### Document Version Control

<table>
<thead>
<tr>
<th>Date</th>
<th>Version</th>
<th>Author</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st June 2018</td>
<td>1.0</td>
<td>Ben Toogood</td>
<td>This version introduced in line with GPG 2018</td>
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<tr>
<td>1st March 2019</td>
<td>1.0</td>
<td>Ben Toogood</td>
<td>Minor edits to reflect organisational change</td>
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<tr>
<td>1st April 2019</td>
<td>1.0</td>
<td>Ben Toogood</td>
<td>Minor edits to job titles</td>
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Owner: Chief Operating Officer  
Last updated: May 2019  
Version: 1.0
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 2018)

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 assets, systems and infrastructure
- Develop alternative working arrangements that are safe and secure for all personnel
- Facilitate the co-ordinated recovery of priority activities
- Support incident response and recovery with effective communications

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

The University’s Schools and Professional Services will be expected to identify potential threats to their operations, examine the impact of disruption and make local plans for responding to incidents in order to improve resilience. Those Schools and Divisions with responsibilities for higher risk or business critical activities will prepare specific plans to deal with interruptions, to enable recovery to commence within an acceptable time. 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 Service and report any concerns to management. Managers are expected to evaluate these risks, design and maintain 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 performing temporary roles, at different times or in alternative locations. It is acknowledged that during disruptive incidents, staff may be asked to consider such changes to their normal working arrangements, to support the University throughout the recovery process. The University will ensure that any suggested alternative working arrangements are safe, secure 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 practices to become embedded in to the routine planning activities that take place within the University’s Schools and Professional Services.

Professor Adam Tickell
Vice-Chancellor
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
- 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 and reporting BC risks and issues
- Proposing mitigation measures 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 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 Schools and Professional Services

This policy and associated documents have been created to help the University’s senior management 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, which 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 suppliers and contractors. The University will provide details to 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. Governance is required ensure resources are allocated to develop, maintain and report on BCM arrangements and provide assurance.

The Risk and Business Continuity Manager will be responsible for maintaining the University’s BCM arrangements and raising awareness of the expected standards. The Risk and BC Manager will be a key member of the Incident Management Group, who will review this policy and the implementation of the University’s BCM arrangements. The Risk and BC Manager will report developments in relation to this policy to the Director of Planning and Performance, who will act as the BC Reviewing Manager. The Chief Operating Officer will act as the BC Sponsor and will retain overall accountability in this regard.

The University’s BCM arrangements will be overseen by the Audit and Risk Committee, in consultation with the Health & Safety 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 BCI Good Practice Guidelines 2018 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

Heads of Schools 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

The BIA forms a key part of the BC planning process and the outputs will influence the prioritisation of resources to support recovery. The Risk and Business Continuity Manager will provide support to Schools and Professional Services to ensure that BIA is conducted effectively.

5.2 Protecting Priority Activities

Heads of Schools and Professional Services Directors are expected to propose and implement mitigation measures, which protect their priority activities from disruption. Schools who 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 disruption.
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. 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 the University’s senior management.

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 Protocol and Emergency Management Plan, as well as the IT Service Continuity and Crisis Communications procedures.

• **Incident Response Protocol.** The IRP defines incidents based on their size and scale and specifies the management structure required to respond effectively, as indicated in the table below:

<table>
<thead>
<tr>
<th>Incident Type</th>
<th>Description of Impact</th>
<th>Response</th>
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<tbody>
<tr>
<td>Critical</td>
<td>Isolated incident with no ongoing threat, short-term service disruption (&lt; 1 day)</td>
<td>Normal Operational (Bronze Command)</td>
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<tr>
<td></td>
<td>Barely noticed by students, staff or stakeholders</td>
<td></td>
</tr>
<tr>
<td>Significant</td>
<td>Schools/services activities suspended, medium-term service disruption (&gt; 1 day)</td>
<td>Tactical Management (Silver Command)</td>
</tr>
<tr>
<td></td>
<td>BC Plans may be invoked to support recovery</td>
<td></td>
</tr>
<tr>
<td>Major</td>
<td>Loss of facilities, equipment or personnel, prolonged University-wide disruption (2 days+)</td>
<td>Strategic Management (Gold Command)</td>
</tr>
<tr>
<td></td>
<td>Activities suspended, prolonged recovery time</td>
<td></td>
</tr>
</tbody>
</table>

• **Emergency Management Plan.** Procedures which facilitate the University's response to incidents which pose an immediate threat to life, property or the environment and may involve evacuation and close liaison with the emergency services.

