

**Registers of Scotland****RoS Board****11 June 2024****Business Continuity and Incident Management****Purpose**

1. The paper provides an update on Business Continuity (BC) and Incident Management (IM) arrangements following improvement activity.

**Recommendation**

2. RoS Board is requested to note the update.

**Background**

3. Enterprise Risk Management (ERM) initiated a new approach to BC in June 2022. The approach was piloted then extended to all teams by December 2023. The new approach responded to recommendations in an SGDIAA Business Continuity Internal Audit Report (March 2022).

4. Improvements in BC highlighted an opportunity to make similar advances in our approach to IM. ERM developed and introduced a new IM framework in April 2024, complementing Digital and Estates IM processes and linking to local/team BC plans.

5. The IM framework is used *during* incidents, BC planning takes place *between* incidents incorporating any lessons learned *from* incidents.

**Business Continuity**

6. The approach has increased our BC capability and maturity by introducing these key elements:

- a. enhanced BC governance including a BC policy, BC Steering Group, Director approval of BC documentation and EMT identification of Important Business Services (Annex 1)
- b. a systematic 3-stage BC planning process including Business Impact Analyses (BIA), BC plans and annual BC exercises (Annex 2)
- c. increased focus on training and awareness including material on RoSnet, link to the HR induction process and guidance for team leaders

Taken together this constitutes a more systematic and robust approach to BC and forms the basis for continuous improvement through the annual review process.

**Incident Management**

7. The IM framework replaces what was known as the RoS Primary BC Plan and introduces these key improvements:

- a. alignment (with Digital and Estates\*) and simplification (from 5 to 3) of organisation-wide incident levels enabling clearer escalation and description of impacts (Annex 3)
- b. introduction of 'lead IMT incident manager' role (drawn from the C2 Incident Management Team (IMT) group) – this frees up Digital / Estates incident managers to focus on the 'technical' response to major or exceptional incidents
- c. supporting materials for IMT members including IM 'quick guide', IM comms guides, and detailed step-by-step IM process guide
- d. link between Important Business Services and the individual BC plans that underpin them (Annex 4)

\*the scope of this update is enterprise-wide BC and IM. Significant supporting activities, plans and exercising are in place within Digital and Estates such as Disaster Recovery (DR) testing, the Information Security Management System (ISMS), Emergency Evacuation procedures and IT Major Incident Management processes.

8. The IM framework was published on RoSnet with an accompanying article to raise awareness amongst all colleagues. ERM have separately engaged with EMT and C-Band colleagues, many of whom form the IMT and are directly involved in the incident management process. The IM framework and process is now 'live' and has been successfully used in incident response.

### **Assurance and Next Steps**

9. An organisation-wide BC exercise led by an external party is planned for Q2 24-25. This builds on a similar exercise conducted in 2022 and will test the effectiveness of our BC approach and the IM framework that underpins it. A summary of the exercise and lessons learned will be shared with ARC later this year.

10. ERM continue to support colleagues in the annual review of BIAs and BC plans, and in BC exercises. Improvement opportunities include:

- a. learning from the approach to the externally facilitated BC exercise (Q2) to enhance our own BC exercising capability
- b. improving links between risk management and BC planning – in simple terms "risks + BC plans = indication of overall resilience"
- c. continuing to embed a "supported self-service" model in which teams and functions take ownership of their local BC arrangements, supported when necessary by ERM

### **Conclusion**

11. RoS Board to note the update.

**Head of Enterprise Risk Management  
Policy & Corporate Services  
21 May 2024**

Annex 1 - RoS Important Business Services



Ability to communicate with customers



Secure an Advance Notice



Search Primary Registers (LR, Sasines, and ROI)



Submit an application



Intake (put the application on the application record)

