

# Business Continuity Plan

## 1. Introduction

The purpose of the Business Continuity Plan is to ensure the continuation of GHEA’s Higher Education operations during and following any critical incident that disrupts GHEA’s normal operational capability. These incidents include but are not limited to power outages, earthquakes, fires, floods, bombs, or other crises and issues. GHEA has developed this BCP as part of the overall risk management strategy. This Plan is about maintaining, resuming, and recovering GHEA’s operations as a higher educational provider. It considers both human factors and operational issues. The BCP was developed by a team of senior administrators and managers representing different departments within GHEA, including: Finance, Academic, Student Support Services, and IT. The Business Continuity Planning Team conducted a risk assessment and a business impact analysis under the guidance of the Risk Management Committee. The Team will continue to meet on a regular basis to flesh out details, test hypotheses and update the BCP.

The BCP is divided into five components:

- Business Impact Analysis;
- Risk Management and Transfer of Risk;
- Crisis Management Team;
- Crisis/incident Management;
- Immediate Response Strategies.

This Business Continuity Plan is to be reviewed annually by the Risk Management Committee as part of the Risk Management Policy review or following its use in a real or simulated incident/event.

## 2. Distribution list

The following positions are required to have the most updated hard copy of and be familiar with the Business Continuity Plan:

Copy Number	Position	Copy Number	Position
1	General Manager	4	Chair, RMC
2	Course Coordinator/Academic Director	5,6 & 7	Members of RMC
3	IT Manager		

### 3. Definitions

Term	Definitions
Activation	Process whereby all, or a portion of this Plan is put into effect.
Business Continuity Planning	A process that helps develop a planning document to manage the risks to GHEA, ensuring that it can operate to the extent required in the event of a crisis/disaster.
Business Continuity Plan	A document containing all the information required to ensure that GHEA can resume critical business activities should a crisis/disaster occur.
Business Impact Analysis	The process of gathering information to determine basic recovery requirements for GHEA’s key business activities in the event of a crisis/disaster.
Key business activities	Those activities essential to deliver teaching and learning services and the achievement of GHEA’s strategic objectives.
Disaster	A serious disruption in the community, caused by the impact of an event, that requires a significant coordinated response by governments and other entities to help the community recover from the disruption.
Emergency	An abnormal incident posing a threat to the safety of students, employees, the environment, facility or asset, which can be brought under control using the resources and procedures for emergency response that GHEA has in place.
Emergency Response	A procedure to effectively control any emergency whenever it may arise. The Plan describes the actions to be taken by GHEA personnel in the event of an emergency.

Procedure	
Emergency Services Agencies	Refers to the government and governing agencies that provide services covering all phases of emergency and disaster. management. It includes, but is not limited to, Police, Fire and Rescue, Ambulance, Emergency Management Agencies, Critical Management Team and the Australian Federal Police.
Next-of-kin	The person or persons formally nominated by a GHEA employee or student to be contacted in the case of that employee sustaining injury or loss of life.
Response Strategy	A strategy that outlines optimal strategic responses to the major threats to people, reputation, assets or earnings that might be faced by the Crisis Management Team.
Crisis Management Team	GHEA’s Crisis Management Team includes the General Manager and Academic Director.
Loss	The fact of loss of human, financial, resource or reputational to GHEA.
RTO	Recovery Time Objectives is the time from which GHEA declares a crisis/disaster to the time that the critical business function must be fully operational in order to avoid serious adverse impact on the GHEA’s operations and the financial loss.

#### 4. Business impact analysis

##### 4.1. Classification and assessment of crisis incident

GHEA defines the crisis classifications, definitions and reporting requirements as following:

Level	Description	Reporting requirements
1 – Insignificant	An insignificant incident is a minor incident which can be handle internally by GHEA personnel using standard procedures. It is not visible from external parties and can be dealt with by internal emergency services.	Normal line management reporting requirement.
2 - Minor	A minor incident is a minor incident which may require a report to outside agencies. A minor incident poses no threat to external threat and require no external assistance. The incident is under control but response by external personal may require.	Internal reporting.
3 - Moderate	A moderate incident is an incident which has potential to escalate to a serious crisis level. It affects the operation of GHEA. A moderate incident requires the assemble of the Crisis Management Team. The incident is not necessarily under control but poses no threat to external area. Response by external personnel may be required.	Crisis Management Team notification.

