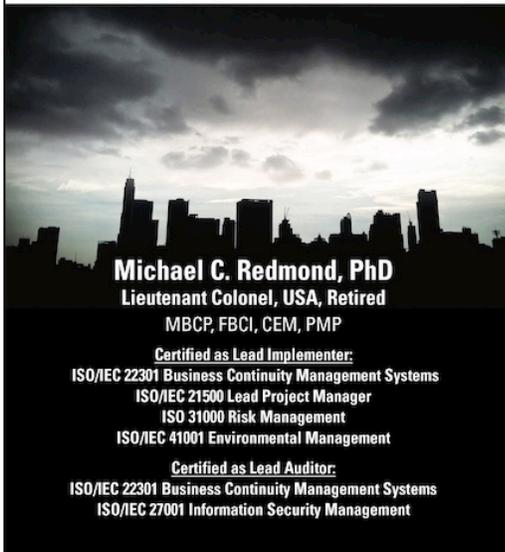


Mastering Business Continuity Management



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Mastering Business Continuity Management



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Chapter Four - Business Continuity Strategies

Overview

Regardless of the definition given, there will always be another best practice out there or another professional practice or standard that uses a different definition, but they have the same meaning. Determine and guide the selection of alternative business recovery operating strategies, including everything needed to keep the organization in business.

- Equipment
- People
- Resources

Pre-Strategy Development/Review

Before you develop or implement a strategy to eliminate a hazard, or to mitigate the effect of a hazard that cannot be eliminated, review your Risk Assessment again, and your impacts. You absolutely must have covered in detail the Risk Assessment and the Business Impact Analysis. You cannot skip those sections.

If you know you have a poor roof, you can probably mitigate the problem by fixing the roof.

However, the fact remains that in some cases, even with proper planning, things happen that the organization is not prepared for and may need to recover from.

That is why you do the Business Impact Analysis. Once you know the impact of something then you can decide whether you are going to develop a strategy to mitigate it, or whether you are going to develop a strategy to recover from it.

A previous example was having an old car.

- You may choose to mitigate an accident by putting in new brakes because you decide the impact is too high not to.
- You may choose not to mitigate making it rustproof; because it's so old, it probably will not make it another few months anyway.
- You may decide just to recover by fixing any holes that appear.

It depends on what the impact and the cost associated will be. Base the mitigation strategy on

- Business Impact Analysis
- Cost Benefit Analysis
- Hazard Identification Risk Assessment

- Your operational experience

Advisory Committee and Records Review

When your Risk Assessment and Business Impact Analysis are complete, have a Strategies introductory meeting with your Advisory Committee.

Remember that your advisory committee should already have committee members on it including

- Engineering
- Environment
- Finance
- Health and Safety
- Information Technology
- Legal
- Maintenance
- Personnel
- Plant operations
- Public Relations
- Risk Management
- Security
- Transportation

It should include someone from the stakeholders, fire and rescue, public works and maybe even the National

Guard. It might even include Homeland Security, stakeholders, and the military. Add members based on whomever you think you are going to need as advisors.

Every phase in Business Continuity planning should involve meetings with the key players including your advisory committee. At this meeting, you will review all of the risks that came up in your Risk Assessment, and you will review all of the impacts from the Business Impact Analysis. Ensure you do a complete records review prior to this meeting so that you remember everything. Sometimes, a few months may have passed before you actually start working on the strategies, and although you think you will remember all the impacts, you may have forgotten something. So make certain you review the facilities.

- What were the impacts to the structure?
- What were the impacts to personnel, the prophecies for every risk?
- What about the products, activities, equipment, and materials?

Take many photographs during your Risk Assessment phase, so that now in the strategy development phase, you can depict some of the areas requiring shoring up.

Put together your “maybe” list of things you could possibly do for each area at this point. This is a brainstorming session. Consider everything you might

do to mitigate situations, or recover from them. You may choose to do both a mitigation strategy and recovery strategy areas to present to Management. Then they can make the informed determination which way they would like to go, depending on how costly each strategy is.

Records Protection

Develop strategies for protecting vital records.

Unfortunately, there were many companies that used an Off Site Storage Vendor to store their records, and of course, they believed them to be safe because that was the Off Site Storage Vendor's core business. However, the Off Site Storage Vendor did not have a good Business Continuity Plan, and all these corporations' plans, all of their documents, all of their vital records were destroyed. Worse still, the back-up copies were destroyed in some cases. In other cases, the originals were destroyed because the off-site vendor that they chose did not have a good Business Continuity Plan.

