

BUSINESS CONTINUITY POLICY



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This document sets out the University's business continuity policy.

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Executive Sponsor	Executive director of HR and OD
Officer Responsible for Policy/ Procedures	Director of Health Safety and Business Continuity
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To be reviewed annually and/or when major organisational change occurs.

INTRODUCTION AND CONTEXT

The loss, or disruption of Aston University critical activities requires an effective Business Continuity plan. Good business practice, health and safety duty of care, student expectations and increasing regulatory requirements dictate that we have proactive plans and procedures to enable us to respond to and manage a major incident or business interruption.

The University will have in place a strategy, implemented solutions and documented business continuity plans. Achieving these objectives form part of an on-going commitment to ensure our strategy, solutions, documentation and staff awareness, remains current and effective.

This document describes the key elements of Business Continuity at Aston University. It is divided into the following sections:

Business Continuity Planning Policy

Demonstrates the university's commitment to protecting its people, assets, reputation and educational activities.

• Roles & Responsibilities

A definition of the key roles in preparing to meet, and recover from, any major incident that threatens the continued operation of the University's academic operations. Responsibilities both pre and post incident are described here.

Business Continuity Planning Standards

Business Continuity Planning Standards by which Aston University will implement the Business Continuity Planning Policy.

The Business Continuity Policy & Standards document is designed for use by all of its faculties and supporting departments. The Policy & Standards supplement any regulatory or legislative obligations to protect our people, assets, reputation or essential business functions and services.

The Standards embody the principles of Aston Business Continuity Policy endorsed by the Executive Team. The Standards represent the minimum requirements for the University's Business Continuity Management System (BCMS).

1. TERMINOLOGY

Terminology in use throughout this and all other documents that together form the Aston University Business Continuity Management System (BCMS).

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Emergency		Any event which requires an immediate response to contain the situation and prevent to event from escalating or worsening
Incident	-	Any event that threatens our people, assets or reputation or seriously impairs, disrupts or halts essential academic operations and activities.
Business Continuity Planning	BCP	The ability to continue key university operations in the event of any incident that interrupts normal business at the university.
Business Continuity Plan	BCP	The university's plan for escalating, addressing and recovering from a significant incident.
Business Continuity Management System	BCMS	The management process by which Business Continuity eco system, plans and procedures are developed, implemented, tested and maintained.
Business Continuity Manager	BCM	The person tasked with day-to-day responsibility for ensuring that the university adheres to the Business Continuity Management regime.
Business Continuity Champion	BCC	The person in each School and support department responsible for owning and ensuring the School and departmental plans are current.
Risk Assessment	RA	The process by which the university assesses its key risks for which it requires a Business Continuity Plan.
Business Impact Analysis	BIA	The process by which the university decides upon recovery priorities, timescales and minimum recovery resources
Vice Chancellors Response Team	VCRT	The university's strategic level business continuity planning and response team.
Critical Incident Response Team	CIRT	The university's tactical level business continuity planning and response team.

2. BUSINESS CONTINUITY PLANNING POLICY

2.1 Business Continuity Policy Statement

Aston University is committed to the development and implementation of business continuity, appropriate to the scale, nature, complexity and geography of the University, and the relevant environments in which we operate.

Aston University believes the way in which we plan, prepare and respond to incidents is key to our overall effective recovery and continuance. Business Continuity plays a critical part in the University overall control environment.

All aspects of business continuity planning at Aston are in keeping with the Business Continuity Institute's (BCI) Good Practice Guide and are aligned to BS EN ISO 22301:2014.

2.2 The Key Aims of the Policy

The key aims of the policy are:

- The protection of people, assets, earning capacity, information, reputation, brand and value of the university and its key stakeholders.
- Compliance with regulatory and governance obligations following an unforeseen incident.
- Ensuring that plans are fit for purpose through regular training, updating and testing to agreed standards.

