency services. Overseen by the relevant Executive Dean/Director.
- **IT Disaster Recovery & Service Continuity Plans.** Procedures to maintain resilience within the University's technology infrastructure to support Cyber Security, Service Continuity and Disaster Recovery Planning in IT Services. Arrangements to prepare for and respond to incidents and outages and to protect data from hostile attacks, theft or misuse. The Director of IT Services will monitor resilience within the University's technology environment and oversee IT Service Continuity, Cyber Security and Disaster Recovery arrangements.
- **Crisis Communications Plan.** Procedures which provide senior management with sufficient information to support decision making and deliver timely and effective communications to warn and inform all stakeholders throughout the duration of an incident. Overseen by the Director of CEA.
- **Crisis Management.** Guidance to assist senior management in responding to an unstable, irrational incident that creates a severe level of disruption, which has the potential to affect the strategic objectives of the University. The impact of a crisis may exceed what could have reasonably been expected and therefore response plans may not exist or they may be insufficient to manage the full impact of the incident.

The Senior Risk and Resilience Manager will support the work of the Operational Resilience Working Group who will review and undertake the necessary planning activities for the operational and tactical response to incidents which may affect the University community.

## **5.4 Enhancing Skills, Knowledge, Competence, Awareness and Attitudes**

Effective Business Continuity Management will improve resilience across the institution. Senior leaders within schools and professional services will be expected to promote preparedness by discussing, documenting and testing procedures which introduce appropriate alternative ways of working when 'business as usual' is disrupted.

As the University is an adaptive learning organisation, Executive Deans and Professional Services Directors will be expected to evaluate disruptive incidents by commissioning de-brief sessions and documenting the findings. De-brief sessions may be supported by the Senior Risk and Resilience Manager and will review the effectiveness of the response, identify any lessons which have been learned and any new risks or opportunities which may have arisen as a result of the incident. De-brief sessions will involve University staff and those of relevant contracted partners.

## **6. Business Continuity Management - Roles and Responsibilities**

The roles and responsibilities defined in this BCM Policy refer to the requirements for implementing the BCM programme. The roles and responsibilities of senior managers who are required to respond to disruptive incidents are specified in the University's Business Continuity Plan.

### **6.1 Responsibilities of the University Executive Team**

UET will be responsible for:

- Appointing one or more competent persons to oversee the development and implementation of this policy and related procedures.
- Endorsing this Policy and ensuring that it is applicable to the University of Sussex.
- Ensuring that the University's Faculties, Schools, Professional Services and contracted partners maintain documented incident response and business continuity plans which will seek to preserve priority activities when faced with disruption having identified any known vulnerabilities or interdependencies, whilst respecting the safety and welfare needs of personnel.
- Making this Policy and information about business continuity available to staff, students, contracted partners, suppliers and stakeholders with an interest in resilience at the University of Sussex.

### **6.2 Responsibilities of Executive Deans, Heads of School and Professional Services Directors**

Executive Deans, Heads of School and Professional Services Directors are responsible for ensuring compliance with University policies. The extent to which they are required to comply with the standards outlined in this Policy will be determined by the risk of disruption faced by the relevant Faculty, School or Professional Service.

Faculties, Schools and Professional Services which are deemed as being at lower risk are advised to periodically discuss business continuity with the Senior Risk and Resilience Manager, agree alternative ways of working with their teams and maintain documented procedures for mobilisation should an incident occur.

Faculties, Schools and Professional Services must have robust plans in place to support the wellbeing of staff and students who may be affected by disruptive incidents whilst undertaking activities on behalf of the University in all locations around the world. These plans will specify the necessary arrangements for responding to incidents that occur in different time zones and include a suitable out-of-hours response by the relevant University staff.

Schools and services who oversee more time-sensitive activities and events are expected to develop and maintain specific Business Continuity Plans detailing their incident response procedures in the event of disruption. Should these plans require resources from (or action by) another Faculty, Service or third party supplier details of their preparatory, response and recovery arrangements must be pre-agreed and specified in the documentation.

Executive Deans, Heads of Schools and Professional Services Directors with such time-sensitive activities will identify a member of staff who will liaise with the University's Operational Resilience Working Group to:

- examine the risk of disruption and undertake an activity Business Impact Analysis (BIA)
- ensure that any recently introduced activities, processes and/or equipment are considered in BC planning
- develop and maintain local BC Plans, which will identify the specific alternative arrangements that are necessary to support priority activities, such as sensitive research projects or high-profile events
- identify a group of key staff to act as the Incident Response Team who will implement the response to local incidents, know escalation protocols and communicate details to the relevant suppliers and stakeholders
- ensure that local procedures are resilient when responding to out-of-hours incidents
- disseminate information to staff, suppliers and other relevant stakeholders to promote awareness of BCM and ensure that responsibilities are known and understood
- ensure that local BC capabilities and requirements are known by and agreed with contracted partners
- review local business continuity arrangements at least every 3 years or following applicable incidents

Faculties and Schools with teaching or research activities which are dependent on specialist equipment and materials or historical records and unique artefacts will maintain specific local BC plans which enable them to cope with disruptive incidents. Executive Deans and Heads of School will agree local contingencies and incident response arrangements with SEF, Estates, IT, suppliers and contractors upon whom they are dependent. School BC Plans will be approved by the Head of School and reported to the Executive Dean and the Provost, prior to sign-off in the University's Management Compliance Handbook. School BC Plans will be reviewed at least every 3 years.

