

Industry Canada Business Continuity Plan Methodology Audit

October 4, 1999

Canada

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Executive Summary

Background

On March 1, 1999, Industry Canada's Year 2000 (Y2K) Project Office initiated a business impact analysis process to determine the departmental business functions requiring a Year 2000 Business Continuity Plan (BCP). A senior departmental committee was formed called the Y2K BCP Steering Group. It was co-chaired by the Corporate Secretary and the Associate Assistant Deputy Minister, Operations Sector. This business impact analysis process initially identified 59 critical functions that was subsequently reduced to 28 as approved by the Y2K BCP Steering Group.

On April 7, 1999, the co-chairs of the Y2K BCP Steering Group asked managers of the 28 critical business functions to each complete a BCP template by April 30, 1999 designed for this second phase of the BCP process. All 28 BCPs were fundamentally completed by May 30, 1999 except for the validation phase that includes modules on testing, training and plan maintenance. This validation phase is scheduled to be completed by October 15, 1999.

Audit Objectives

The objectives of the Audit and Evaluation Branch audit of the BCP methodology were to determine that the:

- process used to identify critical functions is reasonable;
- methodology and templates developed are effective;
- approach is comprehensive and does not include any gaps; and
- BCPs have been prepared by properly applying the methodology.

This report presents the findings of the audit of the first three objectives. The audit of the last objective will be conducted after October 15, 1999 when the validation phase has been completed.

Findings

The Y2K BCP Steering Group and the Y2K Project Office are commended for the process to identify critical functions and for the development of effective templates. The planning and conducting of training and information workshops to guide BCP managers during the validation phase of the BCP are also effective measures.

Objective 1: Determine that the process used to identify critical functions is reasonable.

Auditors found that the process used by Industry Canada to identify critical functions was reasonable. There are no recommendations.

Objective 2: Determine that the methodology and templates are effective.

There are two templates: the critical function template and BCP template. The findings regarding each follows.

Critical Function Template

Auditors found that the template used by Industry Canada to determine its critical functions was appropriate. There are no recommendations.

Business Continuity Plan (BCP) Template

The BCP template used by Industry Canada meets requirements and includes essential information needed to build an effective business continuity plan.

Two observations and their related recommendation resulted from the audit of this template.

The Year 2000 BCP Steering Group should ensure that the 28 critical function managers know how to react and understand the reporting and escalation procedures should a Y2K crisis arise (*refer to recommendation #1*).

It is our understanding that this escalation process will be contained in the validation phase of the BCP process. When auditing the completed BCPs in October, 1999, we will include an assessment of the escalation process planned (*refer to section 2.2.2*).

Since critical business function managers are accountable for the maintenance and implementation of their plans, it is recommended that the Year 2000 Project Office continue to remind BCP managers regularly to report to the Y2K Project Office the current status of their critical suppliers and dependencies. The Y2K Project Office sent an e-mail to BCP managers on September 16, 1999 concerning this follow-up with critical suppliers and dependencies (*refer to recommendation #2 and section 2.2.2*).

Objective 3: Determine that the approach is comprehensive and does not contain any gaps.

When comparing best practice and Y2K resource information with the work planned at Industry Canada, auditors found three significant issues that did not appear to be fully covered at the time of this audit. These issues are described below.

It is recommended that the BCP Steering Group plan, document and test a Y2K 'command centre' BCP that would serve as a centre for BCP critical managers to contact should a crisis arise as the date rollover period approaches. This 'command centre' could serve to monitor the activities during this period. Best practices indicate that a BCP devoted to a 'command centre' will minimize the risk during the rollover period (*refer to recommendation #3 and section 2.3.1*).

Secondly, the BCP Steering Group should evaluate whether to clarify, document and consolidate human resource, communications, decision-making and zero-day policies and procedures in one document and then distribute these to BCP and senior managers. This document could serve as a guide, responsibility and accountability resource. It should be continually updated and maintained (*refer to recommendation #4 and section 2.3.2*).

Thirdly, Y2K resource information indicate that during the rollover period, there may be increased incidences of hackers attempting to infiltrate particularly vulnerable mission-critical information systems and introduce new viruses to exploit any system vulnerability. Since Industry Canada is heavily dependent on several key systems, it is recommended that the department review security measures to assess how the department can minimize the risk of these vulnerabilities (*refer to recommendation #5 and section 2.3.3*). The Chief Information Officer has already begun planning for these possible hacking and virus intrusions.

Y2K BCP Steering Group Response to Audit Recommendations

During the October 1, 1999 Y2K BCP Steering Group meeting, the findings and recommendations of this audit report were presented.

