



# **BUSINESS CONTINUITY POLICY**

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## **1.0 INTRODUCTION**

The Privatization Commission will ensure that the highest level of service to its customers and other stakeholders is maintained regardless of what might happen to its infrastructure or facilities.

There is therefore the need to deal with the many possible causes of service disruption which may affect its operations. In this connection, business continuity planning must be carried out to minimize the effects of a number of potentially disruptive events, for example:

- i. Major accidents or incidents, national disaster, epidemic, terrorist attacks;
- ii. Fire, flood, and extreme weather conditions;
- iii. Loss of utilities, including IT and telephone systems; and
- iv. Major disruption to staffing, transport, industrial action, inability to recruit, mass resignations.

## **2.0 PURPOSE**

This document sets out the general principles and processes for the creation and revision of business continuity and service recovery plans for the Privatization Commission.

## **3.0 POLICY STATEMENT**

The Commission will take all reasonable steps to ensure that in the event of a service interruption, essential services will be maintained and normal services restored as soon as possible. To ensure that this happens, the Commission will put in place robust business continuity and service plans that will be regularly reviewed and tested.

To help the Process Owners to produce robust business continuity and service recovery plans, the Commission will provide form, templates and procedures and as well as the required support.

#### 4.0 DEFINITIONS

**Service Interruptions:**-any incident which threatens personnel, assets, buildings or the operation procedures of the Commission and which requires special measures to be taken to restore normal functions.

An appropriate response would aim to maintain essential services and restore normal services as soon possible in the circumstances prevailing at the time.

**Business Continuity Management:**-This is the identification and management of risk and threats faced by the Commission, due to disruption and interruption, taking steps to control and reduce the risks, assessing the impact on the Commission if the risks should materialize and providing a plan to be followed to ensure that the activities of the Commission continue.

#### 5.0 BUSINESS CONTINUITY PLANNING

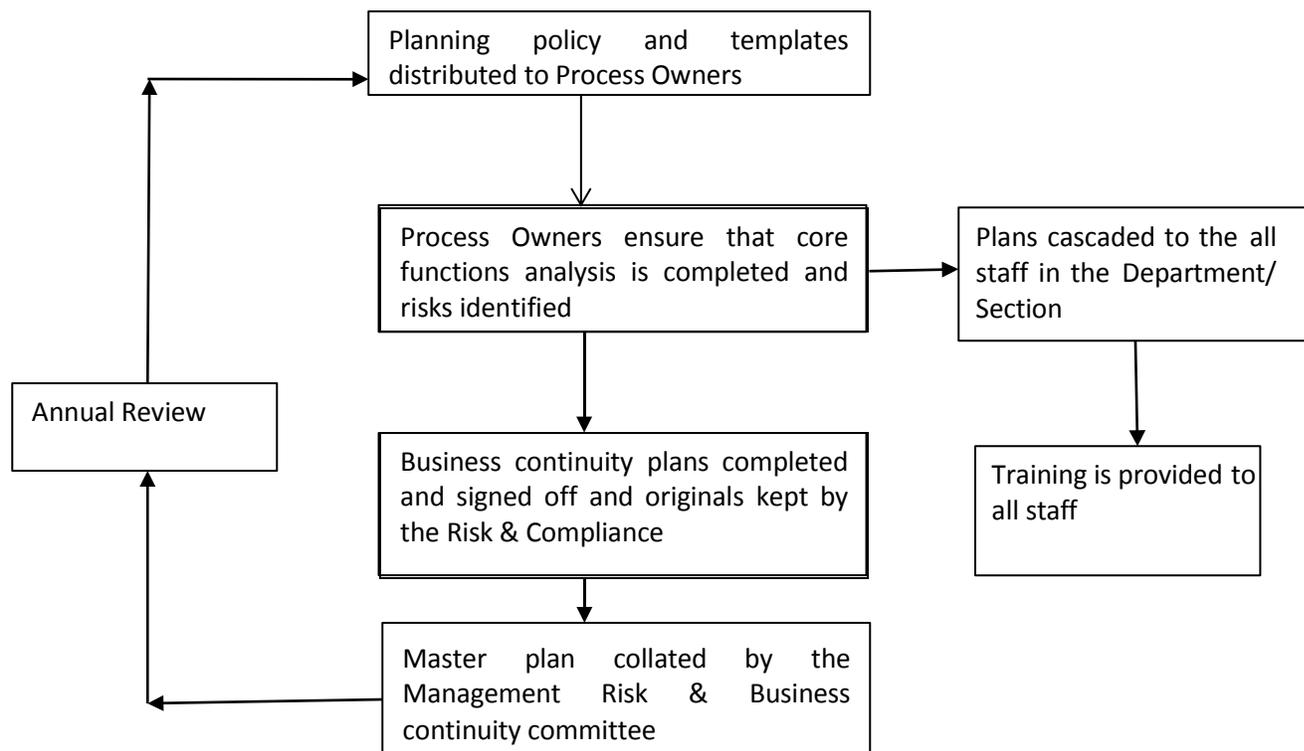
The Commission will adopt a five stage approach to business continuity planning which comprises of the following stages.