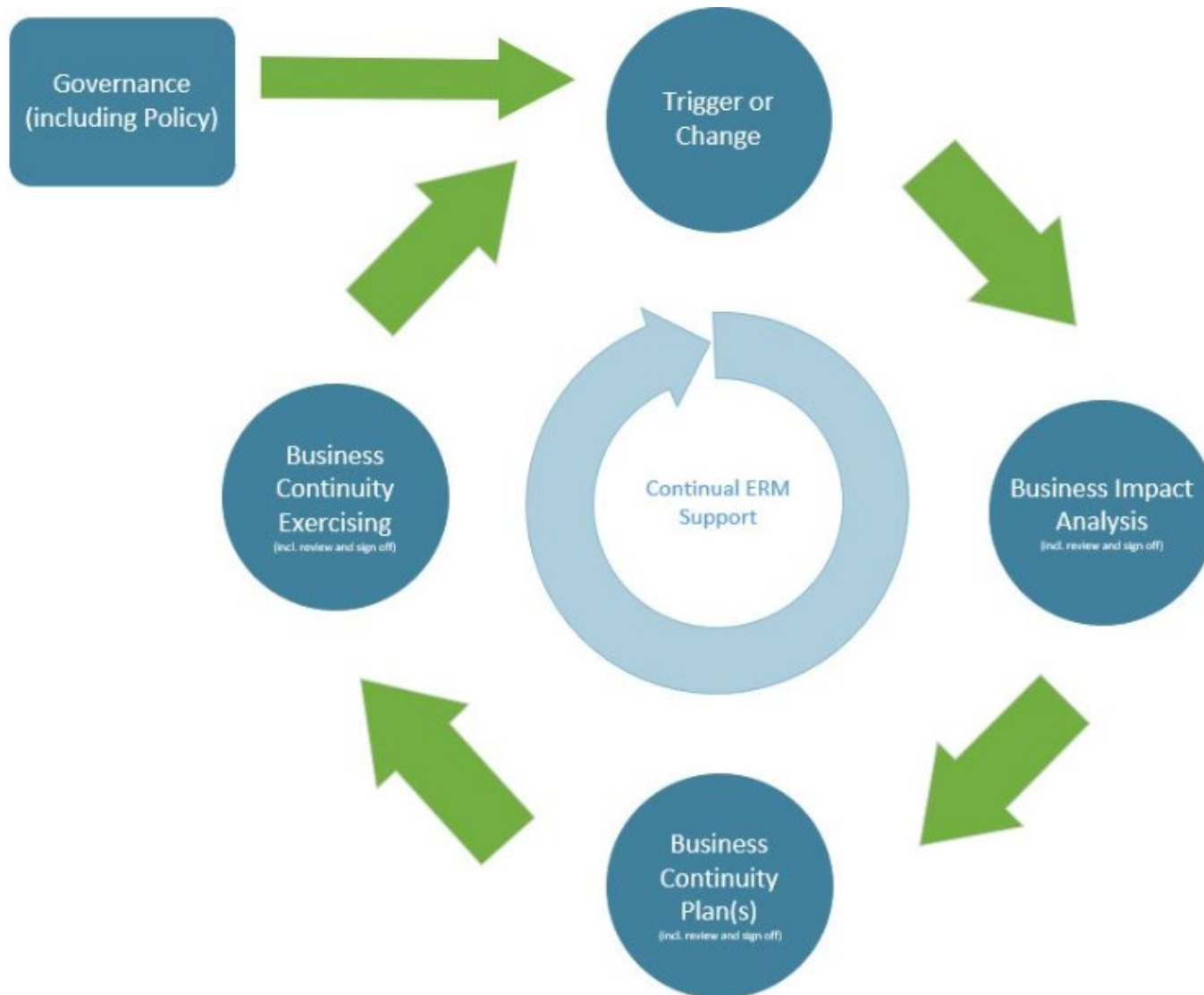


Plans Reports



**RoS' Important Business Services**

Annex 2 – Business Continuity Management System



Annex 3 – RoS Incident Management Criteria

Level	Description	Managed by	Criteria	Other actions/further information
P3/4	Minor incident	Estates/IT Incident Management Team	<ul style="list-style-type: none"> <li>▪ <b>Important Business Services may be affected (note 1)</b></li> <li>▪ Incident can be dealt with by local business area(s) affected</li> <li>▪ <b>Minor</b> disruption to business activities or impacts on customers or key stakeholders</li> <li>▪ Incident not expected to continue for more than <b>3 hours</b> or beyond the current day (dependent on when incident occurs)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Business continuity plans <b>not</b> invoked</li> <li>▪ IT Major Incident plan <b>may</b> be invoked</li> <li>▪ Estates/IT incident manager provides updates to IMT (and EMT as necessary)</li> <li>▪ <b>IMT informed</b> via Teams Incident Management channel with discretionary preparation for potential escalation to P2/P1</li> </ul>
P2	Major incident	Estates/IT Incident Management Team  Incident Management Team (IMT) (subset / all)	<ul style="list-style-type: none"> <li>▪ <b>Important Business Services affected</b></li> <li>▪ Incident cannot be dealt with by local business area(s) affected alone</li> <li>▪ <b>Major disruption</b> to business activities or impacts on customers or stakeholders</li> <li>▪ <b>Access to premises</b> denied for up to 24 hours for building essential services</li> <li>▪ Incident not expected to persist beyond <b>24 hours</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Business continuity plans <b>may be invoked</b> for <b>affected business areas</b></li> <li>▪ IT Major Incident plan invoked</li> <li>▪ Estates/IT incident manager calls a full IMT / subset of IMT and may request an IMT lead incident manager be appointed</li> <li>▪ Estates/IT incident manager continues to provide updates to IMT and EMT</li> <li>▪ If IMT lead incident manager appointed, co-ordinated Estates/IT/IMT updates provided to EMT</li> </ul>
P1	Exceptional incident	Estates/IT Incident Management Team  Incident Management Team (all)  Executive Management Team (EMT)	<ul style="list-style-type: none"> <li>▪ <b>Important Business Services affected</b></li> <li>▪ Incident requires an organisational response</li> <li>▪ <b>Exceptional disruption</b> to business activities or impacts on customers and stakeholders</li> <li>▪ Incident at RoS site that may have impact on local community</li> <li>▪ Widespread incident in area local to MBH or SVP</li> <li>▪ <b>Destructive loss</b> or partial <b>loss of premises and/or statutory data, business critical