

Scottish Funding Council

Business Resilience & Recovery Policy Statement September 2022

Title	SFC Business Resilience Policy Statement
Policy Contact	Assistant Director Risk, Governance & Compliance
Policy Owner	Deputy Director of Finance and Operations
Policy Approval	Board
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This Policy forms part of the Scottish Funding Council Policy Framework and is supported by additional guidance documents. It is the responsibility of all SFC colleagues to comply with the requirements, including reporting any exemptions, breaches or requests for alternations to the Policy Owner.

Business Resilience Strategy - Background

1. As a Non-Departmental Public Body, the Scottish Funding Council (“SFC”) recognises the importance of managing Business Resilience and the potential risks resulting from a failure to recover critical processes, people or systems, following a major event.
2. Business Resilience is a characteristic of an organisation and is a relative, dynamic concept where an organisation can be regarded as sufficiently resilient to remain within its own defined statements of risk appetite. For purposes of this document Resilience is defined as:

“The ability of SFC to identify potential threats and quickly adapt to disruptions while maintaining continuous business operations and safeguarding people, assets and overall brand or brand value creating activities, even in the face of adverse events, or chronic and incremental change.”

Business Resilience Objectives & Appetite

3. The SFC aims to provide a superior level of support and services to our colleagues, institutions and stakeholders on a consistent and uninterrupted basis. It is accepted that on occasions this will not be possible and in such times, the SFC aims to recover business critical services within tight timescales to minimise disruption.
4. The SFC aims to ensure critical business services and processes can continue to be supported in the event of a complete loss of SFC’s office, contents and infrastructure through utilising a combination of the ICT Continuity Strategy and manual procedures.
5. Risk Appetite has been assessed as MODERATE, which is defined as ‘Tending predominately towards exposure to only modest levels of risk in to achieve acceptable, but possibly unambitious outcomes or benefits.’

Policy Statement

6. The overall objective of this Policy Statement is to describe the SFC’s risk appetite for Business Resilience Risk, the guiding principles, responsibilities and requirements for the development, monitoring and management of risk, within Risk Appetite. Business Resilience impacts all activities in the Group and will overlap with other Policies.
7. This Policy Statements describes the principles to which the SFC should adhere and is supported by underlying Policy Standards and key Strategy documents, noted in Section 14.

Scope

8. This Policy Statement applies to all areas of the SFC. Third Parties, including service providers upon whom the SFC is dependent for critical services are expected to meet the guiding principles, or advise where there is a material gap.

Principles

9. The following principles are in place to support the effective management of Business Resilience Risk in the SFC and are managed in accordance with the underlying Business Resilience & Recovery Policy:
 - Risk Appetite sits with the Board, but day to day management of Business Resilience Risk is the responsibility of every colleague;
 - Roles and responsibilities are clearly defined in relation to the management of Business Resilience Risk, including the role of key governance committees;
 - A Business Resilience & Recovery Policy is in place and ensures the SFC has the ability to identify critical processes, manage incidents and recover from, adverse situations in line with the business resilience objectives;
 - The Business Resilience & Recovery Policy includes Disaster Recovery plans and is regularly tested;
 - The Business Resilience & Recovery Policy is underpinned by an immediate response and clear escalation process;
 - Colleagues are aware of their responsibilities and have access to the Business Resilience & Recovery Policy, and embedded processes in each area;
 - Colleagues are supported by education and awareness that is appropriate to their role, and available as part of the induction process;
 - The Business Resilience & Recovery Policy is reviewed regularly and updated to reflect changes in the organisation structure or critical processes;
 - The Business Resilience and Recovery Policy includes the responsibilities of a formal Incident Response Team to manage the response to any adverse situation, including immediate resolution and any longer-term remediation;
 - Incidents will be classified by materiality, to ensure an appropriate level of management response is put in place. This is defined as:
 - Red – Major Incident
 - Amber – Significant Incident
 - Green – Minor Incident
 - Regular reporting on Business Resilience will be available to the senior management and reviewed by SFC Board Governance Committees, as appropriate.

Roles and responsibilities

10. The table below outlines the Business Resilience Management roles and responsibilities within the SFC.

Board	Responsible for approving the Risk Appetite and the Business Resilience & Recovery Policy Statement.	
Committees	Responsible for supporting the Board in its discharge of duties, including the oversight on operational effectiveness.	
Strategic	Chief Executive	<ul style="list-style-type: none"> • Ensure the Business Resilience & Recovery Policy meets the SFC's legal and moral obligations. • Provide Executive Leadership for Red (Major) Incident, including: <ul style="list-style-type: none"> • Inform the Board Chair of any Major Incident and approve external communications, including media statements and interviews. • Approve media strategy, key statements and front media interviews and communication with key stakeholders, including Scottish Government. • Agree management priorities for resolution of major incident and timelines.
	Scottish Government Representative	<ul style="list-style-type: none"> • Ensure that Cabinet Secretaries, the Departmental Accountable Officer, the Council's Sponsor Directorate and the Scottish Government Press Office are aware of the current position and are kept up to date with developments. • Collaborate with the incident team to share communications from Cabinet Secretaries, advice and best practice on managing Business Resilience Risk.
Operational	Director of Finance	<ul style="list-style-type: none"> • Develop the Business Resilience & Recovery Policy, ensuring it meets the

		<p>SFC's legal and moral obligations, and is proportionate.</p> <ul style="list-style-type: none"> • Determine organisational priorities and delegated authority in relation to Business Resilience & Recovery. • Implement the Business Resilience & Recovery Policy liaising with the Scottish Government, if required. • Overseeing provision of essential information to continue core services. • Oversee provision of Critical Programmes of change, which may impact or increase risk exposure from material incident. • Oversee provision of support for staff depending on nature of incident.
	<p>Senior Management Team & Business Management</p>	<ul style="list-style-type: none"> • Implement the Business Resilience & Recovery Policy & Plan, ensuring it is roles and responsibilities are understood and embedded in operational activities. • Ensure that colleagues with responsibility for any aspect of compliance with the Business Resilience & Recovery Policy are competent to discharge their obligations effectively. • Ensuring there is sufficient capacity to meet the operational requirements of the Business Resilience & Recovery Policy and Plan. • Manage internal and external communications in line with the requirements of the Business Resilience & Recovery Policy.

Policy Exemptions

11. All policy exemptions must be submitted for approval to the Business Resilience & Recovery Policy Owner, including an assessment of the potential increase in risk exposure, with a rationale and a plan of actions to mitigate.

Policy Breaches

12. All policy breaches must be notified to the Business Resilience & Recovery Policy Owner within a minimum of 5 working days. Breaches will be assessed in accordance with the materiality assessment and any breach that results in a financial loss or other non-financial impact, above the agreed Risk Appetite will be recorded centrally, and tracked to resolution.

Reporting

13. Regular reporting on levels of adherence to the Business Resilience & Recovery Policy will be presented to the Audit & Compliance Committee and Board. Material issues will be discussed as part of the Strategic Risk Register, with policy breaches, issues and waivers reported by exception to the Policy Owner or Contact.

Policy Standards

14. Policy Standards are required to be in place setting out the minimum standards that support the management of this Business Resilience Policy Statement, including:
 - Acceptable Use Policy Standards
 - Business Continuity Policy Standards
 - Data Collection & Sharing Policy
 - Fair Processing Policy Standards
 - Information Security Policy Standard
 - ICT Strategy
 - Disaster Recovery

However, Business Resilience covers all aspects of people, processes, systems, property, and external events, which will be managed by controls in other Policy Standards, including management of change, data protection, health & safety.