

## Audit & Risk Committee – for assurance

**Meeting agenda title:** Business Continuity Management Policy Statement

**Meeting date:** 17 January 2023

**Time required:** 10 minutes

**Presenter:** Joanne Butler

**Approved by:** Louise Byers

### 1. Objective and recommendation

- 1.1. The purpose of this report is to give the Committee assurance on the development of the ICO's business continuity practices, in the context of the Business Continuity Management Policy. The Committee is recommended to comment on and note the report and changes to the Statement.

### 2. Developing a common understanding

- 2.1. The purpose of the Business Continuity Management Policy Statement is to set out the ICO's overall approach to business continuity. This policy statement is supported by the Business Continuity Plan, which sets out how the ICO will respond to business continuity incidents.

### 3. Matters to consider to achieve objective

- 3.1. We have reviewed the policy and it remains fit for purpose. Therefore, only minor changes have been made to the policy to bring it in line with ICO25. The updated policy is at Annex 1. The minor changes in the policy bely the amount of focus that has been put on this area, particularly over the last twelve months, with the Risk and Governance Team reviewing the Business Continuity Plan.
- 3.2. The Corporate Business Continuity Plan has been revised with further information being added around the incident declaration process and the communications response to ensure that there is clarity about this crucial part of the business continuity response.
- 3.3. The recently updated Corporate Business Continuity Plan has been circulated to team members and Directors, with a staff version being uploaded to Iris and highlighted in the Weekly Word, including a quote from Louise Byers stating the importance of

having a business continuity plan. We will ensure that any guidance, training and exercises for staff will be relevant to the roles and responsibilities so that we continue to build the maturity of business continuity and resilience of the organisation.

- 3.4. With colleagues from Internal and External Comms, Cyber Security, Digital and IT, and Facilities we carried out a desktop exercise relating to loss of accommodation and the lessons learned from this exercise help to inform the development of an Incident Response Plan and identifying Bronze Team Members for these areas of the business.
- 3.5. Looking forward, we will run exercises to test departmental business continuity plans currently in place and provide support in updating these plans where necessary. This will ensure that a consistent approach to our business continuity plans is being taken across the organisation.
- 3.6. A Risk and Business Continuity Manager was recruited in early 2022. Their role has been to continue the development of our business continuity maturity, particularly including organising and running the desktop testing exercises and considering the use of Business Continuity Champions to raise the profile of business continuity.

## 4. Areas for challenge

- 4.1. Are the objective the policy set out still the right business continuity objectives for the organisation? Does the policy continue to set the right level of ambition?
- 4.2. Is the level of progress with the business continuity plan appropriate?

## 5. Communications considerations

- 5.1. There are no communications considerations for this report at this time.

## 6. Next steps

- 6.1. The next steps for this work are:
  - Deliver desktop exercises for the departmental business continuity plans and update where necessary.
  - Review departmental Business Impact Assessments

- Consider how we cascade the information to best effect and appropriate for the level of users
- Quarterly reports to Risk & Governance Board providing update on business continuity actions.

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**Consultees:** Joanne Butler, Risk and Governance Board

**List of Annexes:** Annex 1 – Business Continuity Management Policy Statement, v1.2 (draft)

**Publication decision:** This report can be published externally and internally without redaction.

**Outcome reached:**