

Business Continuity Management Policy Statement

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Key messages

The main objective of this policy is to provide:

- The meaning and importance of business continuity to the ICO
- The intention and direction of the business continuity programme
- Enhance the capability and resilience of the organisation
- Help to ensure continuity of service is as practicable following an unexpected disruption to normal services.

Does this policy relate to me?

The scope of business continuity programme includes all services provided by the ICO and includes all ICO office locations. The ICO will undertake a staged approach to business continuity, focusing on business-critical areas, corporate risks and priority activities in earlier stages of the business continuity programme to help mitigate and manage areas of higher risk.

All members of staff should familiarise themselves with the Policy and Plan, both at corporate and local levels

Table of contents

1. Foreword.....	2
2. Introduction	3
3. Business Continuity Policy Scope.....	3
4. Business Continuity Policy Aims	4
5. Goal#1: Business Continuity Governance	4
6. Goal#2: Business Continuity Culture	5
7. Goal#3: Business Continuity Skills	6
8. Goal#4: Business Continuity Approach.....	7
9. Communication and Maintenance	7
10. Related Policies and Procedures.....	8
Feedback on this document.....	9
Version history	9

1. Foreword

Welcome to the Business Continuity Policy of the Information Commissioner's Office (ICO). At the ICO we provide a range of services to the public, to businesses and organisations and of course to our own people as employees.

It is essential that we have plans and approaches in place to avoid unacceptable interruption or disruption to these services. These 'business continuity' plans are therefore an important part of the work of us all at the ICO. Having a business continuity plan to follow in the event of an incident provides assurance to our stakeholders, customers, and employees that we can respond effectively to any operational emergency that may affect our business areas.

We are committed to ensuring that we can deliver continuity and restore our key services as efficiently as possible in the event of a disruption, such as fire, flood, staff absence, or IT infrastructure failure.

This Policy outlines how we will manage our business continuity framework to ensure that we will be ready for the unexpected and able to deliver an effective service as a regulator.

Paul Arnold MBE,
Deputy Chief Executive and Chief Operating Officer.

2. Introduction

- 2.1 This business continuity policy statement forms part of the Information Commissioner's Office's (ICO's) internal control and corporate governance arrangements and provides the intention and direction of the business continuity programme. The Information Commissioner recognises that as a regulator, the Office has a duty to the public, its employees, partners and stakeholders to protect and preserve its ability to operate as a regulator, uphold information rights in the public interest, and to achieve its ICO25 objectives and shifts of approach.
- 2.2 Effective business continuity management enhances the capability and resilience of the organisation and helps to ensure continuity of service as is practicable following an unexpected disruption to normal services. In order to achieve this, the ICO recognises the importance of having effective business continuity management arrangements in place to ensure the effective identification, evaluation and management of its business critical services.
- 2.3 The ICO is committed to providing a business continuity programme that seeks to protect the welfare of staff, visitors and contractors and where possible to continue the delivery of services and provide regulatory certainty at acceptable predefined levels, following a disruptive incident.
- 2.4 This policy has the full support of the Information Commissioner and senior management team. The policy and the adoption of the business continuity framework, including allocating proportionate resources to business continuity arrangements, is owned by the Executive Director – Strategy & Resources.

[Back to Top](#)

3. Business Continuity Policy Scope

- 3.1 **In scope:** The scope of the business continuity programme includes all services provided by the ICO and includes all ICO office locations. Where an external provider is involved in the delivery of a critical service, this supplier and their supply chain will also be included. This includes the ICO's supporting information and communication technology and resources. The ICO will undertake a staged approach to business continuity, focusing on business-critical areas, corporate risks and priority activities in earlier stages of the business continuity programme to help mitigate and manage areas of higher risk.
- 3.2. **Out of scope:** Work will be undertaken within service areas to determine any business areas or activities that will not be included in the scope of the business continuity. This will be by exception. For example, these may be services we provide or products that we use that are nearing the end of life, or due to be decommissioned, or are areas of low volume activity that if they were included in the scope, it would not make best use of the business continuity resources available.

[Back to Top](#)

4. Business Continuity Policy Aims

- 4.1 The purpose of this policy is to clearly outline the ICO's commitment to business continuity management, describe the business continuity management goals and objectives, and provide a framework for responding across the organisation. There are 4 goals detailed below which outline the ICO's approach to business continuity management

[Back to Top](#)

5. Goal#1: Business Continuity Governance

- 5.1 Business continuity will be embedded into the business management planning and practices of the ICO so that risk and resilience is an integral part of decision making, and management.
- 5.2 Business continuity management will operate under both normal operating conditions and during business interruption events where

the ICO needs to recover critical activities within predefined time periods. The following actions will help us to achieve Goal#1:-

- **Action:** During normal operating times the Director of Risk and Governance is responsible for the facilitation of business continuity management delivery. During business interruption events a Gold, Silver and Bronze response team structure will be stood up in accordance with the Business Continuity Plan.
- **Action:** We will ensure that the Commissioner is able to rely on adequate governance and the use of the three lines model to assist with risk responsibilities and internal control. This will be done through the management of business continuity risk and ensuring resilience at a local level, and at a corporate level through the Risk and Governance team. Monitoring, assurance and challenge is provided through the Senior Leadership Team and Executive Team. Independent oversight is undertaken by the Audit and Risk Committee and through internal audit reviews.
- **Action:** We will ensure that managers take ownership and are accountable for Directorate level business continuity risks and resilience. The local response structure will be closely aligned with the existing management structure but will be flexible and capable of responding to the disruptive situation that arises.
- **Action:** We will deploy adequate resources to develop, implement, maintain and improve the ICO's resilience and business continuity management framework.

