



Business Continuity Plan

Purpose

1. This Plan sets the Australian International Institute of Higher Education's ('the Institute') approach and guidance to business continuity management, i.e. preventing and mitigating the negative consequences any disruption to the Institute's operations may have on student educational outcomes and their experience at the Institute.
2. Effective implementation of this Plan will enable enhanced business resilience and safeguard the interests of students and other Institute stakeholders.
3. This Plan covers processes and systems focusing on business continuity and on returning to normal operations. It does not provide guidance for the management of impact of critical incidents on student wellbeing and safety or emergencies. For more information on processes for student wellbeing and safety, refer to the Institute's *Critical Incident and Emergency Management Policy and Procedure*, *Health and Safety Policy and Procedure*, and *Student Support Framework*.
4. In the unlikely event that the Institute is unable to deliver courses as expected, the Institute has teach-out and tuition assurance arrangements in place to mitigate disadvantage to enrolled students. For more information, refer to the Institute's *Course Discontinuation Policy and Procedure* and *Refund Policy and Procedure*.

Background

5. The Institute is committed to minimising any negative impact on student educational outcomes and their experience at the Institute due to disruption to the Institute's operations by managing risks associated with business disruption, system failures, and damages to facilities and equipment through the implementation of appropriate processes and systems for:
 - a) as far as possible, preventing the occurrence of disruptive incidents;
 - b) facilitating continued delivery of critical business activities;
 - c) mitigating the impact of disruptive incidents; and
 - d) facilitating return to normal operations.

Scope

6. This Policy and Procedure apply to:
 - a) all staff of the Institute whether full-time, part-time, casual or contract;
 - b) members of the Institute's governing bodies;
 - c) individuals engaged in providing services to the Institute, such as contractors or consultants.

Definitions

7. For the purposes of this Policy:
 - a) **Business continuity** is the capability of the Institute to continue delivery of services at



acceptable levels following disruptive incidents.

- b) **Business continuity management** is a management process that identifies potential threats to the Institute 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 stakeholders and its reputation.
- c) **Business continuity plan** is a set of documented procedures that guide the Institute to respond, recover, resume, and restore to a pre-defined level of operation following disruption, covering resources, services and activities required to ensure the continuity of critical business activities.
- d) **Business impact analysis** is the process of analysing activities and the effect that a business disruption might have upon them.
- e) **Critical business activities** are those activities essential to deliver outputs and achievement of business objectives.
- f) **Recovery time objective (RTO)** is the period of time following an incident within which services or specific business activities must be resumed and resources recovered.

Approach

- 8. The Institute adopts a risk-based approach to business continuity management, placing students' interests at the centre of its processes, and embedding business continuity requirements and processes in day-to-day activities. Business continuity management follows the same Plan – Do – Check – Act model as the Institute's Quality Assurance Framework.
- 9. The Governing Council is responsible for the sound and prudent management of the Institute's affairs, which it has delegated to the Chief Executive Officer (CEO), who is supported by the Executive Management Team. The CEO is responsible for coordinating the Institute's business continuity management activities according to the following stages:
 - a) planning;
 - b) preparedness;
 - c) response;
 - d) recovery;
 - e) monitoring; and
 - f) improvement.

Planning

- 10. The CEO will coordinate the planning stage of business continuity management and confirm that planning activities undertaken in consultation with business units demonstrate or include:
 - a) understanding of the context of the Institute;
 - b) understanding of the needs and interests of students, regulatory requirements, and stakeholders and community expectations;
 - c) delineation of the scope of business continuity management;
 - d) definition of organisational roles, responsibilities and authority for business continuity management;



- e) risk assessment;
 - f) identification of critical business activities;
 - g) business impact analysis (Appendix One);
 - h) strategies for the recovery of critical business activities;
 - i) determination of resource requirements; and
 - j) determination of required communication protocols in the event of a disruption.
11. The Institute's key risk assessments are contained in the AIIHE Risk Register and Risk Incident Register.
12. The CEO will maintain an understanding of current threats to business continuity in the sector and in the context of the Institute's operations. These include but are not limited to:
- a) IT system failures, malware, ransomware;
 - b) pandemics;
 - c) heat waves.