The Y2K BCP Steering Group agreed to recommendation 1 (re the 28 critical function managers knowing how to react and understand the reporting and escalation procedures); recommendation 2 (re BCP managers to monitor regularly the status of their suppliers and dependencies); and recommendation 3 (re planning, documenting and testing a Y2K 'command centre' BCP).

With regard to recommendation 4 (re the evaluation of whether to clarify, document and consolidate human resources, communications, decision-making and zero-day policies and procedures in one document), the Y2K BCP Steering Group agreed to review similar policies from other entities and then decide on the necessity of this document.

Chief Information Officer

As for recommendation 5 (re the assessment of the risk of hacking and virus intrusions), this recommendation will be communicated to the Chief Information Officer. As indicated in the report, The Chief Information Officer has already begun the planning to protect the department regarding this risk.

1.0 INTRODUCTION

1.1 Background

On March 1, 1999, Industry Canada's Y2K Project Office initiated a business impact analysis process to determine the departmental business functions requiring a Y2K BCP. A senior departmental committee was formed called the Y2K BCP Steering Group. It was co-chaired by the Corporate Secretary and the Associate Assistant Deputy Minister, Operations Sector.

In early March, 1999, all business units in the Department were required to complete a uniform template asking them to assess their critical functions. The questionnaire was delivered to members of the Departmental Management Board under cover of the co-chairs of the Y2K BCP Steering Group.

Fifty-nine critical functions were originally identified at the business unit level. As questionnaires were signed-off and submitted to the Y2K Project Office, these were reviewed and feedback was given to managers to help determine their criticality. The Y2K BCP Steering Group approved a final list of 28 critical functions.

On April 7, 1999, the co-chairs of the BCP Steering Group asked managers of the 28 critical business functions to prepare a BCP using a second template consisting of two parts: Section One, covering the minimal acceptable levels of service, was completed by April 15; and sections two through six, including the identification of dependencies, assessment of risks, etc., were finished by April 30. On May 30, all 28 BCPs were complete pending the validation phase which includes modules on testing, training and plan maintenance. The validation phase is to conclude by October 15, 1999.

1.2 Objectives

The objectives of this Audit and Evaluation Branch audit of the BCP methodology were to determine that the:

- process used to identify critical functions is reasonable;
- methodology and templates developed are effective;
- approach is comprehensive and does not include any gaps; and
- BCPs have been prepared by properly applying the methodology.

This report presents the findings of the audit of the first three objectives. The audit of the last objective will be conducted after October 15, 1999 when the validation phase has been completed.

1.3 Approach

Data for the project was gathered by interviewing key people, reviewing relevant documents and researching best practices resources. The details are as follows:

- ▶ Interviews with key individuals including the:
 - Project Office staff
 - Staff responsible for the development of the templates under review
 - Former members of the Y2K BCP Steering Group
- ▶ Key documents were reviewed to understand Industry Canada's approach to BCP development and to document best practices. These documents included the:
 - critical function template
 - business continuity plan template
 - relevant e-mails
 - file material from the critical function selection process
 - Industry Canada's Business Continuity Plan
 - National Contingency Planning Group's BCP templates and recommended approaches to creating BCPs
 - other contingency planning methodologies and accompanying templates.
 - work deliverables generated in engagements with both private and public sector clients.
- ▶ Tables were used to compare generally accepted Y2K best practices to the processes and methodology used by the department. Each table contains generally accepted Y2K best practices for the business impact analysis and BCP phases of a Y2K project in a complex organization.

The following explains the purpose of each column shown in the tables:

- 'Best Practices' is a description of generally accepted Y2K best practices
- 'Industry Canada' indicates whether the department conformed to best practices
- 'Comments' describes the nature of the issues being addressed. The italicized text in the comments section indicates where the department deviated from best practices.
- 'Criticality' rates the criticality of areas where the department deviated from best practices.

Any significant gaps from best practices are in this report's recommendations. The tables show less significant issues such as:

- '*Low*' - This is where Industry Canada has deviated from best practices, but the impact to the organization is low and non critical to the progress of the project
- '*No action required*' - This refers to areas where Industry Canada's approach is consistent with generally accepted best practices.

1.4 Report Organization

The findings are presented by the three audit objectives (refer to 1.2).

2.0 FINDINGS

2.1 Objective 1: Determine that the process used to identify critical functions is reasonable.

Auditor found that the process used by Industry Canada to identify critical functions was reasonable.

This process was strengthened by:

- senior management approving and accepting accountability for the identification of the 28 critical functions; and
- critical function managers being encouraged to work with the Project Office and the Y2K BCP Steering Group to ensure the correct identification of the functions.

