

IADT Business Continuity Policy

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Contents

Document reference and version Number	2
Who needs to know about this document	2
1. INTRODUCTION AND CONTEXT	4
2. DEFINITIONS + TERMINOLOGY	5
3. BUSINESS CONTINUITY PLANNING POLICY	6
3.1 Business Continuity Policy Statement.....	6
3.2 The Key Aims of the Policy	6
3.3 The Key Principles of the Policy	6
4. BUSINESS CONTINUITY STRATEGY	7
4.1 Business Continuity Objectives	7
4.2 Business Recovery Intent and Priorities	7
5. STRUCTURE, ROLES & RESPONSIBILITIES	8
5.1 Structure	8
5.2 Team Membership.....	9
5.3 Key roles and responsibilities.....	10
6. BUSINESS CONTINUITY PLANNING STANDARDS.....	12
6.1 Introduction.....	12
6.2 Governance & Reporting.....	12
6.3 The Business Continuity Management Programme Life Cycle	12
7. POLICY AND PROGRAMME MANAGEMENT	13
8. ANALYSIS	13
8.1 Business Impact Analysis (BIA)	13
8.2 Risk Assessment.....	13
8.3 Impact Levels	14
9. DESIGN	16
10. IMPLEMENTATION	16
11. VALIDATE	17
11.1 Training and Exercising	17
11.2 Management Review	17
11.3 Post disruption reviews.....	18

This policy will be updated in line with significant organisational development and arising from the invoking of this Plan.

1. INTRODUCTION AND CONTEXT

The loss, or disruption of IADT critical activities requires an effective Business Continuity Plan. Good business practice, health and safety duty of care, staff and student expectations and increasing regulatory requirements dictate that there are proactive plans and procedures to enable the Institute to respond to and manage major incidents or business interruption.

This document outlines and describes the key elements of Business Continuity at IADT. It is divided into the following sections:

- **Business Continuity Planning Policy**
Demonstrates the Institute'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 Institute's academic reputation and operations. Responsibilities for both pre and post incident events are described here.
- **Business Continuity Planning Standards**
Business Continuity Planning Standards by which the Institute will implement the Business Continuity Planning Policy.

The Institute's will have in place a strategy, implemented solutions and documented business continuity plans for the Institute as a whole and for each operational area of the Institute. Achieving these objectives forms part of an on-going commitment to ensure our strategy, solutions, documentation and staff awareness, remains current and effective.

The Business Continuity Policy & Standards document is designed for use by all Directorates, Faculties and Departments in their local Business Continuity Planning. 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 IADT's Business Continuity Policy endorsed by the Executive Management Team. The Standards represent the minimum requirements for the Institute's Business Continuity Management System (BCMS).

2. DEFINITIONS + TERMINOLOGY

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

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 or functional operations and activities.
Business Continuity Planning	BCP	The ability to continue key Institute operations in the event of any incident that interrupts normal business at the Institute.
Business Continuity Plan	BCP	The Institute’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 Lead	BCL	The person tasked with day-to-day responsibility for ensuring that the Institute adheres to the Business Continuity Management regime.
Business Continuity Champion	BCC	The person in each Directorate, Faculty and Department responsible for owning and ensuring the Directorate, Faculty and Department plans are up to date and operational.
Risk Assessment	RA	The process by which the Institute assesses its key risks for which it requires a Business Continuity Plan.
Business Impact Analysis	BIA	The process by which the Institute decides upon recovery priorities, timescales and minimum recovery resources
Office of the President’s Response Team	OPRT	The Institute’s strategic level business continuity planning and response team — Chaired by the President.
Critical Incident Response Team	CIRT	The Institute’s tactical level business continuity planning and response team — Chaired by the BCL

3. BUSINESS CONTINUITY PLANNING POLICY

3.1 Business Continuity Policy Statement

IADT is committed to the development and implementation of business continuity, appropriate to the scale, nature, complexity and geography of the Institute, and the relevant environments in which it operates.

IADT 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 Institute's overall control environment.

IADT's Business Continuity Policy has been developed in accordance with the [Business Continuity Institute's](#) (BCI) Good Practice Guidelines and are aligned to [ISO 22301:2019](#) as amended.