### **6.3 Responsibilities of the Operational Resilience Working Group Members**

This Group will be responsible for periodically reviewing the provisions of this BCM Policy and evaluating the implementation of BCM across the University. As Chair of this Group, the Senior Risk and Resilience Manager will be responsible for reporting policy updates to the UEB Risk Management Board. The Operational Resilience Working Group membership will include:

- Senior Risk and Resilience Manager (Chair)
- Head of Service Delivery – Estates and Facilities Management
- Senior Security Manager – Estates and Facilities Management
- Head of Residential Facilities Management (SEF)
- Head of Health and Safety
- Head of Wellbeing, Therapeutic Support and Residential Life
- Senior Internal Communications Manager
- Assistant Director - IT Operations
- Cyber Security Manager
- Insurance Manager
- Head of Global Mobility
- Head of Technical Services
- Heads of Faculty Operations



The Group will meet at least twice per year and the main activities will include:

- Review the group's Terms of Reference and the scope of the University's BCM programme
- Evaluate risk and incident reports received from the Faculties, Schools and Professional Services
- Collect and examine BIA information to identify risks across the University's priority activities
- Review and monitor the effectiveness of relevant policies, plans and procedures, including this BCM policy
- Consider the latest Risk and BC good practice guidance
- Take action to address non-compliance with the University's approved BCM arrangements
- Develop the training and exercising programme and identify resource requirements
- Evaluate the success of the programme to promote BCM and resilience across the institution

#### **6.4 General BC Responsibilities**

##### **6.4.1 Managers will be expected to:**

- discuss BC risks with their teams; then agree and confirm alternative working arrangements
- maintain suitable and sufficient business continuity plans – documented procedures which ensure that their team's priority activities can operate to pre-defined, acceptable levels during disruptive incidents, whilst prioritising the safety and welfare of personnel
- promote BCM to embed a culture of resilience within the team, which supports the University's objectives
- ensure that alternative working arrangements are suitable, safe and secure
- follow procedures to communicate effectively with the team and senior management during an incident
- adhere to decisions made under the University's approved incident response arrangements

##### **6.4.2 All staff will be expected to:**

- be aware of the University's Business Continuity Management Policy
- report the risk of disruption and disruptive incidents/near-misses to management
- be prepared for disruption and ready to adopt pre-agreed alternative working arrangements
- be aware of their individual roles as set out in relevant local BC and incident response plans
- attend BC training, exercises and de-brief sessions as required

#### **6.5 The Responsibility of Suppliers and Contracted Partners**

The University works closely with suppliers and contracted partners who hold responsibility for the continuity of numerous priority activities, such as essential campus operations which are operated by Sussex Estates and Facilities (SEF) and Chartwells. The relevant contracts will be monitored by the University including performance reporting against Service Level Agreements (SLAs), to include Key Performance Indicators (KPIs).

To meet the required standards, SEF, Chartwells, other contractors and suppliers are expected to maintain robust business continuity plans which specify arrangements for the continued delivery of their services and products, which support the University's priority activities. These BC plans must include documented procedures which are aligned with the University's Incident Response Guidance, Business Continuity Plan and Crisis Communications Plan.

Suppliers and Contractors' BC plans must be reviewed annually (or following invocation) and updates will be reported to the Senior Risk and Resilience Manager for approval by the University's BC Policy Sponsor. Contractors and relevant suppliers will be consulted during the review of this policy to ensure that they are aware of the precise nature of the University's BC requirements.

## **7. Training and Awareness**

### **7.1 Raising Business Continuity Awareness**

The Senior Risk and Resilience Manager will develop and deliver a programme of activity to raise awareness of Business Continuity across the institution. This will include the creation of information on the University website and an e-learning module for all staff, liaising with key staff who are routinely involved in the BCM process, promoting resilience and supporting the delivery of training events and exercises.

### **7.2 Training**

The intention of BCM training activities will be to enhance understanding of the principles of the BCM process and to promote resilience within the University's Faculties, Schools and Professional Services. The Senior Risk and Resilience Manager will support the delivery of training (either directly or in partnership with external providers) to develop competence among staff who play a role in BCM, such as:

- Undertaking Business Impact Analysis (BIA)
- Developing BC Plans and procedures
- Creating resilient incident response and recovery processes
- Maintaining the decision log and action plan
- Facilitating review and de-brief sessions to capture learning

Further training is recommended for staff with tactical or strategic roles and responsibilities as defined in the BC documentation. Such training may be delivered by external facilitators and could include:

- Strategic Incident Management
- Command and Control
- Crisis Communications
- BCM Programme Development

### **7.3 Exercising**

The overall aim of incident exercises is to validate BC plans. The Senior Risk and Resilience Manager will support the development and delivery of exercises for the University's Faculties, Schools, Professional Services and Senior Management as required. The primary method of delivery will be via desk-top exercises using realistic incident scenarios. Staff with a role in BC planning and incident response will be expected to participate in exercises and review their local arrangements accordingly.