2.3 The Key Principles of the Policy

The key principles to which Aston University commits, are:

- Complying with legislation and regulatory requirements and delivering appropriate governance and reporting processes.
- Following the Business Continuity Institute (BCI) 'Good Practice Guidelines' and alignment to BS EN ISO 22301:2014 in developing and maintaining Business Continuity strategies and plans.
- Providing adequate resources to achieve delivery of the Business Continuity Management programme.
- Providing appropriate education and training in Business Continuity Management to all staff to increase their awareness and to enable them to understand their roles and responsibilities.
- Embedding Business Continuity Management as an integral part of the university's operations and good management practice.
- Reviewing Business Continuity 'best practice' and updating the university's Business Continuity Management strategy and standards accordingly.
- Developing procedures to assess the effectiveness of Business Continuity pans and carry out testing annually, based upon pertinent scenarios.

3. BUSINESS CONTINUITY STRATEGY

The intent of business continuity at Aston University is to minimise disruption to the provision of higher education and research to our students.

3.1 Business Continuity Objectives

Aston University business continuity objectives are to ensure that in respect of incidents:

- Risks to people and the business are properly identified, evaluated, recorded and managed.
- Measures to avoid or reduce the risk are implemented at an acceptable cost.
- Risks, and the measures implemented to control them, are reviewed regularly to ensure their continued viability and relevance.
- All legal, regulatory and duty of care requirements are met.
- Develop a robust Business Continuity capability through 'fit for purpose' plans and appropriate education and training for all staff to increase their awareness and skills.

These objectives are to be met through the implementation of procedures in line with the Standards as described in the following sections.

3.2 Business Recovery Intent and Priorities

Following a disruption or incident, the following business continuity intent and priorities will apply:

'The intent during a disruption is the continued provision of higher education to our students in a safe operating environment.'

People:	Safety and well-being of:			
	Staff, contractors and visitors			
	Students			
	Next of Kin			
Education:	Minimising disruption to:			
	Education and research			
	Assessments			
	Recruitment			
	Student experience			
Assets:	Protecting:			
	Data			
	IT Infrastructure			
	Physical Infrastructure			
Reputation:	Protecting Aston University's reputation through:			
	Communication with internal stakeholders			
	Communication with external stakeholders			

To achieve this intent, Aston University maintains the following priorities:

4. STRUCTURE, ROLES & RESPONSIBILITIES

4.1 Structure

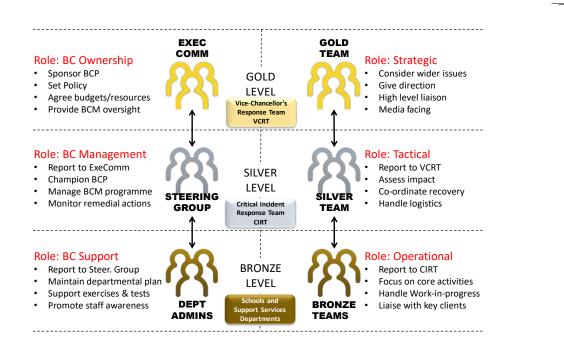
The overall ownership and accountability for Business Continuity Management rests with the Vice-Chancellor's Response Team.

Business Continuity roles at Aston University are separated into **Planning** (i.e. pre-incident) roles and **Invocation** (i.e. post incident) roles. The organisational structure for Business Continuity operates at the Strategic, Tactical and Operational levels.

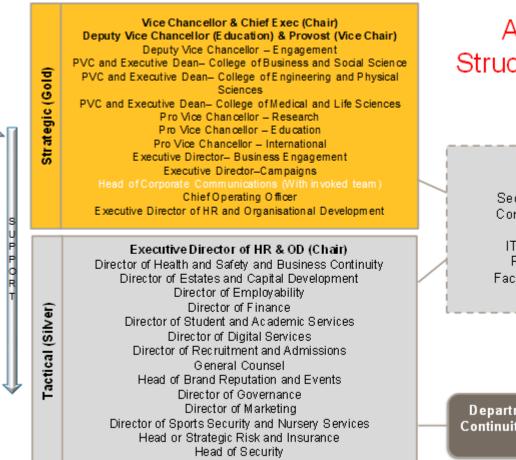
Planning teams in essence take up key response roles following a major incident, as shown below:

Planning Organisation (Pre-Incident)

Invocation Organisation (Post-Incident)



ESCALAT-OZ



Aston Crisis Structure - Detailed

<u>'Core Plans'</u>

Security Incident plan Communications Plan HR Plan IT Recovery Plans Regulatory plans Facilities/estates plans

Department / Faculty Business Continuity plans and/or Recovery Teams

4.3 Key roles and responsibilities

Ser.	Role	Responsibilities during business as usual	Responsibilities during a disruption
1	Vice Chancellor's Response Team	 Actively supports the Business Continuity Management programme. Allocates adequate resources and budget to business continuity. Approves the business continuity Business Continuity Plan, Ensures the continued effectiveness of the business continuity approach. Appoints the business continuity manager. Attends annual training and exercise. 	 Forms the Strategic Team. Sets policy and direction Represents the public face of the university.
2	Executive Director of Human Resources & Organisational Development Director of Health, Safety and Business Continuity	 Accountable for ensuring that appropriate business continuity arrangements are implemented for the processes, systems and other resources upon which the university depends. Develops and maintains the business continuity programme, which describes how, by whom and with what frequency the various elements of the business continuity arrangements, are to be tested. Acts as the business continuity expert throughout the university. Supports all aspects of tenders and client assurance relating to business continuity. As required reports to the VCRT on the status and progress of business continuity. 	Assists the VCRT and the CIRT as might be required in terms of adherence to processes.
	Critical Incident Response Team (CIRT)	 Meet to review the Business Continuity Management programme, progress, issues etc. Reports annual Business Continuity Management Programme status to the VCRT. Set the schedule for coming year. Attends annual training and exercise. 	 Assess impact and plan response and recovery Provide direction to School and Support Departments Manage resources

Ser.	Role	Responsibilities during business as usual	Responsibilities during a disruption
4	School and Support Department Business Continuity Champion (See Annex A)	 On behalf of Head of School or Support Department, implements and maintains the School or support department response plan in accordance with Aston University's business continuity policy. Ensures staff in the office are aware of business continuity arrangements. Co-ordinates validation of business continuity arrangements for own School or department. 	 Member of the site response team. Oversees the administrative support for the site response team. Acts as the business continuity expert for the site response team.
5	Head of School or Support Department	 Signs off own Business Impact Analysis and Business Continuity plan. Nominates School and Department Business Continuity Champion (BCC). 	•

5. BUSINESS CONTINUITY PLANNING STANDARDS

5.1 Introduction

The Standards embody the principles of Aston University's Business Continuity Policy endorsed by the VCRT. These standards supplement any local regulatory or legislative obligations to protect essential business functions and services. The standards define best Business Continuity practice and provide the basis for more detailed local standards where these are appropriate.

5.2 Governance & Reporting

In order to assure compliance with the Business Continuity Policy and that an appropriate level of Business Continuity Management capability is developed and maintained, Business Continuity is to be reported to the VCRT on an annual basis, or more frequently when considered necessary by the CIRT.

5.3 The Business Continuity Management Programme Life Cycle

Business Continuity strategies, solutions and plans are complex and require considerable effort to maintain, communicate and exercise. The Business Continuity Management effort is best approached as a three-year rolling programme.

The Business Continuity Institute (BCI) – an internationally recognised good practice authority – recommends the following approach, a life cycle based on the Plan-Do-Check-Act model:





The Plan-Do-Check-Act model

The BCI's Business Continuity Management cycle

6. POLICY AND PROGRAMME MANAGEMENT

The Business Continuity Policy and Standards document sets out the scope and governance for the Business Continuity Management programme. It sets out the methodology by which the programme will be delivered.