3.2 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 Institute 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.

3.3 The Key Principles of the Policy

The key principles to which IADT 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 ISO 22301:2019, as amended, 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 Institute's operations and good management practice.
- Reviewing Business Continuity 'best practice' and updating the Institute's Business Continuity Management strategy and standards accordingly.
- Developing procedures to assess the effectiveness of Business Continuity plans and carry out testing annually, based upon pertinent scenarios.

4. BUSINESS CONTINUITY STRATEGY

The intent of business continuity at IADT is to minimise disruption to the provision of higher education and research to our students as well as functionality for our staff and operations.

4.1 Business Continuity Objectives

IADT's business continuity objectives are to ensure that in respect of incidents:

- Risks to people and the business are properly identified, evaluated, recorded and managed and more importantly minimised.
- 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.

4.2 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 and the continued provision of safe places of work for our staff.'

To achieve this intent, IADT maintains the following priorities:

People:	Safety and well-being of: <ul style="list-style-type: none"> • Staff, contractors and visitors • Students • Family and friends of any of the above
Education:	Minimising disruption to: <ul style="list-style-type: none"> • Education and research • Assessments • Student Recruitment • Student experience
Assets:	Protecting: <ul style="list-style-type: none"> • Data • IT Infrastructure • Physical Infrastructure
Operations:	Maintaining: <ul style="list-style-type: none"> • Key functional operations (not directly affected by the incident) • Operation of the Institute Restoring <ul style="list-style-type: none"> • All functions and departments impacted by the Incident to full and safe operation
Reputation:	Protecting IADT's reputation through: <ul style="list-style-type: none"> • Communication with internal stakeholders • Communication with external stakeholders