- i. Understanding the Commission's business and defining its critical / core functions.

In line with these stages each Process Owner:

- a. Is required to carry out an analysis of core functions using the attached form (Annex 2) as a guide and to then complete a business continuity plan for risks identified.
  - b. Carry out core function analysis, risk identification and business plans will be reviewed and amended at least annually or sooner if there is a major service development.
  - c. Have ownership of the business continuity plans that relate to the service it provides, each will be responsible to completing a core function analysis and identifying risks to those functions.
  - d. Cascade Business Continuity Plans to all staff within the Commission as appropriate. The original copies of the core function analysis and business continuity plans will be held by the process owners.
- ii. Identify and categorize risks and assess how they are to be managed.
  - iii. Develop a response to risks.
  - iv. Raise awareness and plans.
  - v. Maintain and audit the plans.

The flow chart below sets out the business continuity planning process:



## 6.0 BUSINESS CONTINUITY PLAN TEMPLATES

For each risk identified on the core functions analysis form, a business continuity plan will be completed using the template provided as (appendix 3)

Plans will include:

- i. The risk identified and a risk score;
- ii. Detailed action plans to reduce the risk;
- iii. Who is responsible for overseeing contingency planning and Activating plans and how the plans are done;
- iv. Who is responsible for implementing action plans;
- v. External organizations to be involved if appropriate;
- vi. Escalating procedures if appropriate;
- vii. Who within the Commission should be informed that the plan has been activated (For example the Executive Director /CEO); and
- viii. The plans will contain the information on how their implementation will be monitored and recorded.

## 7.0 ROLES AND RESPONSIBILITIES

### 7.1 The Executive Director / CEO

Will ensure that the Commission has in place effective arrangements to respond to an incident that has the potential to affect service provisions.

### 7.2 Process owners

They will ensure that:

- i. An analysis of the core functions is completed and risks are identified.
- ii. Business continuity plans are completed for each risk identified.
- iii. Business continuity plans are cascaded to all staff within the Commission who is given appropriate training.
- iv. Plans and core function analysis are reviewed annually or sooner as appropriate.

### 7.3 Management Risk and Business Continuity Committee

The Committee will ensure that:

- i. The forms and templates are distributed to all process owners;
- ii. Completed core function and business continuity plans are collated into a master document, which is kept in the Risk & Compliance Department;
- iii. The master plan is kept electronically and a web link is established within the Commission website [www.pc.go.ke](http://www.pc.go.ke) to allow ease of access.

### 7.4 All Commission staff

All staff must make themselves familiar with their individual roles as set out in:

- a) This policy and procedure;
- b) Individual business continuity plans.

## **8.0 TRAINING REQUIREMENTS.**

Completion of the form and the business continuity templates training will be provided for process owners by the Management Risk and Business Continuity Committee and training in risk management will be provided through the risk management strategy by the same committee. Each process owner is responsible for ensuring that staff's receive training appropriate to individual business continuity plans.

## **9.0 IMPLEMENTATION, MONITORING AND REVIEW**

### **Implementation**

This policy and procedure will be distributed to all process owners with an accompanying letter setting out their responsibilities.

### **Monitoring**

The development of plans against a timetable approved by the Commission Human Resources and Risk Management Committee will be monitored. Progress will be reported quarterly to the Committee of the Commission.

Through this Committee the Commission Board will be kept informed

### **Review**

This Policy will be reviewed on need basis.

