Business Continuity and Incident Management Policy

1 Introduction

1.1 The International Standard ISO22301 defines Business Continuity as 'The capability of an organisation to continue delivery of products or services at acceptable predefined levels following a disruption'.

1.2 The University of London is committed to protecting the safety and welfare of all interested parties, to the continued delivery of key operations and return to business as usual as quickly as possible, following a disruptive incident.

1.3 The University will implement and maintain an effective Business Continuity and Incident Management (BCIM) programme to support the strategic objectives of the organisation and proactively build the capability to continue business operations in the event of disruption. This includes the identification of risks and threats; the creation of response structures and plans to address incidents and crises. The BCIM programme is flexible to changes in the internal and external operating environment and delivers measurable value to the University.

1.4 International Standard ISO 22301 (Business Continuity Management) and the Business Continuity Institute (BCI) Good Practice Guidelines will inform the development of the University's Business Continuity arrangements.

2 Purpose

2.1 To provide a framework for incident management and business continuity activities at the University of London, to facilitate appropriate decision-making that protects life, limits damage and minimises business disruption for the benefit of the University and its interested parties.

2.2 To identify priority activities that underpin the University's strategic objectives and operations.

2.3 To enable the University to deal with the impact of disruptive events and in the aftermath of an incident to recover its Prioritised Activities and return to business as usual as quickly as possible.

3 Scope

3.1 The Business Continuity and Incident Management (BCIM) programme will operate across the University, including CoSector and the University of London Institute in Paris, focussing on the Prioritised Activities which protect the safety and welfare of its interested parties, maintain legal/regulatory obligations and/or support the University's strategic objectives.

3.2 The University considers interested parties to include: students, staff, visitors, tenants, contractors, neighbours, the emergency services, the London Borough of Camden, OfS and research funders.

3.3 This policy is not intended to change existing business-as-usual management processes and operations. It will support existing good practice where it contributes to organisational resilience.

4 Aims and Objectives

4.1 To ensure that robust and relevant Business Continuity and Incident Management Plans are in place across the University, both at organisational and departmental level.

4.2 To identify all priority activities across the University, together with their time-frame sensitivity, identification of risks, threats and continuity requirements, using the Business Impact Analysis (BIA) methodology.

4.3 To ensure that appropriate Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs) are identified to inform the University's IT Disaster Recovery Plan.

4.4 To align the BCIM programme with existing University risk management methodologies and processes.

4.5 To establish partnerships with external agencies, University of London Member Institutions (MIs) and neighbouring organisations, utilising national, regional and local risk registers and threat alerts where applicable.

4.6 To establish defined structures to plan for and respond to incidents, including the identification of appropriate communication channels.

4.7 To provide guidance, advice and training where necessary to personnel key to the success of the programme.

4.8 To ensure plans are subject to regular review, audit and exercise, adopted across the University and that Business Continuity is embedded into the culture of the University so that it becomes an integral part of decision making.

4.9 To raise the profile of BCIM within the University to include staff awareness of plans as they relate to their working environment.

5 Roles, Responsibilities and Governance

5.1 Vice-Chancellor

As principle officer of the University of London, the Vice-Chancellor is the owner and senior stakeholder for Business Continuity.

5.2 Business Continuity Lead

The Pro Vice-Chancellor (Finance and Operations) is the lead for Business Continuity on behalf of the Vice-Chancellor. The role holder will:

- 'Champion' Business Continuity at the strategic level by endorsing and supporting the BCIM programme.
- Report on the BCIM programme to the University's Audit and Risk Assurance Committee on a termly basis.
- Chair Gold Team meetings during a critical incident (with the Pro Vice-Chancellor Partnerships and Governance to act as deputy).

5.3 Business Continuity Manager

The Associate Director IT Security and Business Continuity is responsible for managing the implementation of the BCIM Policy and Programme on a day-to-day basis. The role holder will:

- Ensure that the organisational Business Continuity and Incident Management Plan and departmental Business Continuity Plans are in place and maintained.
- Ensure structures and procedures are in place to respond to disruptive incidents and put in place appropriate training, regular exercising and reporting.
- Provide support to the Gold and Silver Incident Management Teams during an incident.
- Chair the Business Continuity Steering Group (BCSG).
- Provide a quarterly report on the BCIM programme to the Vice-Chancellor's Executive Group.