Ensure that the vendors you are using have a Business Continuity Plan in place. You should absolutely require that they have an audit done ahead of time, a Gap Analysis by an independent third party, and that they can show you the results. Perhaps your records happen to be all in one room. Consider splitting the vital records up into different rooms or different buildings. Consider taking your Data Center and splitting it up into two or three different locations.

Include a provision for protected systems or equipment. Remember, you cannot forget your security, particularly your Information Security. Cyber Security is critical in a recovery mode. It is very simple for someone to set your building on fire to have everybody evacuate the building, hoping to leave you vulnerable.

So far

- You have already ensured detailed control practices in the prior phases.
- You know what compliance documents you need pertaining to records.
- You have documented all of your interviews so if you have additional questions you can go back to the same person that you spoke to in the risk section or in the impact section.
- You are going to review your working papers just one last time.

This sounds repetitive and just common sense, but many entities failed to go back and double check, with negative results.

Strategy Brainstorming

A great deal of “pre-thinking” goes into strategy development. If more entities would spend two weeks just brainstorming they would save a fortune in recovery costs, a fortune! This is the phase that most companies, most entities, most government agencies,

race through. It is especially important just to brainstorm. Sometimes a simple idea can come from somebody on the line who works with it every single day. When you are coming up with strategies, try to speak to people about it. “These are the situations we are considering, these are the impacts, and does anybody have any ideas?” Do not make the mistake of thinking that you know all the ideas or strategies. The greatest ideas have not even been considered yet!

Once you have some different strategies you are contemplating, you may want to have a vendor day where you bring one vendor in for each strategy and have them educate you. Tell the vendors ahead of time that you may not end up using their services, but certainly do let them bid in exchange for coming in and educating you.

Before you even decide on corrective actions for the strategies, you’ll need to decide the resources needed for each strategy.

- How do you get approval for compliance, if in fact, you are going to miss deadlines?
- How is training done? Do you have a strategy on how you are going to exercise, evaluate, and do corrective actions during your testing?
- How much additional equipment or facilities are needed.

- In terms of Finance and Administration, how are you going to deal with strategies for payroll, strategies for accounting systems, and tracking documents cost? Think through now every strategy that you are going to be utilizing later on in the plan.
- What if you are a trading firm and you cannot clear?
- Will additional personnel be needed?
- Will additional training be required?

Communication With Your Team

Conduct daily briefings with everybody on your different teams. These briefings can be short phone conference calls. Just make sure everybody's strategies are consistent.

This is important when you have different departments and one department is saying, "If X happens, we are just going to work at home. It's not a problem." The other department is saying, "If X happens, we need to be co-located with this department in order for our strategies to work." Now you have two different strategies and what often happens is that you wind up with very different approaches. Coordinate to ensure everyone is working towards the same goal.

- You will want to find a system for documenting your findings. There are

commercial software packages available that are great, but you can also use Word or Excel if you have a small organization. It does not matter so much what software you use, as long as you are documenting all of your findings in a simple format that everyone will be able to use.

- Establish an agenda of exactly how you are going to approach the strategies and how to use your time wisely. Strategies often take years to put together, but they should take no more than months. Keep a balance between your document reviews, your interviews, and your observations when you come out with strategies.

Consider Your Culture

Once you have an understanding of your organization's perspective and management views, which you should already have through your prior phase work, you will know right away if there is absolutely no way they are going to use a commercial Hot Site. You will know right away if they definitely would like you to find a way to keep the recovery handled internally. You will know right away if they are leaving it up to you to use your professional judgment.

When you are looking at strategies, please do not look at another organization's strategies and take the same approach they did just because it looks good and looks

like it will save you time. Acknowledge cultural or regional differences.

For instance, one firm in the Northern United States decided that they were going to recover at a Hot Site in Canada. It was so close. The plan recovery existed only in English. The Business Continuity Planner did not realize that many of local employees who were supposed to assist in the recovery spoke French. The plans needed to be in French also. Obviously, this created multiple problems. They had not acknowledged the bilingual laws, cultural or regional differences.