Preparedness

13. The CEO will confirm that the Institute is adequately prepared to respond and recover from business disruptions, including:
- a) demonstration of commitment from leadership and management with respect to business continuity management;
 - b) availability, competence, and adequacy of resources for the delivery of business continuity processes;
 - c) awareness of staff, students and other stakeholders of the Institute's business continuity arrangements;
 - d) regular exercise and testing of the Plan, including particular response and recovery plans; and
 - e) adequacy of suppliers' own business continuity arrangements.
14. Plans and schedules for preparedness are provided at Appendix 2.
15. Officers responsible for recovery plans must ensure readiness of their plans at all times and promptly report any issue to the CEO.
16. Testing of the Plan will ascertain that:
- a) critical business activities have been identified;
 - b) recovery plans are in place;
 - c) recovery strategies are appropriate;
 - d) documentation for the Plan is current;
 - e) recovery time objectives have been established; and
 - f) testing of the Plan has been completed during the previous two years and that recommendations arising from the post-implementation review have been implemented and are effective.

ICT systems preparedness

17. The availability and security of ICT systems are critical to the Institute's operations. The Institute



sets adequate requirements and implements effective arrangements for the availability of services and the security of the data hosted on its systems.

18. Assessments of threats and vulnerabilities of the Institute's ICT systems are conducted regularly by appropriately qualified personnel, based on a current understanding of known risks to higher education providers in Australia. Controls relating to ICT systems are implemented by Institute staff or required from students and third-party suppliers and include:
- a) awareness and training;
 - b) identity management and access control;
 - c) protective technologies;
 - d) prioritisation of recovery of critical ICT systems;
 - e) cloud security requirements;
 - f) data security measures;
 - g) back-up strategy and definition of required scope, frequency, methodology, location, and testing of back-ups;
 - h) ICT systems and network change management; and
 - i) detection of cyber events.

Response

19. The CEO will coordinate the Institute's response to a disruption, including:
- a) assessment of the disruption;
 - b) confirmation and communication of the activation by the Chief Executive Officer of the institutional response to a disruption;
 - c) coordination of the immediate response by the Institute for containing, controlling and minimising impact on critical business activities and other functions; and
 - d) coordination of communication with students, regulators, and other stakeholders.
20. Institutional response guidelines are provided at Appendix 3.
21. The CEO is responsible for all communications with regulators, other statutory agencies, and the media.
22. The Student Services Manager is responsible for communications with students.
23. The Student Services Manager will ensure, as far as possible, that students have continued access to adequate support services throughout the disruption.
24. Other communications, e.g. with suppliers, are handled in accordance with functional responsibilities or as indicated in recovery plans.

Recovery

25. The CEO will coordinate the Institute's recovery from a disruption, including:
- a) prioritisation of resources required for critical business activities;
 - b) assessing the Institute's financial situation;
 - c) determining short-term and medium-term cash requirements;
 - d) as required, temporary deactivation of other resources;



- e) adjustment of recovery plans to the circumstances;
- f) liaising with third parties for recovery, such as insurers;
- g) implementation and closure of plans; and
- h) communication with students, staff, and other stakeholders on recovery progress.

26. The Institute's recovery plans are provided at Appendix 4.

Monitoring

- 27. The CEO will coordinate the collection, analysis, and reporting of data on business continuity management, including response and recovery performance, and student experience.
- 28. The Institute uses the collected data to monitor trends and emerging issues.
- 29. The Institute will improve its processes for managing business disruptions based on the collected data.
- 30. The Institute will benchmark its performance against relevant sector data and will establish targets as appropriate.
- 31. The Governing Council receives a post-implementation review report for each activation of an institutional response under this Plan and an annual report on the adequacy and effectiveness of its business continuity management processes.

Improvement

- 32. The CEO will coordinate the Institute's processes for review and improvement following a disruption, including:
 - a) recording events throughout response and recovery stages;
 - b) conducting a post-implementation review;
 - c) analysing data on student and stakeholder experience of the disruption;
 - d) benchmarking response and recovery performance against relevant internal and external metrics; and
 - e) reporting to relevant governing bodies for review, corrective action, and improvement.

Reporting

- 33. The Institute is required to notify the Tertiary Education Quality and Standards Agency (TEQSA) if an event occurs or is likely to occur that will significantly affect the Institute's ability to meet the *Higher Education Standards Framework (Threshold Standards) 2015*. The notification will be given no later than 14 days after the day that the Institute would reasonably be expected to have become aware of the event.
- 34. In particular, the Institute will notify TEQSA of changes that may impact on its financial viability, such as events that may have a significant impact on its ability to continue operating, and of changes that may impact on students, such as critical incidents and other material breaches in safety.

