

Business Continuity Institute. Australasian Chapter
DR 09053 CP Business continuity. Managing disruption related risk
Submission of Comments



Section 1 – Contact Details

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Section 2 – Draft Details and Comments

Committee No.:	OB-007	Draft No.:	DR 09053 CP, DR 09054 CP, DR 09055 CP
Subject Title:	Business continuity. Managing disruption related risk		
Project Manager:	Andrew McKay	Date of Comment:	21/9/2009

Page No.	Clause / Subclause No.	Para. / Fig. / Table No.	Comment	Proposed Change	Office Use Only	
					Name	Action on Submitted Comment
	DR 09053 CP DR 09054 CP DR 09055 CP		The Standard is written as if the reader is already well versed in the concepts and terms of business continuity management.	A more comprehensive and consistent Glossary of terms (e.g. the same glossary used in all three documents) will assist the more inexperienced reader.		
	DR 09053 CP DR 09054 CP DR 09055 CP		<p>The Standard frequently makes use of overly long sentences and complex and confusing language. For example. Pt 1 - 3.3.1. says</p> <p><i>“Where the existing risk management framework does not ensure appropriate understanding of BCMS concepts and organizational requirements the organization shall undertake the development of the context to inform the establishment of the BCMS framework. Particular attention should be given when defining the context to those internal and external factors (including organizational functions, resources and external dependencies) which are most critical to achieving the objectives.”</i></p> <p>By comparison, in Part 2, Section 8.1 the Standard states that BC Plans should pay attention to</p> <p><i>(a) Simplicity and clarity of the concepts and instructions.</i></p> <p><i>(b) Use of language and terminology appropriate to the audience and organization.</i></p>	<p>The standard should attempt to make use of plain English and avoid overly complex “business-speak”.</p> <p>The language can be simplified, and sentence / paragraph construction reviewed with a focus on ease of understanding for the reader.</p>		
	DR 09053 CP DR 09054 CP DR 09055 CP		The Standard does not provide and comment on, or guidance in relation to pandemic management or planning	Provide some commentary about how the Standard can address the specific risk associated with pandemic, and the requirements of pandemic planning		

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	DR 09053 CP DR 09054 CP DR 09055 CP		As an Australian / New Zealand, the draft Standard is widely seen as a successor to the previous handbook publications HB 221 and HB 292. However, these previous documents are not mentioned in the Standard.	The standard should make some reference, and ideally demonstrate how the new standard aligns with the preceding BCM handbooks issued by Standards Australia		
	DR 09053 CP DR 09054 CP DR 09055 CP		There is a significant amount of duplication of information between the three Part. It is uncertain whether the Standard is intended to be read and used as a single document, or if each Part is intended to be fully independent and operate as a stand alone document.	Clarify in the introduction sections whether or not the Standard is three separate and stand alone Parts that can be used separately. <i>If this is not the case, (if the three Parts are intended to be used together) then the amount of duplicate information should be reviewed with a clear focus on reducing the amount of duplication between the documents. It should be easy to add cross references between the documents, rather than repeating whole passages three times.</i>		
	DR 09053 CP DR 09054 CP DR 09055 CP		All three documents do not make clear enough distinction between the non-negotiable standard requirements (“the organisation shall”) and the optional items provided for “consideration” or other soften terms.	The three documents could be reformatted so the reader can clearly identify those items which are mandatory requirements from other optional “considerations”		
3	DR 09053 CP	Fig P1	It is unclear from the document what diagram Fig P1 represents, or how it is supposed to be interpreted.	Provide a brief description of the intended purpose of diagram Fig P1		
10 20	DR 09053 CP 10.3	Fig 1	Part 1 makes inconsistent reference to Exercising. Fig Shows Exercising as part of the “Check stage”. However, Section 10.3, Exercising, is described as part of Maintenance and Improvement, and aligns to the “Act” stage in the PDCA diagram. This causes unnecessary confusion	Avoid unnecessary confusion about the PDCA concepts, by aligning the Diagram (Fig 1) with the text in the document.		

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	DR 09053 CP 10.3 DR 09054 CP 9.2		<p>The language used in Parts 1 & 2 of the Standard is surprisingly “soft” in respect to BCP exercising or testing. Pt1, Section 10.3 states organisations should “consider” conducting exercising. This implies exercising / testing is optional, not a essential step in a complete BCP development programme.</p> <p>Part 2, Section 9.2 also understates the necessity of exercising / testing as a vital stage in an effective BCM programme.</p>	The Standard documents should be re-written to place strong and unambiguous emphasis on the importance of exercising / testing as an essential component of an effective BCM programme.		
8	DR 09054 CP 1.2.17		The Standard refers to “maximum tolerable period downtime”. This acronym is already defined in BS 25999 and in the ANAO’s revised Guide to BCM (June 2009) as “Maximum Tolerable Period of Disruption”. The Australian standard should avoid creating confusion by varying established terminology.	<p>Revise the Standard to define “MTPD” as “Maximum Tolerable Period of Disruption”.</p> <p>Consider including the full definition of MTPD as per BS 25999 Part 2.</p>		
11	DR 09054 CP	Fig 1	Many of the diagrams in the Standard are useful and help to clarify concepts and methods. However, several of the diagrams are not closely integrated with the accompanying text. There is often limited reference to a diagram in the text (often only a single mention). In Part 2, Figure 1 is not even mentioned in the text.	<p>There is an opportunity to make more effective use of the diagrams in the Standard, by adding more frequent links between the concepts in the body of the text, and the accompanying diagrams.</p> <p>At a minimum, every diagram should be referenced at least once in the text.</p>		
12	DR 09054 CP Section 2.2		<p>Under Principles of BCM, the Standard states that BCM “is an integral part of risk management”</p> <p>This can be interpreted to suggest that BCM is a subset of risk management, rather than a separate but related management activity that relies on the principles of risk management as a key input.</p>	Section 2.2 should be re-written, to acknowledge the benefits of an integrated but distinct relationship between business continuity management and risk management.		

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2 6 10	DR 09054 CP Preface Section 1.1 Section 1.5		Part 2 includes a least three separate definitions of Business Continuity Management. This is potentially confusing in a Standard that is aimed at clarifying understanding of Business Continuity Management. There is no definition for BCM in Section 1.2. Definitions	The Standard should have a single definition of Business Continuity Management, provided in the Definitions / Glossary section. Other references to BCM should be reworded so that they are not interpreted as an alternative definition.		
7	DR 09054 CP Section 1.2.5		The section for Business Continuity Program has been given the wrong acronym (BCM) not (BCP)	Remove the acronym altogether, as making use of BCP for Business Continuity Program will cause confusion with Business Continuity Plan.		
39	DR 09054 CP Section 12		Section 12 – Activation & Deployment located at the end of the Standard seems to be disconnected from the rest of the document. The section deals with incident management, so it is unclear why it has been isolated at the back of the document.	There is no reason for the concepts described under Activation & Deployment to be separated from the rest of the document. It would be more effective to add this section to section 7.6. Developing Incident Management Strategies (page 30)		
11	DR 09055 CP	4.2.2	The Assurance Standard describes the prioritisation of assurance activities may be based on ‘material control failure or weaknesses. However DR 09055 does not specify that controls should be recorded based on materiality. The Standard does not identify the process for BCM control breakdowns to be identified and reported?	The Standard should describe how materiality of controls is assessed and recorded.		