Trinity College Dublin
Coláiste na Tríonóide, Baile Átha Cliath
The University of Dublin

Business Continuity Management Policy

1. Context

Trinity College Dublin, the University of Dublin, hereafter referred to as Trinity, is committed to implementing effective institutional resilience through robust business continuity management. Trinity will take all reasonable steps to ensure that in the event of a disruption, the impact on priority activity and services will be minimised, enabling the sustainability of the University operations with normal services resuming as soon as possible.

The basic principle of business continuity is to continue to deliver priority services and activities in the face of a disruption to the business which could include, but is not limited to, IT failure, severe weather, fire, or an outbreak of a notifiable infectious disease. A disruptive incident can vary in size to encompass a situation that might be a disruption, crisis, loss, or emergency, or a situation that could lead to a disruption, crisis, loss, or emergency.

The ISO standard surrounding Business Continuity Management, ISO 22301:2019, defines it as: "*The capability of an organisation to continue the delivery of products and services within acceptable time frames at predefined capacity during a disruption*".

2. Purpose

The purpose of this policy is to provide the formal expression of the intentions and direction of Trinity's senior leadership to implement, maintain and improve a management system that protects against, reduces the likelihood of, prepares for, responds to and recovers from disruptions when they arise and that defines, formalises and clarifies roles and responsibilities in relation to Trinity's approach and commitment to business continuity management.

The purpose of business continuity management is to ensure that the University:
- Understands its prioritised services and activities and maintains the capability to resume operations within agreed timeframes, following the deployment of a contingency planning response.
- Increases resilience by protecting critical assets and data (electronic and otherwise) through a co-ordinated approach to risk & threat mitigation and recovery.
- Minimises impacts using a focused, well-managed and rehearsed response activity.

This policy will enable the continued delivery of the prioritised services and activities that support Trinity's strategic vision of "a globally connected community of learning, research, and scholarship, inspiring generations to meet the challenges of the future".

3.   Scope

Trinity College Dublin

The policy applies to all Trinity's services and activities in Faculties, Schools, Departments, Trinity Research Institutes, Trinity Research Centres, Multidisciplinary Teaching Units, the Provost's Directorate & the Divisions and provides a foundation for the business continuity management framework for Trinity College staff, students, and other stakeholders.

Trinity College Subsidiary Companies, Associated Colleges, or Related Entities

This policy does not apply to subsidiary companies, associated colleges, and related entities.

Partnership Arrangements

In the case of external 3rd party partnership arrangements involving Trinity's prioritised services and activities, business continuity arrangements will be agreed between the partners. Whilst Trinity cannot mandate what partners must do, terms must be agreed in contracts.

Shared Premises or Resources

Where Trinity staff share premises or resources with other organisations, clear business continuity arrangements should be in place between Trinity and the other parties, recognising that certain aspects of the arrangements may be the responsibility of non-Trinity staff. In these situations, Trinity staff must agree on shared rules and procedures with the other parties involved.

Invocation of Business Continuity Plans

Trinity will invoke business continuity plans in the event of any incident, minor or major, whether expected or unexpected, that disrupts the prioritised services and activities of Trinity beyond an agreed maximum tolerable period of disruption.   When business continuity plans are invoked, it may require focused effort and diversion of resources from within the functional area or from another functional area within the College.

A major disruptive incident resulting in a complex situation, needing significant resources and time to manage, with widespread, prolonged impact across the organisation would involve invocation of Trinity's Crisis Management Plan.

4.   Principles

Business continuity management is a holistic management process that identifies potential threats to the College and the impacts to business operations those threats, if realised, might cause, and provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of Trinity's key stakeholders, reputation, brand and value-creating activities.

Business continuity planning is the documented procedures that will guide Trinity to respond, recover, resume, and restore to a pre-defined level of operation following disruption.