• **IT Service Continuity.** Specific procedures to examine the resilience of the University's technology infrastructure to support IT Disaster Recovery Planning and Information Security. Arrangements to prepare for and respond to outages and protect data from attack, theft or misuse. The Director of IT Services will monitor resilience within the University’s technology environment and oversee IT Service Continuity 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.

• **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 specific response plans may not exist.

The Risk and BC Manager will advise the Incident Management Group who will review and undertake the necessary planning activities for the operational, tactical and strategic response to incidents which affect the University.
5.4 Enhancing Skills, Knowledge, Awareness and Attitudes

Effective Business Continuity Management will improve resilience across the institution. Schools and 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 an adaptive learning organisation, Heads of Schools and Professional Services Directors will be expected to evaluate disruptive incidents by undertaking de-brief sessions and documenting the findings. De-brief sessions may be supported by the Risk and Business Continuity 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.


The roles and responsibilities defined in this BCM Policy refer to the requirements for implementing the BCM programme. The roles and responsibilities for 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 Group

The UEG is responsible for:

- Appointing one or more competent persons to oversee the development and implementation this policy and related procedures
- Endorsing this policy and ensuring that it is applicable to the University of Sussex
- Ensuring that the University’s Schools and Professional Services have documented business continuity plans which identify their vulnerabilities and interdependencies and protect their priority activities
- Making this policy and information about business continuity available to staff, students, partners and stakeholders who may be affected by disruption at the University of Sussex.

6.2 Responsibilities of Heads of Schools and Professional Services Directors

Heads of Schools 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 School or Service.

Schools and services which are deemed as being at lower risk are advised to discuss business continuity with the Risk and Business Continuity Manager, agree alternative ways of working with their teams and document the relevant processes for mobilisation should an incident occur.

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, whilst away from the campus. These plans will specify the necessary arrangements for responding to incidents that occur in different time zones around the world, to include an out-of-hours response by the relevant University staff.

Schools and services in which there are higher risk activities are expected to develop and maintain specific Business Continuity Plans detailing their incident response arrangements in the event of disruption. Should these plans require resources from (or action by) another School or Service, all relevant aspects of their response arrangements must be agreed in advance.
Heads of Schools and Professional Services Directors with higher risk activities will identify a member of staff who will liaise with the University’s Incident Management Group to:

- examine the risk of disruption and undertake a Business Impact Analysis (BIA)
- ensure that any recently introduced activities or processes 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 high profile research
- identify a group of staff to act as the Local Incident Management Team (LIMT) who will implement the tactical response to local incidents
- ensure that local procedures are resilient when responding to out-of-hours incidents
- disseminate information to staff and stakeholders to promote awareness of BC and ensure that responsibilities are understood
- ensure that the relevant local BC capabilities and requirements are known by contracted partners
- review local business continuity arrangements following incidents or exercises

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. The Head of School will agree local contingencies and incident response arrangements with SEF, Estates, IT and other providers upon whom they are dependent. School BC Plans will be approved by the Head of School and reported to the Provost.

6.3 Responsibilities of the Incident Management Group Members

The Incident Management Group will be responsible for reviewing the BCM Policy and evaluating the implementation of BCM across the University. The Risk and BC Manager will be responsible for reporting policy updates to the Audit and Risk Committee, in consultation with the Health and Safety Committee. The Incident Management Group membership will include:

- Risk and Business Continuity Manager (Chair)
- Emergency Management Advisor (Vice Chair)
- Head of Security
- Head of Student Services/Campus Support
- Head of Residences/Housing
- Head of Communications and External Affairs
- Head of International Programmes
- Head of IT Service Delivery
- Head of Health and Safety
- Head of Service Delivery/Contract Manager for Estates and Facilities
- Insurance Manager
- School Administrators/Technicians who are responsible for BC
- Invited academic advisers
The Incident Management Group will meet four times per year and the main activities will include:

- Agree the group’s Terms of Reference and the scope of the BCM programme
- Evaluate incident reports received from the Schools and Professional Services
- Examine BIA information to identify and risk assess the University’s priority activities
- Review and update relevant policies, plans and procedures, including this BCM policy
- Consider the latest BC good practice guidance
- Take action to address any audit recommendations
- Develop the training and exercising programme and identify resource requirements
- Devise a programme to promote BCM and resilience across the institution

6.4 General BC Responsibilities

Managers will be expected to:

- discuss BC risks and alternative working arrangements at team meetings
- maintain and test suitable and sufficient business continuity plans, which ensure that their team’s priority activities can operate to pre-defined, acceptable levels during disruption
- 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
- communicate effectively with the team and senior management during an incident
- adhere to decisions made under the University’s approved incident response arrangements

All staff will be expected to:

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

6.5 The Responsibility of Contracted Partners

The University works closely with 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 are monitored by the University including performance reporting against Service Level Agreements (SLAs).