For instance, one firm in Northern United States decided that they were going to recover at a Hotsite in Canada. It was so close. The plan existed only in English. The Business Continuity Planner didn't realize that many of the staff in the particular region of Canada where they were recovering during an emergency was familiar with French. The plans needed to be written in French also. Obviously, this created multiple problems. They didn't acknowledge the cultural or regional differences of where they were recovering, and exactly where the employees were.

The moral of the story is that when you are creating your plan, consider communication with the entire organization and not just model it after your specific locale. Your strategies have to be flexible. You must use common sense, always apply curiosity, and question whether your methods and approach make good sense.

Documentation

Document everything you do and write down the reason why.

If someone tells you in three months or so, "That seems like a great idea, but I am not really sure it makes sense for our organization," you will not

remember why you decided it was a good idea at the time unless you document your reasoning. Remember when you finish the strategies you are going to have to go to the Board or Management level and do a presentation of your strategies.

Know exactly what you are doing. Always go to legal counsel during strategies formation. Include them to make sure that the strategies are still meeting with local requirements and local laws. Even in an evacuation strategy, prior approval may be required from the region to allow employees to assemble on a crowded city street.

As you are going through and figuring out your options, write a summary, not a full report yet, of every brainstorm idea. Document the deficiencies and benefits of particular strategies.

Cost Analysis

Provide a Cost Benefit Analysis to Management.

Obviously, the benefit part of the equation is how great the strategy is, while the deficiency or the cost, which we tend to use in different countries, does not mean only financial cost, but also deficiencies in the idea itself.

You have an old car and you decide to spend money mitigating a possible rust situation. The cost would not only be the dollar cost of the work done, there is also a possible cost if you choose not to do anything at this time. There may be a possibility of the problem worsening to the point of not being able to recover at all. Depending on when you noticed the rust, it may have already caused too much damage from which to recover. Maybe for an old car you don't care. If you have a new Porsche, you probably do.

Document Control

There are legal issues you have to address, especially for document liability and confidentiality concerns in your strategies.

For hospitals operating under a HIPAA (Health Insurance Portability and Accountability Act) requirement, you must determine who has access to the records. Remember, customize your strategy documentation according to what management is used to seeing. There is no single optimal approach. However, you must have document control. You need a place to secure your assessment notes. You must know your distribution channel. How many people will need to see the strategies? As you go through the process, the chain may change, but control the process. Make allowances for staff changes, and ensure privacy and proper chain of command controls.

There is a balance between broad communication and a need-to-know.

Funding and Legal Issues

Before you start the strategies, you will want to know what your funding is going to be.

If you know that you are working for an organization that has a very low budget, you won't even bother looking for strategies that are expensive. Adopt temporary actions or temporary strategies in the interim. There are legal issues that may exist. Maybe there are legal incentives.

Therefore, it is very important that your mitigation strategy consider and include the use of applicable building construction standards. You do not want to do a quick fix that's not going to meet with construction standards. Again, if you are in Country A, you have different building codes than you do if you are in Country B. Building codes and variances differ from place to place. Even if your area's codes are more lax, please consider using a tougher standard to show your standard of care, and possibly to prevent future loss.

Hazard Mitigation

Under mitigation, establish hazard mitigation through appropriate land use practices, especially within manufacturing organizations.

During a fire, you cannot simply take everything and throw it into the lake because that would cause an additional hazard. In one area, farmers, who unfortunately had animals die during a terrible storm, could not bury the animals. This was because by the time the people got back in to take care of the animals, the carcasses were infested with little bugs, that once put into the ground, would cause a fermenting process that would have gotten into the water and food supply. They also couldn't burn the animals because then it would be airborne. Now they had a very big problem. There were strategies, but they needed to find them.

Before you develop strategies, you must make certain you know your land use practices in your area. As part of your mitigation strategies, consider relocation, retrofitting, and removal of structures at risk.

- Can employees do it? Or can only a specialist do it? Are there union rules that apply even in a disaster?
- How can you remove or eliminate the hazards?
- You may decide mitigating this hazard is just too difficult, too expensive. However, maybe you can limit the damage.

For example, if you know that you are near a water-based area, you may have sand bags on hand that you can use. If you know that you are in a natural area where you are going to have hurricanes, you may have wood that you can put on the windows. For larger entities, you may choose to have metal windows like many corporations do, where you press a button and they go down during the time that you are expecting terrible wind storms, protecting the windows.