Responsibilities

- 35. The Governing Council is responsible for overseeing the implementation of effective business continuity management processes.



36. The CEO is responsible for:

- a) implementing the Institute's business continuity management processes in accordance with this Plan;
- b) liaising with the Executive Management Team;
- c) activating the institutional response to a disruption;
- d) formally closing recovery plans and declaring the Institute's return to normal operations;
- e) reporting to the Governing Council on the implementation of the framework; and
- f) escalating any material issue or incident to the Governing Council in a timely manner.

37. The Student Services Manager is responsible for:

- a) all communications with students;
- b) as far as possible, maintaining adequate student support services in the event of a disruption to the Institute's operations; and
- c) facilitating access to these services.



Associated information

| | |
|--|--|
| Approving body | Governing Council |
| Date approved | 23 October 2020 |
| Date of effect | Commencement of operation |
| Next scheduled review | Two years from when policy commence |
| Policy owner | Chief Executive Officer |
| Policy contact | Chief Executive Officer |
| Related AIIHE Documents | <p><i>Campus Facilities and Security Policy and Procedure</i></p> <p><i>Compliance Policy and Procedure</i></p> <p><i>Course Discontinuation Policy and Procedure</i></p> <p><i>Critical Incident and Emergency Management Plan</i></p> <p><i>Financial Management Policy and Procedure</i></p> <p><i>Fraud Prevention Policy and Procedure</i></p> <p><i>Health and Safety Policy and Procedure</i></p> <p><i>ICT Management Plan</i></p> <p><i>Planning Framework</i></p> <p><i>Quality Assurance Framework</i></p> <p><i>Refund Policy and Procedure</i></p> <p><i>Risk Management Plan</i></p> <p><i>Student Support Framework</i></p> <p><i>Use of ICT Policy and Procedure</i></p> |
| Higher Education Standards Framework (Threshold Standards) 2015 (Cth) | Standard 6.2 |
| Other related external instruments/documents | <p>Good Practice Documents</p> <ul style="list-style-type: none"> • <i>TEQSA Guidance Note: Wellbeing and Safety</i> • <i>ISO 22301:2019 - Security and resilience — Business continuity management systems — Requirements</i> |

Document history

| Version | Author | Changes | Approval Date |
|---------|----------------|------------------|-----------------|
| 1.0 | Not applicable | Original version | 23 October 2020 |
| | | | |

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Appendix 1 – Business Impact Analysis

Current as at: 23/10/2020

Responsible Officer (Coordination): CEO

Prioritisation of business activities

| Function | Process | Priority |
|----------------------------------|---------------------------------------|----------|
| Human Resource Management | Hiring of staff | Medium |
| | Staff Development | Low |
| | Training | Low |
| | Payroll | High |
| | OH & S | Medium |
| Admissions | Issuance of Confirmation of Enrolment | High |
| | Student Grievance | Medium |
| | Enrolment | Critical |
| | Orientation | High |
| Academic Management | Course Review | Medium |
| | Subject Review | Medium |
| | Moderation | High |
| | Subject Selection | Critical |
| | Exam Preparation | Medium |
| | Timetabling | High |
| | At Risk Students | High |
| | Academic Management System | Critical |
| | Academic Staff Management | Medium |
| | Course delivery | Critical |



| Function | Process | Priority |
|---------------------------------------|--|----------|
| | | |
| Finance Management | Budgeting | High |
| | Payroll | High |
| | Reporting | High |
| | Cost Control | Low |
| | Accounts Payable | High |
| | Accounts Receivable | High |
| | Disbursements | High |
| | Fees and refunds | Critical |
| Facilities Management & IT | Infrastructure | High |
| | Premises | Critical |
| | Fixed Assets | High |
| | Systems Maintenance | High |
| Administration | Reception | High |
| | Filing | Medium |
| | Data Entry | Medium |
| Student Support Services | Counselling and other support services | Critical |
| | Study Skills | Critical |
| Library | Cataloguing | Medium |
| | Library System | Critical |



| Function | Process | Priority |
|--|---------------------|----------|
| Marketing | Agent management | Medium |
| | Career expos | Low |
| | Open Days | Medium |
| | PRISMS | Critical |
| Strategic Management & Planning | Succession Planning | Low |
| | Training | Low |
| | Business Plans | High |
| | Governance | High |
| | Compliance | High |
| | Articulations | Medium |