Business continuity management will provide an overarching framework, informed by ISO 22301:2019 (Security and Resilience Standard) and the Business Continuity Institute's Good Practice Guidelines, to support development of business continuity plans while respecting Trinity's devolved structure and recognising the challenges faced by the Trinity's diverse range of activities and services.

Business continuity plans will be reviewed on a continual basis when there is significant internal or external change. Business continuity should be embedded into business as usual to underpin Trinity's preparedness and to enhance the effectiveness of a response to an event.

Business continuity implementation will apply the Plan (establish), Do (implement and operate), Check (monitor and review) and Act (maintain and improve) [PDCA] cycle to develop, maintain and continually improve the effectiveness of Trinity's Business Continuity Management framework & programme. This will support consistent and integrated implementation and operation with Trinity's existing operations and processes.

This policy demonstrates standard compliance within the wider framework of Trinity's vision, mission, goals and values, Trinity's governance and reporting structures, the legal, regulatory, and other requirements applicable to the University.

5. Definitions

Term	Definition
Business	References to "business" are to be interpreted broadly to mean those activities that are core to the purpose of Trinity's existence.
Business Continuity	The capability of the organisation to continue delivery of products or services at acceptable pre-defined levels following disruptive activity.
Business Continuity Management & Framework	A holistic management approach that identifies potential threats to an organisation and the impacts to business operations those threats, if realised, might cause, and which provides a framework for building organisational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities.
Business Continuity Plan (BCP)	Documented procedures that guide an organisation to respond, recovery, resume and restore to a pre-defined level of operation following disruption.
Business Impact Analysis (BIA)	The process of analysing activities and the effect that a business disruption might have upon them.
Competence	Ability to apply knowledge and skills to achieve intended results
Crisis	A complex situation with a high level of uncertainty that disrupts the core activities and\or credibility of an organisation needing urgent action, significant resources and time to manage with widespread, prolonged impact across the organisation.
Disaster Recovery	Business continuity and disaster recovery are often used interchangeably, they are two distinct, but overlapping, disciplines.

Term	Definition
Exercise	The process to train for, assess, practice, and improve performance in an organisation.
Incident	A situation that might be, or could lead to, a disruption, loss, emergency or crisis.
Policy & Programme Management	The business continuity policy provides the intentions and direction of an organisation as formally expressed by the top management. Programme Management is the Professional Practice that establishes the organisation's policy relating to business continuity and defines how the policy should be implemented throughout the business continuity programme.
Prioritised Services & Activities	The services provided by Trinity College to students, researchers, academic, administrative & technical staff, visitors, and other interested parties* to which priority must be given following an incident in order to mitigate impacts. *Interested parties – a person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity.
Risk & Risk Management	A risk is the effect of uncertainty & risk management is the coordinated activities to direct and control an organisation with regard to risk. Risk Management occurs before a disruption happens, whilst Business Continuity comes into play during & after a disruption.
Threats	A potential cause of an unwanted incident, which can result in harm to individuals, the environment or the community.
Top Management	The person or group of people who directs and controls an organisation at the highest level. Trinity College Top Management (Senior Leadership) would be defined as College Officers (listed as per College Calendar), and members of the Executive Officer Group.

6. Policy

The objectives of the business continuity management policy are to ensure that Trinity shall:

6.1 Have a foundation to underpin the creation of a framework that documents Trinity's approach to Business Continuity Management and provides a consistent, overarching structure to support the development and implementation of Business Continuity Management.

6.2 The Business Continuity Management framework will include a governance model to monitor and report on Trinity's adherence to the Business Continuity policy, with reference to the Risk & Compliance Committee, and the formation of a steering group to guide the practical implementation for business continuity.

6.3 Set a clear focus for business continuity on identifying and understanding the critical, priority activities that must be carried out for Trinity to continue to deliver core services.