4 - Major	A major incident is a serious incident which involves fatality, serious injury, fire, explosion, natural occurrence or local incident that involves the assemble of the Crisis Management Team, internal and external emergency response. It may also be an order from TEQSA to audit or to investigate a major issue relating to GHEA’s Higher Education operation. Response by external personnel is required. The incident is not under control and poses threat to external area and seriously affect GHEA’s operation.	Crisis Management Team call-out
5 - Critical	A critical incident is a severe crisis such as multiple fatalities, serious injuries, large fires, bomb, or ethical and reputation damage. It may be any business or financial incident reflecting on GHEA’s reputation such as cease to provide course or cease to be a higher education provider. The incident is not under control and protection actions by external entities are required and ongoing.	Crisis Management Team call-out

#### 4.2. Business impact analysis

GHEA has identified the following areas as the critical business functions that must be recovered and continue in order to support the GHEA’s Higher Education operation:

Critical Business Activity	Description	Priority	Impact of loss	RTO (Recovery Time Objectives)
Employment services/Hiring	Employment of new employees, contract, induction	M	Unable to meet teaching and support service needs for the future classes.	4 weeks
Payroll	Process payment of wages, superannuation	M	Staff unhappy and may leave employment	4 weeks
General accounting	Process of bookkeeping	M	Delay in account payable, reporting	4 weeks
Academic lecturing and tutoring	Delivery of lecturing classes Provide academic tutoring supports.	H	Negative impact to student satisfaction Potential loss of students	2 weeks
Classroom technology supports	No access to projector, computer or internet inside classroom	H	Negative impact to student and teaching staff satisfaction	2 weeks
Student records and information system maintenance, transcripts	No access to student electronic records	M	Unable to retrieve student information, printing transcripts	4 weeks
Prospective student database/ admission services	No access to prospective student database, unable to issue new letter of offer, CoE	H	Loss of students	1 week
Classroom facility	No access to classroom	H	Cancellation of classes	2 weeks

Facilities operations	No access to library, student lounges or self-study area	M	Negative student satisfaction	3 weeks
Internet access	No access to internet within the campus	H	Disruptive to office, library	2 days
Network availability	No access to intranet	H	Disruptive to office and teaching staff	1 day

### 5. Risk management planning and transfer of risk

GHEA has identified the following risks that may affect the continuity of its Higher Education operation:

Key:

Priority: VH: Very High | H: High | M: Medium | L: Low

Likelihood: Rare: May occur only in exceptional circumstance

Unlikely: Could occur at some time

Possible: Might occur at some time

Likely: Will probably occur

Almost certain: Is expected to occur in most circumstance

Risk Description:	Likelihood	Impact	Priority	Preventative Action	Contingency Plans
Flash flood	Rare	Critical	H	<ul style="list-style-type: none"> <li>Ensure adequate insurance in place</li> <li>Off-site back up of database and resources</li> </ul>	<ul style="list-style-type: none"> <li>Immediate access to emails and database from the cloud</li> </ul>

Extreme weather	Rare	Critical	H	<ul style="list-style-type: none"> <li>• Ensure adequate insurance in place</li> <li>• Off-site back up of database and resources</li> </ul>	<ul style="list-style-type: none"> <li>• Immediate access to emails and database from the cloud</li> </ul>
Major fire/explosion	Unlikely	Critical	H	<ul style="list-style-type: none"> <li>• Ensure adequate insurance in place</li> <li>• Off-site back up of database and resources</li> <li>• Evacuation plan</li> <li>• Install alarm and video surveillance camera system</li> <li>• Source alternative delivery site (if location has been damaged)</li> </ul>	<ul style="list-style-type: none"> <li>• Immediate access to emails and database from the cloud</li> </ul>
Power failure	Possible	Moderate	H	<ul style="list-style-type: none"> <li>• Maintain a list of service providers</li> <li>• Undertake annual audit of loads and maintenance</li> <li>• Maintain power back up station</li> </ul>	<ul style="list-style-type: none"> <li>• Immediate activation of power back up station</li> </ul>
Database failure/ IT security breach	Possible	Major	H	<ul style="list-style-type: none"> <li>• Ensure adequate insurance in place</li> <li>• Off-site back up of database and resources</li> <li>• Ensure IT disaster recovery plan in place</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain a list of IT service providers for replacement/ recovery of database / hardware</li> <li>• Maintain a physical list of suppliers, students and other stakeholders</li> </ul>
Earthquake	Rare	Depends on the level	M-H	<ul style="list-style-type: none"> <li>• Ensure adequate insurance in place</li> <li>• Off-site back up of database and resources</li> <li>• Evacuation plan</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain physical paper resources whilst waiting for recovery arrangement</li> </ul>