5.4 Business Continuity Coordinator

The Business Continuity Coordinator, reporting into the Business Continuity Manager, provides support to all aspects of the BCIM Programme. The post holder will:

- Maintain the organisational BCIM Plan and assist departments and institutes with maintenance of local Business Continuity Plans as required.
- Organise and take notes for Gold, Silver and Departmental BCIM exercises.
- Take minutes at Silver Team and BCSG meetings.

5.5 Departments and Institutes

The director of each department or institute is responsible for ensuring that Business Continuity Plans are in place, fit-for-purpose, regularly tested and updated. They will nominate a member of staff within their department or institute to liaise with the Business Continuity Coordinator and keep the plan up to date.

5.6 Business Continuity Steering Group (BCSG)

The remit of this organisation-wide group is to oversee the development of Business Continuity and Incident Management Planning on behalf of the Business Continuity Lead.

- The group is chaired by the Business Continuity Manager and includes representatives across the University, including from Risk Management, Estates and Facilities, Human Resources, IT and Digital Services, Communications, Residential Services, School of Advanced Study and University of London Worldwide.
- The BCSG will ensure that an effective BCIM programme is being implemented, consider annually the findings of the Business Impact Analysis process, review reports and actions around incidents, and make recommendations for improvements, efficiencies and training to ensure continued engagement with Business Continuity and Incident Management Planning for the University.

5.7 Staff

- Every member of staff must be aware of the evacuation and Health & Safety arrangements that affect their working environment. Staff members should also be aware of their departmental Business Continuity Plan and how it will affect them.
- Staff members should ensure that they are clear on how they should report incidents and how they will be contacted or notified in an emergency.

6 Incident Response Structure

6.1 The University has adopted a three-tier command structure for incidents that require a coordinated response outside of normal business-as-usual processes. The lead team will be determined by the severity of the incident.

Bronze (Operational) *or Departmental BCP Teams*	Silver (Tactical) *Duty Director, heads of professional services plus other heads as necessary*	Gold (Strategic) *Senior Executive Team*
Minor Incidents	Serious Incidents	Critical Incidents
Operational support during a critical incident and responsible for implementing processes for business recovery	Agreeing operational priorities for dealing with the incident and business recovery	High level strategic direction for the management of significant financial or reputation risk

6.2 The University operates a Duty Director rota to provide 24x7 escalation to Silver Team.

6.3 The University's Business Continuity and Incident Management Plan sets out guidance and escalation thresholds for incident response.

7 Monitoring and exercising

7.1 The Business Continuity Steering Group is responsible for regular monitoring of the BCIM programme efficacy.

7.2 This policy will be reviewed at least annually.

7.3 Plans should be exercised at least annually, and any learning points should be recorded and implemented as appropriate. Exercises should be proportionate to need and linked to organisational or external threats and risks. The management of live incidents counts as an exercise.

7.4 Business impact analysis, risk identification and business continuity plans must be reviewed and revised after an invocation of the plan, following an exercise or at least annually. They should also be subject to review and revision if there is a major service development or change to activity.

7.5 The Finance and Planning department leads on risk management for the University. The BCSG will work closely with the risk function to ensure that Business Continuity risk is managed as part of the broader needs and ambitions for the University.

8 Relevant Legislation and Related Policies

8.1 The University will abide by all the UK legislation related to Incident Response Planning. This includes, but is not limited to, the following acts:
- Health & Safety at Work Act 1974
- Human Rights Act 1998
- Corporate Manslaughter and Corporate Homicide Act 2007

8.2 The following University of London policies are related to this policy:
- Health and Safety Policy
- Risk Management Policy
- Corporate Social Responsibility
- Information Security Policy
- Visitor Regulations
- Procurement Policy

9 Policy sign-off and Communication

9.1 This Policy is approved by VCEG. This Policy will be communicated directly to all personnel involved in the delivery of the BCIM programme and made available to all interested parties on the University of London website.

10 Version Control

Date	Version	Purpose/Change	Author
15/02/2023	1.0	First draft approved by RA	Associate Director IT Security & Business Continuity
21/06/2023	1.1	Updated following audit by PwC	Associate Director IT Security & Business Continuity
08/09/2023	1.2	Updated and approved by VCEG	Associate Director IT Security & Business Continuity