6.4 Identification of prioritised services and activities will be undertaken using robust Business Impact Analysis (BIA), which will seek to understand internal and external threats & risks, dependencies on suppliers, partners, and resources implications. It will agree the reasonable timeframes for activity resumption before intolerable operational impact.

6.5 Raise awareness of the interdependencies between Teaching, Research and Professional Services within Trinity and dependencies on external 3rd party suppliers.

6.6 Promote a standardised framework for the development, implementation, and monitoring of Business Continuity Management.

6.7 Develop and maintain an effective crisis management plan for use by the College, including the provision of supporting crisis communications plan and an infectious disease response

plan. The infectious disease response plan's objective is to reduce the morbidity, mortality, social, and economic disruption caused by an outbreak of a notifiable infectious disease.

6.8 Document and maintain business continuity plans and procedures. The business continuity plans shall provide guidance and information to assist the response to a disruption. Collectively, the business continuity plans shall contain details of the actions that will be taken to continue or recover prioritised activities within predetermined time frames; with reference to the pre-defined threshold(s) and a process for activating the plan.

6.8.1 It is recognised that Academic areas in Trinity depend upon the function of the central offices and critical service & support units in Trinity. These central & critical services will create, and maintain, comprehensive Business Continuity Plans that reflect the widespread impact if there is a disruption to the provision of their essential services. These plans will be reviewed and exercised on an annual basis and will be updated when there are significant changes to personnel, premises, process, suppliers and so forth.

6.8.2 Faculty, School, Departments and Research Units will develop, exercise, and maintain a Business Continuity Plan for their areas of specific responsibility. These plans will be informed by the central & critical service plans and will ensure continuity at an acceptable level in the event of an interruption to a priority activity. These plans will be reviewed and updated when there are significant changes to personnel, premises, process, partners and so forth.

6.9 All areas must nominate an appropriately competent individual(s) as Business Continuity Plan Owner (usually this would be the Head of School\Director) and a Business Continuity Planner Champion, who will coordinate the development of their area's business continuity plan.

6.10 Establish a programme of training, developed against required competencies, which will be available to all staff with business continuity management responsibility.

6.11 Assurance of the Business continuity capability of Trinity to continue the delivery of priority activities, that reflects the expectations of the Senior Leadership, will be provided through regular review and exercising of the business continuity plans. Results of exercising the business continuity plan must be formally documented and issues identified that would require a revision of the business continuity plan, additional training, or resources.

6.12 All Business Continuity impact analysis and plan documentation will be stored centrally with the Head of Business Continuity and local access will be managed by each area individually.

7. Responsibility and implementation

7.1 Trinity Senior Leadership has overall accountability for the University's business continuity management, for promoting the importance of business continuity and for the provision of appropriate institutional supports and resources as may be required.

7.2 The business continuity sponsor, the Chief Operating Officer, plays a key role providing senior level endorsement of Trinity's Business Continuity Management, chairs the Business Continuity Steering Group, advocates for and shapes the University's business continuity management.

7.3 The Crisis Management team responsibilities, (crisis classification, activation and membership to be detailed in the Crisis Management Plan), include the following specific business continuity items:

- Coordinating the response and recovery of the critical prioritised services and activities across the University
- Prioritising resources as appropriate
- Participating in post crisis incident debrief and reporting
- Participating in training and exercising

During a very significant incident the Crisis Management team may establish a separate Business Continuity Response and Recovery Team to lead out on tactical or operational responsibilities. This team will provide update reports to the Crisis Management team on impacts and mitigating actions taking place.