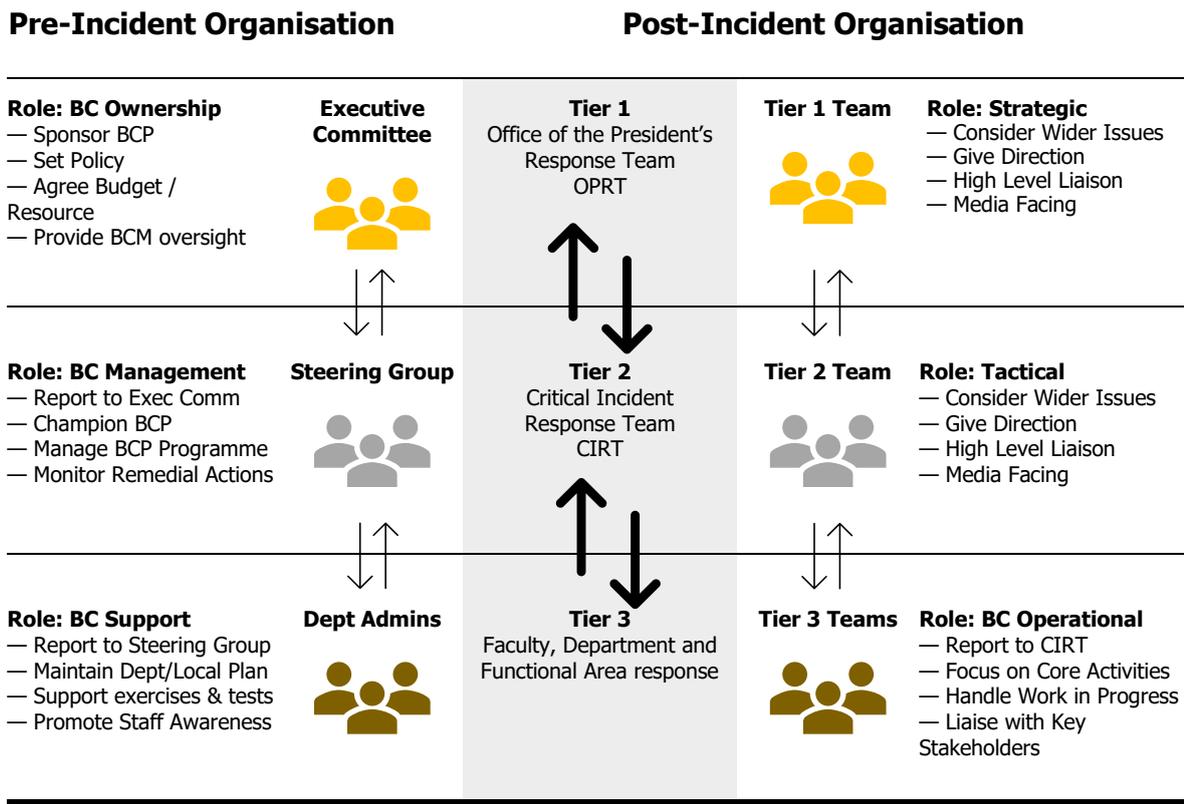
5. STRUCTURE, ROLES & RESPONSIBILITIES

5.1 Structure

The overall ownership and accountability for Business Continuity Management rests with the Office of the President's Response Team.

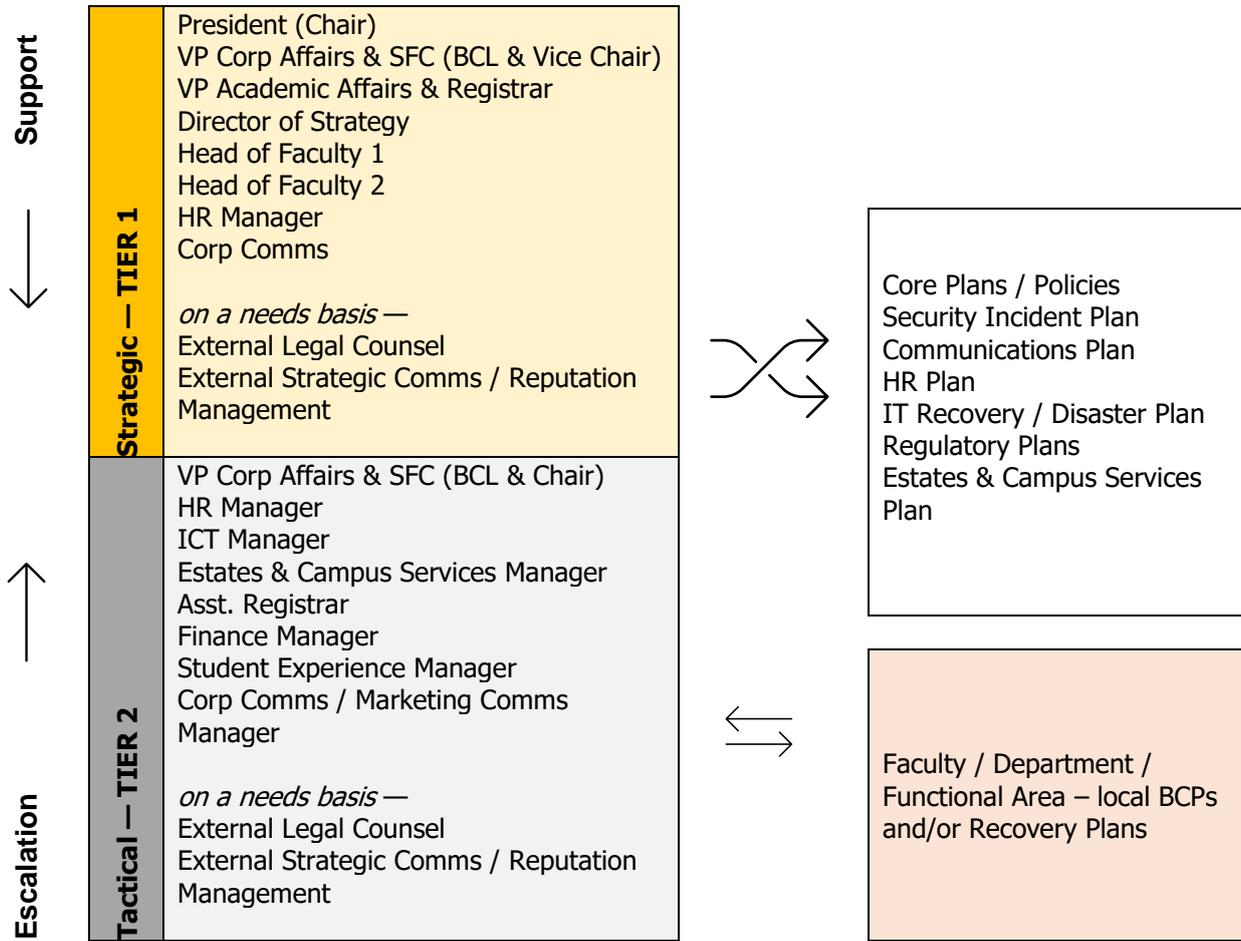
Business Continuity roles in IADT are separated into **Pre-Incident** and **Post-Incident** roles and actions. The organisational structure for Business Continuity operates at the Strategic, Tactical and Operational levels.