Impact analysis

| Function | Critical Business Activity | Impact | Maximum Allowable Downtime | Required Resources |
|------------------------|----------------------------------|---|--------------------------------------|-------------------------------|
| Student Administration | Admission application processing | Lower student numbers | 20 days (non-peak) 10 days (peak) | Website Application portal |
| Student Administration | Enrolment and fee payment | Decline in student intake Delayed revenue resulting in reduced cash flow | 20 days (non-peak) 10 days (peak) | Student Management System |
| Academic | Delivery of units | Decline in student intake Course discontinuation Cancellation of accreditation/registration | 10 days | Classrooms Lecturers |



| Function | Critical Business Activity | Impact | Maximum Allowable Downtime | Required Resources |
|------------------------|--|---|-------------------------------------|--|
| Academic | Provision of Learning Management System Provision of learning resources | Decline in student intake | 20 days | Learning Management System Learning resources Learning Support staff |
| Academic | Conducting assessments and examinations, including marking | Decline in student intake Cancellation of accreditation/registration | 10 days (non-peak) 5 days (peak) | Assessors Invigilators Examination hall Examination scripts |
| Student Administration | Recordkeeping of student progression and completion | Decline in student intake Cancellation of accreditation/registration | 10 days | Student Management System Staff for data entry |
| Student Services | Provision of student services, including support services | Decline in student intake Cancellation of accreditation/registration | 10 days | Student Services staff Learning support |



Appendix 2 – Preparedness

A. Business Continuity Distribution List

Current as at: 30/09/2020

List owner: CEO

Institute staff listed below are in possession of a hard copy of the latest version of the Business Continuity Plan.

| Copy Number | Role | Location |
|-------------|--------------------------|----------|
| 001 | Chief Executive Officer | TBA |
| 002 | Academic Dean | TBA |
| 003 | Student Services Manager | TBA |
| 004 | XX | TBA |
| 005 | | TBA |

B. Staff Training Schedule

Current as at: 30/09/2020

Responsible Officer: CEO

| Training | Frequency | Training Date | Staff | Outcome | Comments |
|------------------------------|-----------|---------------|---|---------|----------|
| Crisis Management | One-off | TBA | Chief Executive Officer | TBA | TBA |
| Business unit recovery plans | Annually | TBA | All staff required for critical business activities | TBA | TBA |



C. Exercise and Testing Schedule

Current as at: 30/09/2020

Responsible Officer: CEO

| Exercise / Test | Frequency | Date | Outcomes | Actions |
|---|-----------------|------|----------|---------|
| Major operational disruption | Every two years | TBA | TBA | TBA |
| Major operational disruption exercise (desktop) | Annually | TBA | TBA | TBA |
| ICT systems recovery | Annually | TBA | TBA | TBA |

D. Insurance

Current as at: 30/09/2020

Responsible Officer: External Accountant

| Insurance Type | Policy Coverage | Indemnity Period | Policy Exclusions | Expiry Date | Insurance Company Contact | Responsible Officer |
|-----------------------|-----------------|------------------|-------------------|-------------|---------------------------|---------------------|
| Business interruption | TBA | TBA | TBA | TBA | TBA | External Accountant |
| Property | TBA | TBA | TBA | TBA | TBA | External Accountant |
| Theft | TBA | TBA | TBA | TBA | TBA | External Accountant |



E. ICT Systems

Current as at: 30/09/2020

Responsible Officer (Coordination): CEO

| ICT System | Security | Data back-up | Agreement Expiry Date | Supplier contact | Responsible Officer |
|-------------------------------------|----------|--------------|-----------------------|------------------|-----------------------------------|
| Student Management System | TBA | TBA | TBA | TBA | Student Services Manager |
| Learning Management System | TBA | TBA | TBA | TBA | CEO |
| Website | TBA | TBA | TBA | TBA | Marketing and Recruitment Officer |
| Intranet | TBA | TBA | TBA | TBA | Student Services Manager |
| Personal and Shared drives | TBA | TBA | TBA | TBA | Student Services Manager |
| Applications and software | TBA | TBA | TBA | TBA | Student Services Manager |
| Accounting Management System | TBA | TBA | TBA | TBA | CEO |
| Library resources and subscriptions | TBA | TBA | TBA | TBA | Librarian |
| IT equipment | TBA | TBA | TBA | TBA | Student Services Manager |



Appendix 3 – Response

A. Immediate response

The following steps are provided as a guide only and may need to be adjusted depending on the circumstances.

