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
    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.

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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 on 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

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

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    g)   business impact analysis (Appendix One)

    h)   strategies for the recovery of critical business activities

    i)   determination of resource requirements

    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

    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

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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

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

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

h) communication with students, staff, and other stakeholders on recovery progress.

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

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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

    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) 2021*. 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

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    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

    c) facilitating access to these services.

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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 commences
Current version approval date	30/09/2024
Next review date	30/09/2026
Policy owner	Chief Executive Officer
Policy contact	Chief Executive Officer
Related AIIHE Documents	Campus Facilities and Security Policy and Procedure Compliance Policy and Procedure Course Discontinuation Policy and Procedure Critical Incident and Emergency Management Plan Financial Management Policy and Procedure Fraud Prevention Policy and Procedure Health and Safety Policy and Procedure ICT Management Plan Planning Framework Quality Assurance Framework Refund Policy and Procedure Risk Management Plan Student Support Framework Use of ICT Policy and Procedure
Higher Education Standards Framework (Threshold Standards) 2021 (Cth)	Standard 6.2
Other related external instruments/documents	**Good Practice Documents** • TEQSA Guidance Note: Wellbeing and Safety • ISO 22301:2019 - Security and resilience — Business continuity management systems — Requirements

Document history

Version	Author	Changes	Approval Date
1.0	Not applicable	Original version	23 October 2020
1.1	Compliance Officer	Reviewed to align with the HESF 2021, responsibilities were clarified and strengthened, and the footer was updated with current addresses.	30 September 2024

N.B. The document is uncontrolled when printed! The current version of this document is maintained on the AIIHE website at www.aiihe.edu.au.

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Appendix 1 – Business Impact Analysis

Current as at: 30/09/2024

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
Finance Management	Budgeting	High
	Payroll	High
	Reporting	High
	Cost Control	Low
	Accounts Payable	High
	Accounts Receivable	High

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Function	Process	Priority
	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
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

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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
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

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Appendix 2 – Preparedness

A.   Business Continuity Distribution List

Current as at: 30/09/2024

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	On campus
002	Academic Dean	On campus
003	Student Services Manager	On campus

B.   Staff Training Schedule

Current as at: 30/09/2024

Responsible Officer: CEO

Training	Frequency	Staff	Outcome	Comments
Crisis Management	Annually	Chief Executive Officer	Regular	N/A
Business unit recovery plans	Annually	All staff required for critical business activities	Regular	N/A

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C. Exercise and Testing Schedule

Current as at: 30/09/2024

Responsible Officer: CEO

Exercise / Test	Frequency	Outcomes	Actions
Major operational disruption	Every two years	Regular	N/A
Major operational disruption exercise (desktop)	Annually	Regular	N/A
ICT systems recovery	Annually	Regular	N/A

D. Insurance

Current as at: 30/09/2024

Responsible Officer: External Accountant

Insurance Type	Policy Coverage	Indemnity Period	Policy Exclusions	Expiry Date	Insurance Company Contact	Responsible Officer
Business interruption	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	External Accountant
Property	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	External Accountant
Theft	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	Detail in the Insurance Register	External Accountant

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E. ICT Systems

Current as at: 30/09/2024

Responsible Officer (Coordination): CEO

ICT System	Security	Data back-up	Agreement Expiry Date	Supplier contact	Responsible Officer
Student Management System	(Password Protected)	Check with David	Contract (Vlad)	Websutra	Student Services Manager (David Mojarango)
Learning Management System	(Password Protected)	Check with David	Contract (Vlad)	Instructure	CEO
Website	(Password Protected)	Check with David	Contract (Vlad)	Hosting	Marketing and Recruitment Officer
Intranet	(Password Protected)	Check with David	Contract (Vlad)	Server	Student Services Manager
Personal and Shared drives	(Password Protected)	Check with David	Contract (Vlad)	Microsoft	Student Services Manager
Applications and software	(Password Protected)	Check with David	Contract (Vlad)	Various	Student Services Manager
Accounting Management System	(Password Protected)	Check with David	Contract (Vlad)	Internal	CEO
Library resources and subscriptions	(Password Protected)	Check with David	Contract (Vlad)	Various	Librarian
IT equipment	(Password Protected)	Check with David	Contract (Vlad)	Various	Student Services Manager

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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	• Notify the Executive Management Team (EMT) of the disruption • Notify staff of disruption and advise that further information on the response will be provided
Recordkeeping	CEO	• Populate the event log
Assessment	CEO	• Determine impacted critical business activities • Determine required resources
	CEO	• Determine appropriate institutional response
Activation	CEO	• Active institutional response and appropriate recovery plans
Communication	CEO/Student Services Manager	• 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	• Confirm availability and adequacy of alternate sites, 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

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B.   Contact lists

Current as at: 30/09/2024

Responsible: CEO

Institute	Contact details
Chief Executive Officer	vladica.belovukovic@aiihe.edu.au
Student Services Manager (International and Domestic Student point of contact)	studentservices@aiihe.edu.au

Third parties	
Insurer	vladica.belovukovic@aiihe.edu.au
ICT supplier	ict-support@aiihe.edu.au
Bank	vladica.belovukovic@aiihe.edu.au

C.   Event log template

Responsible Officer: CEO

Phase	Date/Time	Action / Decision / Event
Incident details	Internal document	Internal document
Resolution steps taken	Internal document	Internal document
Return to normal operations	Internal document	Internal document

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Appendix 4 – Recovery

A.   Recovery plans

Current as at: 30/09/2024

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	- 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	- 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 Projectors Learning Management System Videoconference and streaming software/application	- Alternate teaching site - Group classes - Reschedule classes - Hold live and recorded classes using digital technology and Learning Management System - Hire casual teaching staff	CEO supported by Course Coordinator
Provision of Learning Management System	10 days	Librarian / Learning support staff	- Arrange for alternate subscriptions	CEO supported by Librarian

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Critical Business Activity	Recovery Time Objective	Resources	Actions	Responsibility
and learning resources			- 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	
Conducting assessments and examinations	5 days	Assessors / Markers Scripts Examination hall or suitable venue Videoconference software/application	- Hire casual assessors, markers or invigilators - Rent venue suitable for examination - Hold online examinations - Arrange for secure handling and printing of examination scripts at external location	CEO supported by Course Coordinator
Recordkeeping of student progression and completion	5 days	Staff for collecting and recording student information	- 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	- Arrange alternate support services with external providers	Student Services Manager