## **Annex 1: THE COMMISSION CORE FUNCTIONS & BUSINESS IMPACT ANALYSIS**

Core businesses of the Commission that must be supported in any emergency situation are:

1. Executive office
2. Legal Affairs including Board functions
3. Transactions
4. Human Resources & Admin
5. ICT
6. Procurement
7. Accounts
8. Corporate Affairs
9. Risk and Compliance

Utilities and services without which the core business functions would not be able to continue:

1. Electricity
2. Fire and security system
3. IT Systems, Telephone services and communication
4. Registry
5. Vehicles
6. Office premises

## Business Impact Analysis

Management has agreed on the following business impact from disruption of core Commission activities.

#	Business Function	Occurrence	Impact
1	Board functions	Inability to execute core mandate through various Board committees i.e. Finance & Strategy, HR & Admin, Steering and Technical committees.	Loss of momentum of progress achieved by the Commission on Privatization.
2	Transactions	Inability to process the Transactions as per the Privatization Act, 2005.	Loss of momentum of progress achieved by the Commission.
3	Legal	Inability to advise the Commission on pertinent legal matters. Inability to keep critical records for the Commission.	Breach of contract resulting to legal action against the Commission
4	Finance	Inability to process payments obligations, keep financial records,	Fines, penalties and legal action against the Commission.
5	HR & Admin	Inability to administer staff requirements as per the contracts and the labor laws.	High staff attrition which may lead to slowed progress on the core Mandate.
6	Corporate Affairs	Inability to project the image of the Commission and maintain its brand visibility. Inability to respond to false media publications.	Reputational damage.
7	Procurement	Inability to procure goods and services for the Commissions use.	Slow progress on the core mandate of the Commission.
8	ICT	Inability to provide critical ICT systems that support the core functions at the Commission.	Slow progress on the core mandate of the Commission.
9	Risk & Compliance	Inability to ensure compliance with statutory and other requirements. Inability to identify, mitigate and monitor risks.	Too many risks manifesting may lead to complete stoppage of the Commission and its core work.





**ANNEX 4: RISK CATEGORIZATION MATRIX**

**IMPACT OF INCIDENT OCCURING**

Level	Descriptor	Description
1	Insignificant	No injuries, low financial loss
2	Minor	Situation immediately contained, financial loss of Ksh.10,000
3	Moderate	Some loss of service capability, situation contained with difficulty, breach of regulation, inability to achieve important target, high financial loss of Kshs. 100,000-500,00, local publicity adversely affected, loss of confidence in PC
4	Major	Significant loss of service capability, situation contained with significant difficulty, significant breach of regulation, inability to achieve key target, major financial loss of Kshs. 500,000-1M , national adverse publicity / major loss of confidence in PC
5	Catastrophic	Death, significant threat to general public, service closure, financial loss of 1M and above, national / international adverse publicity / severe loss of confidence in PC

**Likelihood of incident occurring**

Level	Descriptor	Description
1	Rare	May occur in exceptional circumstance
2	Unlikely	Could occur at some time
3	Possible	Might occur at some time
4	Likely	Will probably occur in most circumstances
5	Almost Likely	Is expected to occur in most circumstances

**ANNEX 5. RISK CATEGORIZATION MATRIX**

**Overall risk rating**

Likelihood	1-Insignificant	2- Minor	3-Moderate	4-Major	5-Catastrophic	Action
1-Rare	1	2	3	4	5	No immediate action is required
2-Unlikely	2	4	6	8	10	Action within 12 months
3-Possible	3	6	9	12	15	Urgent action
4-Likely	4	8	12	16	20	"
5-Almost Certain	5	10	15	20	25	"

**ANNEX 6. COMMISSION RISK REGISTERS/BUSINESS CONTINUITY PLANS**

The Commission has developed the following risk registers per function each containing detailed business continuity plans and escalations. The BCP should be read in tandem with the risk registers.

1. Legal Affairs
2. Transactions
3. Human Resources & Admin
4. ICT
5. Procurement
6. Accounts
7. Corporate Affairs
8. Risk and Compliance

## **ANNEX 7. DISASTER RECOVERY PLAN & POLICY**

The Commission has developed a disaster recovery plan covering the impact of downtime from ICT on the Commission's operations. This Policy should be read in tandem with the DRP.