dependent systems (note 3)</b></li> <li>▪ Incident may attract media or Government attention</li> <li>▪ RoS may not be able to resolve the incident alone</li> <li>▪ Incident may persist for <b>more than one working day / 24 hours</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Business continuity plans <b>invoked</b></li> <li>▪ IT Major Incident plan invoked</li> <li>▪ Estates/IT incident manager calls a full IMT and requests an IMT lead incident manager be appointed</li> <li>▪ Co-ordinated Estates/IT/IMT updates provided to EMT</li> <li>▪ The Keeper calls <b>EMT</b> meeting</li> <li>▪ <b>Strategic direction</b> given by <b>EMT</b></li> <li>▪ Assistance may be sought from Government and/or stakeholders</li> </ul>

NOTE:

1. **Important Business Services**
  - a. Ability to communicate with our customers
  - b. Secure an advance notice
  - c. Search the primary registers (Land Register, Sasine Register, ROI)
  - d. Submit an application
  - e. Intake
  - f. Plans Reports
2. List of IMT members stored in the Emergency Contact List in SharePoint (link from IMT Teams channel and [here](#)) and Egress
3. Statutory data and business critical dependent systems are defined in Business Impact Analyses
4. When an incident involves any potential data/information breach (especially one involving personal information) the Data Protection Officer/Information Governance team shall be advised **immediately or as soon as practicable** (RoS must inform the ICO within 72 hours in this scenario)
5. In the event of a serious event threatening the safety of staff or customers, e.g., evacuation of premises, RoS Emergency Procedures will be followed
6. Incidents can escalate directly to any level if the impacts (size and likely duration) make it necessary

**Annex 4 – Business Continuity Plans directly supporting RoS Important Business Services**

Communicate with Customers	Secure an Advance Notice	Search Primary Registers	Submit an Application	Intake (application on app record)	Plans Reports
<ul style="list-style-type: none"><li>• Communications BCP</li><li>• Customer Experience BCP</li></ul>	<ul style="list-style-type: none"><li>• Service Stream BCPs</li><li>• <u>Sasines</u> BCP</li><li>• Customer Facing BCP</li></ul>	<ul style="list-style-type: none"><li>• Customer Experience BCP</li><li>• CAJR BCP</li><li>• Customer Facing Domain BCP</li><li>• Other Registers Domain BCP</li></ul>	<ul style="list-style-type: none"><li>• Customer Facing Domain BCP</li></ul>	<ul style="list-style-type: none"><li>• Service Stream BCPs</li><li>• Sasines BCP</li><li>• CAJR BCP</li><li>• LR Domain BCP</li><li>• Other Registers Domain BCP</li></ul>	<ul style="list-style-type: none"><li>• Plans Reports BCP</li><li>• Customer Facing Domain BCP</li></ul>