As BC Plans mature across the institution, it may become appropriate to plan and deliver occasional 'live play' exercises, providing that they are controlled adequately and do not compromise education, the student experience or the safety of personnel. Live exercises may require input from external facilitators and the involvement of partners from the Local Resilience Forum. In all cases, an exercise de-brief will be held to capture any learning.

## **7.4 Developing and Embedding a Culture of Resilience**

One of the intentions of the University's BCM programme is to promote and enhance resilience in routine working practices. All staff will be encouraged to consider their role in this and when appropriate, challenge the way things are done.

Through the implementation of this BCM Policy, staff will become more aware of emerging risks and how to prepare for and respond to disruptive incidents. For this reason, it is advisable to occasionally include BC as an agenda item at team meetings. The Senior Risk and Resilience Manager will monitor developments in business continuity and incorporate examples of good practice, in order to promote the benefits of resilience across the institution.

## **8. Distribution**

This BCM Policy will be circulated to all those who are responsible for undertaking reviews and agreeing updates to BC Plans. This Policy will be made available to all staff via the University of Sussex website. Contracted partners, stakeholders and other interested parties will be sent copies upon request.

## **9. Monitoring**

The monitoring and evaluation of this BCM Policy will be undertaken by the Operational Resilience Working Group. The Senior Risk and Resilience Manager will report any BCM Policy updates to the BC Reviewing Manager and BC Sponsor.

The effectiveness of the BCM Policy will be monitored periodically via internal audit and during the incident and exercise de-brief process. The most recent edition of the BCI's Good Practice Guidelines will be used as a benchmark to monitor the overall effectiveness of the University's BCM programme.

Strategic risks identified by the BCM programme will be considered under the University's Risk Management Framework and included in the Institutional Risk Register as appropriate. The University's Institutional Risk Register is subject to regular review by the University Executive Group and further scrutiny by the Audit and Risk Committee.

## **10. Business Continuity Planning Guidance and Templates**

This BCM Policy is supported by guidance on developing BC plans, including document templates, which can be found in Part 2 of the University's Business Continuity Plan and on the University website.

## **11. Business Continuity Management Policy Review**

This BCM Policy will be subject to review every three years in consultation with the Health & Safety Committee. Significant updates to this Policy will be considered by the University Executive Board and reported to the Audit and Risk Committee.

The BCM Policy will be reviewed in the light of any significant changes to legislation, market conditions or to the strategic objectives of the University. BCM Policy reviews will be undertaken by the Operational Resilience Working Group and will give due consideration to the University's risk appetite, established BCM standards and examples of good practice from within the Higher Education sector.

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## 12. Glossary

Term	Abbreviation	Definition
Business Continuity	BC	The capability to continue activities at pre-defined acceptable levels during a disruptive incident.
Business Continuity Management	BCM	A process that examines the risk of disruption and provides a framework for an effective response capability which develops resilience and protects institutional objectives.
Business Continuity Plan	BCP	Documented procedures and guidance to inform those involved in the response to disruptive incidents.
Business Impact Analysis	BIA	A process to examine the impact of disruption upon an organisation's activities, over time.
Crisis		An unstable, irrational incident that creates a severe level of disruption and affects the University's objectives. Existing plans and procedures may be insufficient as the impact exceeds foreseeable levels.
Disaster Recovery Plan	DRP	Procedures for restoration and resumption of IT systems, applications, services, data, telephony and connectivity following an outage or interruption.
Emergency Management Plan	EMP	School/Divisional procedures which define the response to incidents which pose an immediate threat to life, property or the environment.
Incident		A situation that can cause disruption, damage, harm or loss.
Incident Response Guidance	IRG	The University's approved Guidance which define types of incident and how the required response arrangements will be coordinated.
Institutional Risk Register	IRR	A record of the University's main risks, which have the potential to affect its strategic objectives.
Priority Activities		Activities which will require urgent attention during the response to an incident, in order to mitigate the impact of disruption.
Recovery Time Objective	RTO	The period of time following a disruptive incident within which an activity should be resumed to avoid unacceptable consequences.
Resilience		The ability to cope with, adapt to and recover from difficulties.
Risk		Uncertainty of outcome, with the potential to cause harm, damage, loss or other undesirable consequences, such as not achieving objectives.
Risk Appetite		The amount and type of risk that the institution will need to take in order to achieve its objectives.
Risk Tolerance		The maximum amount of risk the institution is prepared to accept in relation to a particular activity.
Situation Report	SITREP	Brief report of the impact of an incident (known facts), any risks that have arisen and any ongoing response activities using the Red, Amber Green (RAG) rating system.