Cease to provide course/ to be a Higher Education Provider	Unlikely	Critical	VH	<ul style="list-style-type: none"> <li>● Implementation of quality assurance policies and procedures</li> <li>● Implementation of annual audit</li> <li>● Maintain adequate insurance, including TAS and ASTAS</li> </ul>	<ul style="list-style-type: none"> <li>● Arrange alternative places for students</li> <li>● Tuition Assurance Scheme with ACPET</li> <li>● Invoke the Course Termination Policy and Procedure</li> </ul>
Adverse registration outcome	Unlikely	Critical	VH	<ul style="list-style-type: none"> <li>● Implementation of quality assurance policies and procedures</li> <li>● Implementation of annual audit</li> <li>● Maintain adequate insurance, including TAS and ASTAS</li> </ul>	<ul style="list-style-type: none"> <li>● Arrange alternative places for students</li> <li>● Invoke the Course Termination Policy and Procedure</li> </ul>

Under GHEA’s Risk Management Policy, GHEA has transferred part of the identified risks by maintaining an adequate level of insurance including:

- Public liability insurance
- Worker compensation insurance
- Professional indemnity insurance
- Business interruption insurance

In addition, GHEA is a member of the Tuition Protection Service (TPS) and the Australian Students Tuition Assistance Scheme (ASTAS). These are the mechanism to assist GHEA students to complete their study in the rare and unexpected cases that GHEA ceases to provide its courses to become a higher education provider.

Insurance type	Policy coverage	Policy exclusions	Insurance company and contact	Last review date	Payments due
SmartProtext Business	Theft/Glass Broad form liability	Money/Theft (no forcible entry) Flood	Arthur J. Gallagher (03) 9412 1555	18/02/2019	18/02/2020
Workers Compensation (GBCA)	Work Cover		Allianz (03) 9234 3285	16/08/2018	30/06/2019
Professional Indemnity insurance	Breach of professional duty		Gallagher	30/03/2019	30/03/2020
Dual Management Liability	Directors & Officers, company reimbursement, entity, employment practices, crime, tax audit		Gallagher	30/03/2019	30/03/2020
Tuition Protection Service (covers overseas students only)	tba	tba	ACPET	tba	tba

Australian Students Tuition Assistance Scheme (covers Australian students only)	tba	tba	ACPET	tba	tba
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## 6. Crisis Management Team

The role of the Crisis Management Team is to control and minimise loss related to an escalating critical incident or crisis. This will require the Crisis Management Team to make critical decisions to safeguard GHEA's interests and reputation and liaise with external stakeholder as required. The Crisis Management Team will be led by the General Manager and guided by the Board of Directors.

The main responsibility of the Crisis Management Team is to provide immediate solutions to the issue and to reduce its impact on GHEA's:

- facilities
- reputation
- students, staff, third parties, and
- earnings

The Crisis Management Team comprises of GHEA's executive management team including:

- Team leader: General Manager
- Member: Academic Director

The Crisis Management Team is assembled and manages the crisis under the direction of the General Manager. Additional resources may be required by the Team Leader (to be nominated by the General Manager) of the Crisis Management Team. Additional supports may be sought from internal or external sources which may include:

- Medical services
- Legal services
- IT services
- Occupational Health and Safety advisor
- Finance and Insurance consultant
- Media advisor

## **7. Crisis/incident management**

### **7.1. Notification of incidents or issues**

As soon as any GHEA staff member becomes aware of an emerging event/incident at the moderate level or above, such as occupational health and safety issues, they are to advise their direct supervisor. This is to be escalated as soon as possible to a member of the GHEA Standing Committee, who is to obtain all necessary details and then inform the Crisis Management Team Leader.