To meet the required standards, SEF and Chartwells are expected to maintain robust business continuity plans which specify arrangements for the continued delivery of their contracted 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 Protocol and Crisis Communications Plan.
Contractors’ plans must be reviewed annually (or following invocation) and updates will be reported to the Risk and BC Manager for approval by the University’s BC Sponsor. Contractors will be consulted during the review of this policy to ensure that they are aware of the precise nature of the BC requirements.

7. Training and Awareness

7.1 Raising Business Continuity Awareness

The Risk and BC Manager will be responsible for delivering a programme of activity to raise awareness of Business Continuity across the institution. This will include the development of an e-learning module for all staff, liaising with key staff who are routinely involved in the BCM process, promoting resilience and facilitating 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 Schools and Professional Services. The Risk and BC Manager will facilitate training to develop competence among staff who play a role BCM, such as:

- Undertaking Business Impact Analysis (BIA)
- Developing BC Plans
- 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 Risk and BC Manager will work with colleagues to plan and deliver exercises for the University’s Schools, Professional Services and Senior Management. 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 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.
7.4 Developing and Embedding the Resilience Culture

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 respond when faced with disruption. For this reason, it is advisable to occasionally include BC as an agenda item at team meetings. The Risk and BC 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. The policy will be made available to all staff via the University of Sussex website. 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 Incident Management Group. The Risk and Business Continuity Manager will report any BCM Policy updates to the BC Reviewing Manager and BC Sponsor.

The effectiveness of the BCM Policy will be monitored 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 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.


This BCM Policy will be subject to formal review every three years in consultation with the Health & Safety Committee. Updates will be overseen by the University Executive Group 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 Incident Management 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.

University of Sussex Business Continuity Management Policy
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This Version: May 2019 Next Review Date: August 2022
12. Glossary of Related Terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Abbreviation</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Business Continuity</td>
<td>BC</td>
<td>The capability to continue activities at pre-defined acceptable levels during a disruptive incident.</td>
</tr>
<tr>
<td>Business Continuity Management</td>
<td>BCM</td>
<td>A process that examines the risk of disruption and provides a framework for an effective response capability which develops resilience.</td>
</tr>
<tr>
<td>Business Continuity Plan</td>
<td>BCP</td>
<td>Documented procedures and guidance to inform those involved in the response to disruptive incidents.</td>
</tr>
<tr>
<td>Business Impact Analysis</td>
<td>BIA</td>
<td>A process to examine the impact of disruption upon an organisation’s activities, over time.</td>
</tr>
<tr>
<td>Emergency Management Plan</td>
<td>EMP</td>
<td>Procedures which define the University’s response to incidents which pose an immediate threat to life, property or the environment.</td>
</tr>
<tr>
<td>Incident</td>
<td></td>
<td>A situation that can cause disruption, damage, harm or loss.</td>
</tr>
<tr>
<td>Incident Response Protocol</td>
<td>IRP</td>
<td>The University’s documented procedures that define types of incident and how the required response arrangements will be coordinated.</td>
</tr>
<tr>
<td>Institutional Risk Register</td>
<td>IRR</td>
<td>A record of the University’s main risks, which have the potential to affect its strategic objectives.</td>
</tr>
<tr>
<td>Priority Activities</td>
<td></td>
<td>Activities which will require urgent attention during the response to an incident to mitigate the impact of disruption.</td>
</tr>
<tr>
<td>Recovery Time Objective</td>
<td>RTO</td>
<td>The period of time following a disruptive incident within which an activity should be resumed to avoid unacceptable consequences.</td>
</tr>
<tr>
<td>Resilience</td>
<td></td>
<td>The capacity to recover quickly from difficulties.</td>
</tr>
<tr>
<td>Risk</td>
<td></td>
<td>Uncertainty of outcome, with the potential to cause harm, damage, loss or other undesirable consequences.</td>
</tr>
<tr>
<td>Risk Appetite</td>
<td></td>
<td>The amount and type of risk that the institution will pursue in order to achieve its objectives.</td>
</tr>
<tr>
<td>Risk Tolerance</td>
<td></td>
<td>The maximum amount of risk the institution is prepared to accept in relation to a particular activity.</td>
</tr>
<tr>
<td>Situation Report</td>
<td>SITREP</td>
<td>Brief report of the impact of an incident and the response efforts using the Red, Amber Green (RAG) rating system.</td>
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</tbody>
</table>