The wood is certainly cheaper, but not when you consider the number of people that you have to hire to put them up, at a time when they want to be home boarding up their own windows.

There is no complete elimination of a hazard, because we never can be positive that we can eliminate something.

- If you're afraid that the roof you have is not going to be good enough, and you replace that roof, you may be eliminating the risk from that roof falling in, but you now need to do an assessment of the new roof. How long have you had the new roof and how long is it going to last?
- If you have decided to put in a new computer system, and the users and the technology agree that you will need to have these applications up within 24 hours, do you have the people to be able to support that during a disaster? If not, how many people do you need to pre-train to come in and be there?

Let's assume for illustration purposes that the hazard is a hurricane.

- One risk is the roof caving in or blowing away.
- Another risk could be the windows breaking, causing injury, and water damage.
- Another risk could be injuries from flying debris to employees coming into work.

There can be numerous risks posed from one hazard. Review the rate of release of the hazard. For instance, if you know that you have a natural hazard that you have received a warning about, what can/must be

mitigated in the first hour? What can/must be mitigated in the second hour, third hour, and fourth hour? Establish a hazard warning or communication procedure. This is important for all of the employees and their families.

Assessing Strategies

Consider

- Critical Systems
- Equipment
- Information
- Materials
- Operations
- Redundancy or Duplications of Essential Personnel

Now that is easier said than done. It does not mean you have to duplicate everything. In fact, if you have a manufacturing organization, duplicating everything may be cost prohibitive, and can put the organization out of business. However, backing up a server or having duplicate servers in different locations might be a better solution.

Consider these resource management objectives among others.

- Equipment
- Facilities

- Personnel
- Training

All of these require both mitigation and recovery strategies.

Sample disaster purchasing strategy

- Depending on what country you are located in you may be able to get a line of credit with the bank.
- Give credit cards out to everybody on your BCP Staff to purchase, but with limits.

What if the strategy says Department “A” has to have the following applications up and running in two hours? However, Department “B” doesn’t need them for 6 days. If you have agreed that Department “A” absolutely must have it up and running in 2 hours, then the least common denominator wins. This is why it is so important when you are doing a Business Impact Analysis that you try to get the different departments to push back as much as you can. If one department agrees it has to be up in two hours, and no one else in the organization needs it for 3 weeks, that application is up in two hours if the impact of that department is high enough to deem it necessary. It’s a decision.

The assessment of your strategies considers the resource capability of the vendors and internal

solutions. What are the shortfalls, and were there steps necessary to overcome any shortfalls? That may involve new technology. It may involve doing business in a different way than you do business now. You are going to have to do a current inventory of your internal and external resources before you can even determine what your final strategy is going to be.

Mutual Aid

As part of your strategies, do not forget voluntary donations, solicited and unsolicited, as a strategy for managing them. Do not forget mutual aid.

- Does the organization have a Mutual Aid partner? This can be another location that the organization owns.
- Is there another location that can support you?
- How much can a Mutual Aid partner offer to your organization before it causes a problem for them?

Think of it this way. Remember when you invite your in-laws, how long do you really want them to stay? When you go to someone else's location during a disaster you're considered the in-laws. Some in-laws are great, and you want them to stay for 2-3-4-5-20 years.

You don't know when you give mutual aid to someone, or when someone gives you mutual aid, that they're probably going to expect it back. It's usually a joint mutual aid agreement, and it should be in writing even if it's internal.

- What specifically, how specifically, how long specifically are they going to provide mutual aid?
- Are you welcome to stay there 3 days, or are you welcome to stay there 30 days? Most strategies documentation recommends you plan for 30 days. After 30 days you can either get back into your main location, or make other arrangements.

What about mutual aid?

- What are you willing to give?
- What are you willing to get?

A Bank had a fire and they were out 3 months, as was the insurance company next door to them, even though the insurance company did not have a fire. The water it took to put out the Bank's fire damaged the insurance company next door. They also were out of business, even though they really didn't have the original disaster. They had a secondary disaster.

Strategic Plans

Document a full strategic plan.

This is the mitigation and your recovery strategies. It includes the cost and includes everything that you are going to do.