### **7.2. Assessment of incidents or issues**

The Crisis Management Team Leader is responsible for calling out the Crisis Management Team when appropriate. The situations that normally require a prompt decision include but are not limited to:

- A serious threat, or occurrence, of injury or death to any staff member, student, contractor, or member of the public.
- Major incidents which could affect operations (large-scale incidents, major asset damage, natural disasters, etc)
- Serious negative business occurrences
- Unscheduled TESQA audit.
- An escalating moderate event that has the potential to become major or critical
- An occurrence of any of the critical threats identified in this Plan.

### **7.3. Activation of the plan**

The Crisis Management Team Leader will implement the following steps:

Call together the members of the Crisis Management Team to develop a Crisis Management Plan as follows:

- Confirm the situation and analyse the facts;
- Identify objectives;
- Consider possible courses of action;
- Decide the most appropriate course of action, assign tasks and implement tasks;
- Ensure effective communication with stakeholders;
- Plan to resume normal operations.
- Contact any necessary additional resources.
- Report the situation to other members of the management team and key contacts.

### **7.4. The Crisis Management Team will assign spokesperson and agree on a communication message. The message must be clear, consistent and focus on facts rather than opinion or assumption. The message should include the following aspects of the situation:**

- The current situation

- The human concern
- The operational implications
- Details of the recovery plan
- Contact points

#### 7.5. Recovery and review

When the Crisis Management Team Leader is satisfied that the coordination response is no longer required, the Team Leader will:

- Make an official announcement to GHEA staff, students and key stakeholders.
- Outline the current state of business operations and the intent for the way forward.
- Develop a Business Recovery Plan and assign tasks to a Recovery Team. The Recovery Plan will cover but will not be limited to the following points:
  - Assessment of any remaining threats to: students, staff, assets, and earnings.
  - Recovery goals
  - Recovery strategies
  - Other issues for consideration include:
    - insurance coverage
    - legal advice
    - repair of damage
    - inquiries from statutory bodies, and
    - media management.

After the crisis event/incident is over, the Crisis Management Team will conduct a post-crisis evaluation review and develop a report. This report will be formally tabled at meetings of the Board of Directors and Academic Board. Depending on the nature of the crisis incident/event, the report will contain the followings:

- How did the crisis happen?
- How did the Crisis Management Team respond?
- Was the Crisis Management and Business Recovery Plans developed by the Crisis Management Team adequate?
- Were communications effectively managed?

- Were Crisis Management and Emergency Management Manuals adequate?
- Were external resources effective?
- Are staff/student counselling services ongoing?
- What lessons have been learnt?
- What can be done to avoid a similar situation arising in the future?
- Is an effective Business Recovery Plan in place (including a communication strategy)?
- Have all outside agencies and relevant advisors, insurers and risk managers been effectively notified?
- Has all Crisis Management and emergency equipment been re-audited and amended accordingly?

### 8. Immediate response strategies

When dealing with a crisis the Crisis Management Team may consider the following immediate response strategies:

Scenario	Immediate respond strategies
Natural disaster	Flooding or earthquake that affect the entire operations of GHEA. <ul style="list-style-type: none"> <li>○ Call 000 and external emergency services as required</li> <li>○ Activate the evacuation/emergency plan</li> <li>○ Take a roll call as soon as possible</li> <li>○ Ensure the security of assets (if practicable and safe to do so)</li> <li>○ Identify and inform next of kin of any victim</li> <li>○ Develop communication strategies</li> <li>○ Brief key stakeholders</li> <li>○ Liaise with authorities</li> <li>○ Consider insurance ramifications</li> </ul>
Serious injury/fatality	People killed/injured while participating in an activity associated with GHEA. <ul style="list-style-type: none"> <li>○ Activate the evacuation/emergency plan</li> </ul>