| Phase | Responsibility | Action |
|---------------|------------------------------|--|
| Notification | CEO | <ul style="list-style-type: none">• Notify Executive Management Team (EMT) of disruption• Notify staff of disruption and advise that further information on the response will be provided |
| Recordkeeping | CEO | <ul style="list-style-type: none">• Populate the event log |
| Assessment | CEO | <ul style="list-style-type: none">• Determine impacted critical business activities• Determine required resources |
| | CEO | <ul style="list-style-type: none">• Determine appropriate institutional response |
| Activation | CEO | <ul style="list-style-type: none">• Active institutional response and appropriate recovery plans |
| Communication | CEO/Student Services Manager | <ul style="list-style-type: none">• Inform staff and students of the activation of the relevant plans and required actions• Inform stakeholders as required• Provide communication protocols to staff and students, i.e. who and when to contact Institute staff and when further information will be available. |
| Operations | CEO | <ul style="list-style-type: none">• Confirm availability and adequacy of alternate site, alternate systems, and other contingencies• Identify staff and resources for continuity of critical business activities at alternate site• Notify stakeholders (e.g. building management) of relocation of staff and students |



B. Contact lists

Current as at: 30/09/2020

Responsible: CEO

| Institute | Contact details |
|---|-----------------|
| Chief Executive Officer | TBA |
| Student Services Manager (International and Domestic Student point of contact) | TBA |

| Third parties | |
|---------------|-----|
| Insurer | TBA |
| ICT supplier | TBA |
| Bank | TBA |

C. Event log template

Responsible Officer: CEO

| Phase | Date/Time | Action / Decision / Event |
|-----------------------------|-----------|---------------------------|
| Incident | | |
| | | |
| | | |
| | | |
| | | |
| Return to normal operations | | |



Appendix 4 – Recovery

A. Recovery plans

Current as at: 30/09/2020

Responsible Officer (Coordination): CEO

| Critical Business Activity | Recovery Time Objective | Resources | Actions | Responsibility |
|----------------------------------|-------------------------|--|--|--|
| Admission application processing | < 5 days | Staff for processing applications Computers / laptops Mobile phones | <ul style="list-style-type: none">- Alternate site or working from home- Implement to paper-based system- Implement alternative ICT system | Student Services Manager |
| Enrolment and fee payment | < 5 days | Staff for processing enrolments and payments Computers / laptops Mobile phones | <ul style="list-style-type: none">- Alternate site or working from home- Implement to paper-based system- Implement alternative payment facility | Student Services Manager in consultation with CEO |
| Delivery of units | 5 days | Lecturers / teaching staff Laptops | <ul style="list-style-type: none">- Alternate teaching site- Group classes- Reschedule classes | CEO supported by Course Coordinator |



| Critical Business Activity | Recovery Time Objective | Resources | Actions | Responsibility |
|---|-------------------------|--|---|-------------------------------------|
| | | Projectors Learning Management System Videoconference and streaming software/application | <ul style="list-style-type: none">- Hold live and recorded classes using digital technology and Learning Management System- Hire casual teaching staff | |
| Provision of Learning Management System and learning resources | 10 days | Librarian / Learning support staff | <ul style="list-style-type: none">- Arrange for alternate subscriptions- Enter into agreement for utilisation of alternate adequate library- Implement alternate LMS- Implement face-to-face, email, or other online platform as temporary learning system- Purchase hard copies of required textbooks- Hold additional consultation hours | CEO supported by Librarian |
| Conducting assessments and examinations | 5 days | Assessors / Markers Scripts Examination hall or suitable venue | <ul style="list-style-type: none">- Hire casual assessors, markers or invigilators- Rent venue suitable for examination | CEO supported by Course Coordinator |



| Critical Business Activity | Recovery Time Objective | Resources | Actions | Responsibility |
|--|-------------------------|--|---|---|
| | | Videoconference software/application | <ul style="list-style-type: none">- Hold online examinations- Arrange for secure handling and printing of examination scripts at external location | |
| Recordkeeping of student progression and completion | 5 days | Staff for collecting and recording student information | <ul style="list-style-type: none">- Implement manual recordkeeping system- Arrange for alternate information systems | Student Services Manager with support of Student Administration Officer |
| Provision of student support services | 5 days | Staff for referring students to services | <ul style="list-style-type: none">- Arrange alternate support services with external providers | Student Services Manager |