7.4 Senior Management in Trinity (Officers, Deans of Faculty, Heads of School, Heads of Research Institutes & Centres, Professional Services Directors) are responsible for:

- Acting as the Business Continuity Plan Owner (or nominating a Plan Owner) to ensure their area's business continuity plan is in place, signed off for their area, is exercised and that it adequately reflects the area's business continuity requirements and capability.
- Providing sufficient resource (with appropriate authority & knowledge of services and activities of the area) to act as the Business Continuity Planner Champion and ensure effective implementation, maintenance, integration, and improvement of local Business Continuity Management arrangements.
- Discussing with staff in their area the importance of effective business continuity management, their role(s) so ensuring the plans are understood.
- Ensuring all response personnel in their area have the necessary capability to respond to an incident or a crisis.
- Participating in training and exercises, supported by the Head of Business Continuity, and at a minimum this includes biennial business continuity exercising or attendance at a training session.
- Collaborating with colleagues in other areas where co-located, or where there are interdependencies in delivering priority services and activities, to ensure appropriate joint or location-based plans are in place.
- Invoking their area business continuity plan if required.

7.5 The Business Continuity Steering Group, with College-wide representation, (business continuity sponsor will act as chair and membership will be defined in the Terms of Reference which will be approved by the Risk & Compliance Committee), reports to the Risk & Compliance Committee and has responsibility for:

- Ensuring Business Continuity Management remains aligned to Trinity's vision, mission, goals, and strategic objectives.
- Monitoring compliance with the Business Continuity policy and ensuring a coordinated approach to business continuity activities across Trinity.
- Providing input and guidance into the development of the business continuity management framework, approaches, toolkits, guides, and templates to ensure they are fit for all areas of the College.
- Monitoring the phased implementation of the Business Continuity Programme
- Aids decision-making at key milestones in the business continuity planning process—for example, on recommended Business Continuity solutions to address identified Business Continuity requirements and vulnerabilities.
- Promoting a business continuity and resilience culture across Trinity.
- Agreeing actions to ensure continuous improvement of business continuity.

7.6 Head of Business Continuity has responsibility for:

- The development, maintenance and annual review of the Business Continuity Policy, Framework (including procedures, templates, and guides), and Programme ensuring that it remains aligned to the Trinity's strategic objectives.
- Overseeing the business continuity programme including the phased implementation plan, the key methodologies and establishing the standards for business continuity plans.
- Integrating business continuity crisis management into the University incident response structure, notification, and escalation procedures.
- Raising the profile of business continuity across the University, including initiating a communications campaign, and ensuring that information is available to staff (with the aim of embedding business continuity into the activities of the University).
- Developing and delivering a programme of business continuity training, exercising and promotion.
- Establishing a community of practice to support the Business Continuity Planner Champions.
- Providing and maintaining a central store for Business Continuity impact analysis and plan documentation.
- Preparing reports and compiling evidence to provide assurance and information to all relevant stakeholders in relation to business continuity for the University.

- Providing regular updates to the Risk Management Group and the Risk & Compliance Committee, Principal Committee of the Board, and making business continuity recommendations to other Trinity Committees, as appropriate.
- Working in conjunction with the risk management process, and in consultation with the Chief Risk Officer, aligning Business Continuity Management and Risk Management specifically for the risk & threat assessment of Trinity's priority services and activities, ensuring business continuity solutions fit within the University's risk appetite and tolerance, and the development of appropriate validation exercises.
- Sharing good practice and liaising with peers in other HEIs and professional sectors as appropriate.

7.7 All Staff are responsible for ensuring they are aware of:
- The business continuity policy
- The prioritised services & activities within their area
- Their own role and responsibilities during a disruptive incident, including communication and evacuation arrangements

8.   Related Documents

Standards
- ISO 22301 – Security and Resilience – Business Continuity Management
- The Business Continuity Institute (BCI) Good Practice Guidelines

Related Trinity Policy
- Data Protection Policy
- Fire Safety Policy
- IT & Cyber Security Policy
- Risk Management Policy
- Safety Statement
- Trinity College Dublin's Emergency Incident Management Plan
- Trinity Research Institute Policy

9.   Document Control

Approved by: Board

Date policy approved: 9th October 2024

Date of next review: 2025/2026

Officer responsible for review: Chief Operating Officer/Head of Business Continuity