[Back to Top](#)

6. Goal#2: Business Continuity Culture

- 6.1 A strong business continuity culture is one that integrates business continuity awareness and practice into business-as-usual activities and organisational culture. Business Continuity is a specialism within the ICO's risk management procedures and aims to ensure that mitigation measures are proportionate; and that business continuity resources concentrate on areas with single points of

failure and unacceptable risk levels. The following actions will help us to achieve Goal#2:-

- **Action:** We will communicate clear and appropriate escalation procedures ensuring everyone understands the role they have to play in maintaining resilience.
- **Action:** We will empower innovation within the ICO and consider business continuity risks and impacts as we prioritise our work and implement our do it differently changes.
- **Action:** We will embed business continuity within the organisation so that it becomes part of business planning, management and business as usual.

[Back to Top](#)

7. Goal#3: Business Continuity Skills

7.1 We will ensure that staff have the skills and knowledge they need to fulfil their business continuity and resilience responsibilities. The following actions will help us to achieve Goal#3:-

- **Action:** We will ensure that all staff recognise an incident and how to report it to the relevant area, that they understand relevant business continuity plans and associated roles and responsibilities.
- **Action:** We will engender a continuous improvement mind-set towards the way we manage business continuity, align it with the Business Continuity Institute's Good Practice Guidelines, and implement lessons learned from testing and incidents.
- **Action:** We will ensure that appropriate business continuity training and learning opportunities are provided.
- **Action:** We will ensure that managers lead by example with a combination of positive attitudes, behaviours and activities to create an environment where continuity and resilience is considered in all we do.

[Back to Top](#)

8. Goal#4: Business Continuity Approach

8.1 The ICO will follow the Business Continuity Institute's Good Practice Guidelines (2023) which builds on ISO 22301:2019 requirements by defining what individuals need to know about the key stages in developing, implementing and managing a successful business continuity programme. The following actions will help us to achieve Goal#4:-

- **Action:** We will establish a framework for building ICO wide resilience with the capability of an effective response that safeguards the welfare of our staff, visitors and contractors and seeks to minimise disruption to the interests of our stakeholders.
- **Action:** We will maintain a business-wide risk and impact analysis program and an aligned corporate business continuity plan and localised business continuity plans.
- **Action:** We will minimise the risk of disruptive incidents to the ICO through collaboration with relevant ICO specialisms to establish the necessary controls to reduce risk within the relevant risk appetite (e.g. risk management, information security, physical security, health and safety).
- **Action:** We will establish appropriate business continuity targets and solutions for prioritised business areas, services and activities that protect the successful delivery of the ICO's corporate and regulatory strategies.
- **Action:** We will validate the business continuity plan with the use of exercises to an agreed schedule and review the plan following the resolution of any disruptive incidents. Validation will allow for strengths to be acknowledged and areas for development to be seen as opportunities for continual improvement.

[Back to Top](#)

9. Communication and Maintenance

- 9.1 Where and when appropriate the ICO will communicate to our customers, partners, suppliers, employees, and to DSIT and other government departments our commitment and information related to business continuity management. Our communication response during an incident will be guided by senior management working with the ICO's Communication Teams.
- 9.2 We will maintain close relationships with governments, local communities and other interested parties and where possible actively support and participate in community resilience and response efforts if required.
- 9.3 Once approved, the policy will be communicated to staff and held in the ICO's policy and procedures library for reference.
- 9.4 The Risk and Governance Team will continue to develop the business continuity processes and procedures required to deliver the business continuity management framework and will support and coordinate business continuity planning across departments. This will include the establishment, maintenance and improvements to a corporate business continuity plan. The team will ensure the exercise of the plan at least once annually and will provide regular reports on progress against the business continuity programme to the Executive Director of Strategy and Resources within risk management reports to Audit & Risk Committee.

[Back to Top](#)

10. Related Policies and Procedures

10.1 Related policies include but are not limited to the following:-

- Business Continuity Plan and Incident Management
- Risk Management Policy and Appetite Statement
- IT Disaster Recovery Plan
- Information Security Policy
- Security Incident Management Policy
- Health and Safety Policy
- Counter Fraud Policy?
- Counter Fraud Procedure?

[Back to Top](#)

Feedback on this document

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[Back to Top](#)

Version history

Version	Changes made	Date	Made by
2.0	Annual Review bringing in line with ICO25	31/1/23	Caroline Robinson/ Joanne Butler
2.1	Annual Review	18/1/24	Caroline Robinson/ Joanne Butler

[Back to Top](#)