	<ul style="list-style-type: none"> <li>○ Call 000 and external emergency services as required</li> <li>○ Identify victims</li> <li>○ Identify next of kin and assist police to contact next of kin</li> <li>○ Liaise with external services to examine the cause of incident</li> <li>○ If incident is overseas, seek Australian consular support</li> <li>○ Develop communication strategy</li> <li>○ Brief key stakeholders</li> <li>○ Liaise with authorities</li> <li>○ Consider insurance ramifications</li> </ul>
Major fire/explosion	<p>Major fire/explosion that causes death or injury and damage to GHEA property.</p> <ul style="list-style-type: none"> <li>○ Activate the evacuation/emergency plan</li> <li>○ Call 000 and external emergency services as required</li> <li>○ If the incident involves serious injury or fatality, follow the response strategy above</li> <li>○ Develop human resource plan for any victim or next of kin <ul style="list-style-type: none"> <li>○ Identify victims</li> <li>○ Identify next of kin and assist police to contact next of kin</li> </ul> </li> <li>○ Liaise with external services to examine the cause of incident</li> <li>○ Develop communication strategy</li> <li>○ Brief key stakeholders</li> <li>○ Liaise with authorities</li> <li>○ Consider insurance ramifications</li> </ul>
Prolong loss of utility and or server/IT system	<p>Loss of power, computer links and facilities or serious corruption of database</p> <ul style="list-style-type: none"> <li>○ Determine the extent and duration of loss, effect on operations</li> <li>○ Implement the existing IT Disaster Recovery Plan</li> <li>○ Identify possible alternative sources</li> </ul>

	<ul style="list-style-type: none"> <li>○ Liaise with external services to examine the cause of incident</li> <li>○ Develop communication strategy</li> <li>○ Brief key stakeholders</li> <li>○ Liaise with authorities</li> <li>○ Consider insurance ramifications</li> <li>○ Work with the utility or IT to set short/long term recovery goal.</li> </ul>
GHEA ceases to provide a course or cease to be a higher education provider	<p>GHEA ceases to provide an existing course where students are currently enrolled.</p> <ul style="list-style-type: none"> <li>○ Call out the crisis management team</li> <li>○ Establish the best and worst scenario</li> <li>○ Brief key stakeholders</li> <li>○ Identify the affected students, courses, prepaid tuition fee and completed subjects</li> <li>○ Identify potential providers that can offer alternative places for students</li> <li>○ Discuss with potential providers</li> <li>○ Arrange alternative places for students with another provider</li> <li>○ Brief key stakeholders</li> <li>○ Prepare communication message</li> <li>○ Brief students and make necessity arrangements</li> <li>○ Inform TEQSA, TAS and ACPET to activate the tuition insurance schemes as required</li> </ul>
Adverse registration outcome	<p>GHEA receives an adverse registration outcome from TEQSA.</p> <ul style="list-style-type: none"> <li>○ Call out the crisis management team</li> <li>○ Establish the best and worst scenario and strategic direction</li> <li>○ Re-examine and re-affirm any practices/methodologies, standards, policies or communication flows under scrutiny</li> </ul>

	<ul style="list-style-type: none"><li>○ Seek advice from an authoritative, credible third party to form an independent inquiry to objectively examine all issues</li><li>○ Maintain organisational honesty and transparency by fully co-operating with any statutory, investigative or regulatory authorities</li><li>○ Consider use of an independent review panel to examine the current quality assurance standards and procedures</li><li>○ Brief key stakeholders including the Board of Directors</li><li>○ Prepare communication message</li><li>○ Seek and implement all necessary operational, administrative, technical, or scientific resolutions/actions</li><li>○ Consider all commercial, legal, risk management and insurance ramifications</li><li>○ Prepare briefing program for opinion leaders and key decision makers</li><li>○ Conduct review and include findings into quality standards, issues management and crisis management and recovery plans.</li></ul>
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<b>Policy &amp; Procedure Title:</b>	Business Continuity Plan	
<b>Version:</b>	1.0	
<b>Relevant Legislation/Act:</b>	Tertiary Education Quality and Standards Agency Act 2011	
<b>Relevant Standard:</b>	Higher Education Standards Framework (Threshold Standards) 2015, Section 6 & 7	
<b>Related Policies/Forms/Documents:</b>		
<b>Responsibility:</b>	Board of Directors	
<b>Approving Authority:</b>	Board of Directors	
<b>Date Approved:</b>	29/05/2019	
<b>Next Review Date:</b>	12 months from submission of TEQSA provider registration	
<b>Version Control</b>		
Version Number	Approval Date	Amendments