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



5.2 Team Membership

IADT Business Continuity / Crisis Response Structure Detailed



5.3 Key roles and responsibilities

Ser.	Role	Responsibilities during business as usual	Responsibilities during a disruption
1	President	<ul style="list-style-type: none"> ● 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 Institute’s Business Continuity Lead. ● Attends annual training and exercise. 	<ul style="list-style-type: none"> ● Assembles the Strategic Response Team. ● Sets policy and direction ● Represents the public face of the Institute.
2	Institute Business Continuity Lead	<ul style="list-style-type: none"> ● Accountable for ensuring that appropriate business continuity arrangements are implemented for the processes, systems and other resources upon which the Institute 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 Institute. ● Supports all aspects of tenders and client assurance relating to business continuity. ● As required reports to the OPRT on the status and progress of business continuity. 	Assists the OPRT and the CIRT as might be required in terms of adherence to processes.

Ser.	Role	Responsibilities during business as usual	Responsibilities during a disruption
3	Critical Incident Response Team (CIRT)	<ul style="list-style-type: none"> ● Meet to review the Business Continuity Management programme, progress, issues etc. ● Reports annual Business Continuity Management Programme status to the OPRT. ● Set the schedule for coming year. ● Attends annual training and exercise. 	<ul style="list-style-type: none"> ● Assess impact and plan response and recovery ● Provide direction to Directorates, Faculties and Departments ● Manage resources
4	Directorates, Faculties and Departments Business Continuity Champion (See Annex A)	<ul style="list-style-type: none"> ● On behalf of Head of Directorate, Faculty and/or Department, implements and maintains the Directorate, Faculty and Departmental response plan in accordance with IADT's business continuity policy. ● Ensures staff in the Directorate, Faculty and/or Department are aware of business continuity arrangements. ● Co-ordinates validation of business continuity arrangements for own ● Directorate, Faculty and/or Department. 	<ul style="list-style-type: none"> ● Member of the site response team. ● Oversees the administrative support for the site response team. <p>Acts as the business continuity expert for the site response team.</p>
5	Head of Directorate, Faculty and/or Department	<ul style="list-style-type: none"> ● Signs off own Business Impact Analysis and Business Continuity plan. ● Nominates Directorate, Faculty and/or Department Business Continuity Champion (BCC). 	Member, where appropriate of Institute Business Continuity Response Team

6. BUSINESS CONTINUITY PLANNING STANDARDS

6.1 Introduction

The Standards embody the principles of IADT's Business Continuity Policy endorsed by the OPRT. 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.

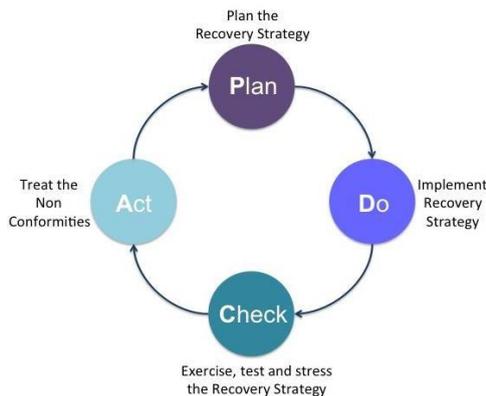
6.2 Governance & Reporting

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 OPRT on an annual basis, or more frequently when considered necessary by the CIRT.