Again the strategic plan is based on your vision, mission, goals, and objectives of the program as covered in Chapter One. The strategies that you are going to do are going to start to form the Emergency Operations Response Plan, because whatever strategies you agree on will then be put into your plan.

Develop two or three different strategies for every situation -- An "A," "B," and "C."

- Strategy A is an Inexpensive strategy, "It will only cost this much money, but it will cost the

organization this much in quantitative and qualitative costs for not recovering in this amount of time.”

- Strategy B is a Medium Cost strategy. “This is how much it is going to cost in money, but it will cost us this much in quantitative and qualitative cost such as lost resources and a poor image.” Go back to the Business Impact Analysis, of course, to get this information.
- Strategy C is a High Cost strategy. “This is a very expensive strategy, but will not be out of business for more than two hours. There is little quantitative and qualitative cost.”

Of course, this assumes the strategy works. If you are doing your research properly, you are basing it on best knowledge that in most cases 99.97% of it will work.

Crisis Communication, Teams, and Reporting Relationships

Some strategies to include

- Central contract facility for the media
- Disaster information handling system strategy
- Protected action guidelines and recommendations, like shelter and place for evacuations
- Strategy for communicating with special needs populations, depending on your organization

- Strategy for pre-scripted information bulletins
- Strategy to coordinate and clear information for release before it's sent to the press

Within the strategies, it is important to determine reporting relationships, responsibility, and chain of command.

- Are you going to have strategies for each department to recover itself?
- Is each recovery team going to have its own strategy?
- On the other hand, are you going to set up teams?
- Who has finance authority?
- Who has reporting relationships in a disaster mode?

Setting up teams with different responsibilities makes recoverability so much easier.

Utilize various team structures.

- Search and rescue team. That doesn't mean sending somebody into a fire. That could mean that in a national or regional emergency, you have people contact employees to find out their status, and be sure they're safe.

- Separate team that has a human resource function. Who is going to go to the hospitals and visit people? While this may not normally be a responsibility for human resources, professionals from this area tend to have the personality, the benefit knowledge, and the policy awareness, so it typically is a good source.
- Support teams.
- Transportation team. How are you going to relocate supplies and people?

A major Regional Disaster hit a Large Consulting Corporation. They needed to reach their employees and had nothing in place.

They didn't have:

- Strategy for finding people.
- Secondary numbers for people.
- Strategy to verify if employees were safe.

Recovery Strategies

Now that you understand your available alternatives, your advantages and disadvantages, and your cost ranges you have

- Consolidated strategies

- Developed a business unit consensus on how you are going to do everything
- Identified offsite storage requirements and alternative facilities.
- Identified viable recovery strategies
- Presented your initial brainstorming ideas to management or to your Steering Committee

Now you actually start doing the final work on your strategies for the plan.

It is critical that you review, review, and review.

Review

- Alternative recovery strategies
- Business recovery issues
- Communications
- Comparison of both internal and external solutions
- High-level pre strategies
- Locations
- Options
- Personnel
- Research of possible vendors
- Technology recovery issues

- Time frames

You have your old car with rust, but you are willing to get a hole in the car. The car can still drive; it's not going to affect its functionality. It won't look great, but you are not really worried about the rust.

Doing nothing is a viable strategy, but document it. You cannot simply do nothing and say, "We plan on doing nothing." You have to document why you have chosen to do that specifically.

We have discussed the NFPA, the Disaster Recovery Institute, and the Business Continuity Institute. FEMA developed a Capability Assessment for Readiness. Under CAR, the recovery strategies use different wording, but they really encompass the same areas as mentioned earlier. Certain countries use CAR in their Emergency Management Planning, so you should be aware of it if it pertains to your organization.

Some of the strategies generally agreed upon by best practices are

- Do nothing
- Defer action
- Manual procedures
- Reciprocal agreements
- Alternative site or business facility

- Alternate source of product
- Service bureau
- Consortium
- Distributed processing
- Alternative communications
- Mitigation
- Preplanning

Usage of Vendors/Consultants

Compare your internal and external solutions before you even decide on a recovery strategy

It may be sometimes less expensive to go outside to do recoverability. Even to do planning, sometimes it's less expensive to go outside, because you are not taking your personnel and having them spend ages going through and doing research that maybe a consultant or specialist already knows the answers to.

Vendor days are effective! Bring in all of the specialists in who know their area inside and out. They know the latest best practices and products.