The Business Continuity Management programme requires the following documents to be maintained:

Ser	Document	Frequency of update	Author
1.	Business Continuity Policy and Standards.	Annual.	Director of Health, Safety and Business Continuity
2.	Business Continuity Programme Schedule.	On-going.	Director of Health, Safety and Business Continuity

7. ANALYSIS

7.1 Business Impact Analysis (BIA)

A review of the BIA will be conducted at least every two years and is part of the strategic review process. It may not be necessary to conduct a full BIA survey but the review will at least confirm or provide an opportunity to amend the findings of the most recent BIA.

Amongst other things, the BIA will determine:

- Critical activities.
- Recovery Time Objectives (RTO) for all activities.
- Recovery resource requirements (workspaces, systems, services etc.) required to maintain Critical activities.

Through an understanding of organisational changes and technology developments within the university, and an understanding of the criticality of activities achieved through the BIA the CIRT will be able to determine whether or not the current recovery strategies meet the university's needs.

7.2 Risk Assessment

Aston University will maintain a university wide Business Continuity Risk Register which will integrate into the University's group wide Risk Register.

Within Business Continuity, a Risk Assessment will identify risks to the University, its people, assets, operations and reputation that will inform the Business Continuity Management plans and programme.

A review of the key risks will be conducted annually and is part of the strategic review process.

7.3 Impact Levels

In order to set a common level of impact metrics across the process, Aston University will use the following impact levels for all analysis.

Impost Type	Sub	Level of Impact				
Impact Type	Impact Type	– Impact Score				
		Dealt with by School/schools or prof services unit.	Dealt with by School/schools or prof services unit but CIRT informed	CIRT with VCRT informed	VCRT and CIRT active	VCRT and CIRT active
		1	2	3	4	5
		Insignificant	Minor	Moderate Tolerance - RTO	Major MAO	Extreme
People	Safety	Minor Injury (local first aid) - no psychological effects	Injury (out patient) - no long term psychological effects	Temporary Disability (in patient) <20 people require counselling	Death or life changing injury 20-100 people require counselling	Multiple Fatalities 100 people require counselling
	Staff availabilit y	Potential staff absenteeism of less than 10% in a School / department.	Potential staff absenteeism of up to 25% in a School / department.	absenteeism of up to 50% in a	Potential staff absenteeism of up to 75% in a School / department.	Potential staff absenteeism over 75% in a School / department.
	Wellbein g	Insignificant inconvenience staff/student.	Minor staff/student dissatisfaction that requires some local recompense.	dissatisfaction that requires	Major staff/student dissatisfaction that involves claim through legal representative	that is being taken to law courts for
Assets	Financial (Loss / Cost)	<£100k	£100k - £1m	£1m - £5m	£5m - £20m	>£20m
	Premises availabilit y	Alternate real estate available for activity at dep/func level	Alternate real estate available for activity in wider university	5-10% of university compromised - alternate real estate required outside of university	10-25% of university compromised - alternate real estate required outside of university	25-50% of university compromised - alternate real estate required outside of university
	IT Services	Minor local outage	Prolonged localized outage more than 24 hours	Loss of several systems Less than 24 hours	Loss of several systems more than 24 hours	Loss of all systems eg active directory failure
Reputation	N/A	Reference in press but no reputational damage	Reputational criticism requiring a considered response	Reputational damage requiring proportionate response	Reputational loss requiring strategic intervention	Irredeemable loss of reputation with effect on strategic intent

Compliance	N/A	No Impact / sanction	Adverse assessment of service	Adverse assessment at business level; remedial action urgent	Adverse assessment published and sanctions imposed	Regulator exercises powers with impact on university strategy with organisational re-adjustment
Services, Teaching, Research and Innovation	N/A		Disruption to services / faculties	Failure to deliver key services	Prolonged failure of several services	Sustained failure to deliver all services

The Business Continuity Management programme requires the following documents to be maintained:

Ser.	Document	Frequency of update	Author
1.	Business impact analysis and risk assessment methodology.	Annual.	Director of Health, Safety and Business Continuity
2.	School and Support Department Business impact analyses.	Annual.	Relevant School and Support Department Business Continuity Coordinators.
3.	University business continuity risk assessment.	Annual.	Director of Health, Safety and Business Continuity

8. **DESIGN**

The design phase identifies and selects appropriate strategies and tactics to determine how recovery from disruption and continuity will be achieved. The design phase of Business Continuity enables Aston University to determine and document appropriate Business Continuity strategies. This incorporates:

- A response structure that allows the University to respond to any given disruption in an appropriate and proportionate manner.
- Recovery options that enable us to meet the recovery times identified for each critical activity.
- Mitigation measures that will reduce the likelihood and or reduce the impact of the identified threats.

9. IMPLEMENTATION

Aston's crisis management and recovery Plans enable the university to execute agreed strategies and tactics. The plans identify and document the priorities, procedures, responsibilities and resources to assist each response team to manage a disruption, while implementing continuity and recovery strategies to a pre-determined level.

The Business Continuity Management programme requires the following plans to be maintained:

Ser	Document	Frequency of update	Author
1.	VCRT Crisis Management and Recovery Plan.	Annual.	Director of Health, Safety and Business Continuity.
2.	CIRT Crisis Management and Recovery Plan.	Annual.	Director of Health, Safety and Business Continuity.
3.	School and Support Department Recovery Plans.	Annual.	Relevant School and Support Department Business Continuity Coordinators.
4.	Individual business continuity aide memoires	Annual.	Director of Health, Safety and Business Continuity.

10. VALIDATE

Validation is the phase that confirms that Business Continuity is meeting the identified objectives and that the university's arrangements are fit for purpose. The purpose of validation is to ensure that the Business Continuity capability reflects the nature, scale and complexity of Aston University to ensure it is current, accurate, and complete, with actions taken to continually improve business continuity.

10.1 Training and Exercising

Testing is an on-going process. Exercising and testing the business continuity capability and competence falls into three categories:

- Emergency Response: emergency evacuation drills should be undertaken twice yearly.
- Cascade Call: testing the key contacts callout should take place every year.
- Scenario: there should be a scenario based workshop exercise of the VCRT and CIRT every year.
- Recovery Testing: tests of the recovery strategies should be carried out annually. Such tests will encompass technology and/or user exercises.

10.2 Management Review

The CIRT will meet at the end of each programme year to answer and report to the VCRT on the question:

Is our Business Continuity strategy still fit for purpose?

The agenda will address the question: Is our Business Continuity strategy appropriate?

• Does it take into account organisational changes that have occurred in the past year?

- Have there been any major technology upgrades, additions that are no longer covered by the current solution(s)?
- Do the recovery strategies meet regulatory and the university's requirements?

The review should take into account the results and recommendations from tests and exercises conducted over the past year alongside the findings of the most recent Risk Assessment (RA) and Business Impact Analysis (BIA).

Programme Management

At the beginning of each year, targets and objectives for the year will be set and agreed by the VCRT. These will then be reviewed at year-end to measure achievements, reschedule and/or redirect planning efforts etc. for the coming year.

10.3 Post disruption reviews

If there is a formalised response to a disruption at the university, i.e. the CIRT has been invoked, then a post-disruption review will be undertaken to ensure all lessons are captured. Lessons identified thus become lessons learnt.

The Director of Health, Safety and Business Continuity (or School/Support Department Business Continuity Coordinator if affected) is responsible for documenting post disruption reviews.

The Business Continuity Management programme requires the following documents to be maintained:

Ser	Activity or Document	Frequency of update
	Management review by VCRT.	Annual.
	Management review by CIRT.	As a minimum - Annual.
	Business continuity exercises for the VCRT and the CIRT.	Annual.
	Evidence of staff awareness training.	As required.
	Post exercise reports.	As required.
	Post disruption reviews.	On going.

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