6.3 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

7. 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	VP Corp Affairs & SFC – the appointed Institute Business Continuity Lead (BCL)
2.	Business Continuity Programme Schedule	On-going	Institute Business Continuity Lead
3.	Business Continuity Training Register	On-going	Institute Business Continuity Lead & HRM

8. ANALYSIS

8.1 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 Institute, 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 Institute's needs.

8.2 Risk Assessment

IADT will maintain an Institute wide Business Continuity Risk Register which will integrate into the Institute's Risk Register.

Within Business Continuity, a Risk Assessment will identify risks to the Institute, 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.

8.3 Impact Levels

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

Impact Type	Sub-Impact Type	Level of Impact – Impact Score				
		Dealt with by Directorate, Faculty and/or Department.	Dealt with by Directorate, Faculty and/or Department but CIRT informed	CIRT with OPRT informed	OPRT and CIRT active	OPRT 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 availability	Potential staff absenteeism of less than 10% in a Directorate, Faculty and/or Department.	Potential staff absenteeism of up to 25% in a Directorate, Faculty and/or Department.	Potential staff absenteeism of up to 50% in a Directorate, Faculty and/or Department.	Potential staff absenteeism of up to 75% in a Directorate, Faculty and/or Department.	Potential staff absenteeism over 75% in a Directorate, Faculty and/or Department.
		Key Staff Member unavailability/unplanned absence < 2 weeks	Key Staff Member unplanned absence > 2 weeks	Key Staff Member unavailability/unplanned absence > 3 weeks	Key Manager, Head of Directorate, Faculty and/or Department unplanned absence > 2 weeks	Key Manager, Head of Directorate, Faculty and/or Department unplanned absence > 3 weeks
	Wellbeing	Insignificant inconvenience staff/student.	Minor staff/student dissatisfaction that requires some local redress.	Staff/student dissatisfaction that requires some formal apology and recompense.	Major staff/student dissatisfaction that involves claim through Union/legal representative.	Major staff/student dissatisfaction that is being taken to law courts for significant claim.
Assets	Financial (Loss / Cost)	<€10k	€10k - €20k	€20k - €50k	€50k - €100k	>€100k

	Premises availability	Alternate real estate available for activity at Directorate, Faculty and/or Department level	Alternate real estate available for activity in wider Institute	5-10% of Institute compromised - alternate real estate required outside of Institute	10-25% of Institute compromised - alternate real estate required outside of Institute	> 25% of Institute compromised - alternate real estate required outside of Institute
	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
		General Phishing/Hacking attempt	Multiple Phishing/Hacking Attempts	Simultaneous Multiple Phishing/Hacking Attempts	Cyber Attack	Cyber Attack on all Systems
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	Minor infraction identified locally or during audit; 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 Institute strategy with organisational re-adjustment
Services, Teaching, Research & Innovation	N/A	Minor Disruption	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.	Institute Business Continuity Lead
2.	Directorate, Faculty and/or Department Business impact analyses.	Annual.	Relevant Directorate, Faculty and/or Department Business Continuity Coordinators.
3.	Institute business continuity risk assessment.	Annual.	Institute Business Continuity Lead

9. 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 IADT to determine and document appropriate Business Continuity strategies.

This incorporates:

- A response structure that allows the Institute 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.

10. IMPLEMENTATION

IADT's crisis management and recovery Plans enable the Institute 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.	OPRT Crisis Management and Recovery Plan.	Annual.	Institute Business Continuity Lead
2.	CIRT Crisis Management and Recovery Plan.	Annual.	Institute Business Continuity Lead

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.

11. VALIDATE

Validation is the phase that confirms that Business Continuity is meeting the identified objectives and that the Institute'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 IADT to ensure it is current, accurate, and complete, with actions taken to continually improve business continuity.

11.1 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.

11.2 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 Institute'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.

11.3 Post disruption reviews

If there is a formalised response to a disruption at the Institute, 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 Institute Business Continuity Lead (or Directorate/Faculty/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
1.	Management review by OPRT.	Annual.
2.	Management review by CIRT.	As a minimum - Annual.
3.	Business continuity exercises for the OPRT and the CIRT.	Annual.
4.	Evidence of staff awareness training.	As required.
5.	Post exercise reports.	As required.
6.	Post disruption reviews.	On going.