You are assessing the risk associated with every operational recovery strategy. You have already done a Risk Assessment. This is assessing the risk of the strategy.

For every strategy there's a benefit and a cost.

- This is a great strategy to use, however, what if our vendor's plan doesn't work?
- What are the chances of that happening?
- How do we feel secure that is not going to happen?
- How do we know this vendor that we are counting on will still be in business at the time of disaster?
- How do we know they're going to be there for us when we need them?

Review the strategies!

Presenting Strategies to Management

Now that you have everything documented, it's all in front of you, and you are feeling great. You are finalizing your strategies by assessing the suitability of Alternative Recovery Strategies against the results of the Business Impact Analysis. Review the Business Impact Analysis for every strategy you have decided on again and double check

- Is the strategy that you are doing consistent with the analysis?

Maybe the impact to the organization wouldn't be so bad if that department wasn't in existence, even though that department deems itself absolutely critical. You must make that assessment. You have to

develop a consistent method for your evaluation. Set a baseline criterion for your options.

- Why are you saying this is a viable strategy?
- What's a realistic time schedule for valuation and report writing?

You must consider this strategy in detail before you present it to management. Ensure you write it in a way that management can understand. Deliver concise, specific recommendations to Senior Management. You are not going to be there for every meeting they have while they are deciding what's critical for them to do. This includes going back to your original list.

You may choose instead of having a different strategy for every single hazard, to cover a general strategy that can deal with all of them, such as relocation of personnel. It's up to you.

Have strategies for manmade events.

- Accidents
- Biological
- Building collapse
- Chemical
- Emergency
- Explosions
- Fire

- Fuel
- Power
- Radiological
- Resources
- Transportation
- Utility

Every strategy has its own risk; every strategy has its own impact.

- How are you going to get fuel?
- How are you going to deal with fuel during a resource shortage for that generator?

Please don't go too deeply into this. You could be spending years doing strategies. Think of the obvious, but make sure you present it. Think of those that are not obvious that might be important, and present them too.

For instance, you could have a strike going on, and you might have a utility problem at the same time. Look at all your different strategies individually. Don't look at them as a whole. Select alternate sites for your off-site storage. It's important for you to understand contractual agreements through Business Continuity services. That includes how to prepare a requirements statement. This is where you might get

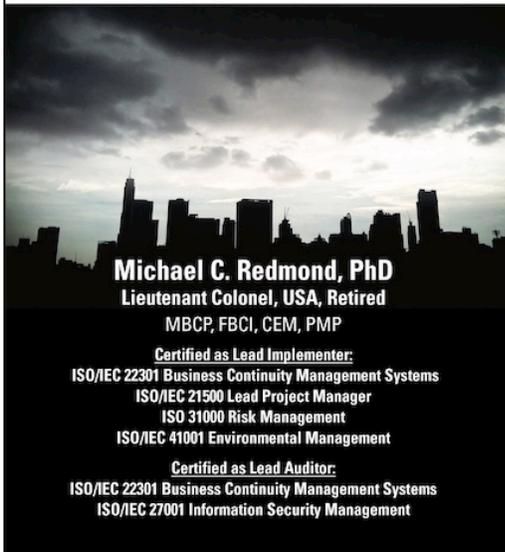
your lawyers involved in your strategies. Have your lawyers help you with your agreements.

- Get the approval from your Advisory Committee.
- How are you dealing with strategies again for maintenance?
- How are you dealing with strategies for every assumption that you think you might have forgotten? Things that just don't seem important now may seem important later.
- How are you going to choose your alternate vendors?
- How do you change that strategy?
- In your documentation, you are not writing procedures for the individual teams in detail, but do list descriptions of what each team would do.
- Ensure you have strategies for emergency telecommunications, voice communications, data communications, recovering and restoring voice communications, alternate routing, dial back-up, foreign exchanges, whatever it is you have to do. The data has to include your security. It has to include strategies for exercising it to make sure it actually works.
- Ensure your strategy is enterprise wide, that it deals with each business unit.

- Put into place your strategy for change control.
- What if things change?
- What if your vendor goes out of business?

Finally, this is also the perfect time to put together a strategy for auditing your program. Ensure that you have the Audit Department or an independent party involved as you progress through the planning process.

Mastering Business Continuity Management



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by Dr Michael C Redmond PhD

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