As outlined in Table A, Appendix A, there are no recommendations since any deviation from best practices is minor.

2.2 Objective 2: Determine that the methodology and templates are effective.

2.2.1 Critical Function Template

Auditors found that the template used by Industry Canada to determine its critical functions was appropriate. There are no recommendations.

The template was sufficient to help business managers isolate and define the criticality of their business functions and enabled the Y2K BCP Steering Group to review, assess and select the critical functions.

As outlined in Table B, Appendix B, there are no recommendations since any deviation from best practices is minor.

2.2.2 Business Continuity Plan (BCP) Template

This review found that the BCP template used by Industry Canada meets requirements and includes essential information needed to build effective business continuity plans.

As outlined in Table C, Appendix C, two observations and their related recommendation resulted from the audit of this template.

Observations

In sections 3.6 and 4.3, the BCP template requires a description of the procedures to follow to activate the BCP, but it does not indicate to whom the BCP manager must report should there be a crisis. The BCP template makes no provision for a business unit to document and report upon the impact a Y2K crisis may have on its operations.

Secondly, Y2K BCP monitoring is more significant than the traditional BCPs because of the demands and timing of Y2K. Best practices require continuous monitoring of risks like the status of key dependencies and suppliers. The BCP template does not clearly document BCP monitoring and detection strategies. Typically, the following issues should be considered such as the:

- frequency and type of monitoring
- roles and responsibilities as well as the names of the person responsible to monitor and their alternate
- reporting requirements (to log whether escalation required, status, action taken and date and time resolved)

Recommendations

Reporting and Escalation Procedures

1. The Year 2000 BCP Steering Group should ensure that the 28 critical function managers know how to react and understand the reporting and escalation procedures should a Y2K crisis arise.

It is our understanding that this escalation process will be contained in the validation phase of the BCP process. When auditing the completed BCPs in October, 1999, we will include an assessment of the escalation process planned.

Monitoring of Critical Suppliers and Dependencies

2. Since critical business function managers are accountable for the maintenance and implementation of their plans, it is recommended that the Year 2000 Project Office continue to remind BCP managers regularly to report to the Y2K Project Office the current status of their critical suppliers and dependencies. The Y2K Project Office sent an e-mail to BCP managers on September 16, 1999 concerning this follow-up with critical suppliers and dependencies.

- 2.3 **Objective 3: Determine that the approach is comprehensive and does not contain any gaps.**

Auditors found that when comparing best practice and Y2K resource information with the work planned at Industry Canada, three significant issues were found that did not appear to be fully covered at the time of this audit. These issues are described below.

Observations

The issues that do not appear to be fully covered are significant to support the development and management of individual BCPs. In their absence, developing effective BCPs is more difficult. These issues have not been audited in detail, as they are not within the scope of this audit, but will form part of the audit of the BCP samples planned in late October, 1999. We include these issues in this report to allow sufficient time for action.

2.3.1 The 'Command Centre' Strategy is not documented

Of the 28 BCPs being prepared, there is not one devoted to a 'command centre'. During this audit, we did not observe any plans for a 'command centre' BCP per best practices. A 'command centre' is a coordination centre and focal point for Y2K activities over the date rollover period, for example, from December 31 to January 4. It is a centre for Y2K information to be collected, documented, analysed and disseminated as well as a support centre in a crisis situation. The 'command centre' can distribute Y2K information on a timely basis to business units, decision-makers, external parties and business partners.

The 'command centre' BCP would include the following:

- a clearly defined purpose and mandate
- decision-making processes and procedures
- staff roles and responsibilities
- an activation schedule
- crisis monitoring requirements
- escalation procedures and delegations of authority
- operating site requirements
- resource requirements
- training and testing requirements
- internal and external communications procedures

During the audit, we noted that the department was planning to include the 'command centre' mandate as part of one of the critical functions, that is, 'Decision-Making Infrastructure to Minister/Deputy Minister'. At the time of the audit, the initial planning for this BCP did not appear to cover the 'command centre' requirements. We will audit this BCP in October to evaluate whether it covers sufficient planning and testing to cover the mandate of a 'command centre' to minimize risk.

The department's submission to the National Contingency Planning Group describes a governance and decision-making model for handling a Y2K crisis, but this is not detailed sufficiently to guide BCP managers or decision-makers in time of need. It contains no clearly defined process for managing potential problems.

If the department proceeds with this model, it will require its own set of detailed procedures, staff, and supplies. Completing the same BCP template as other business units will not be sufficient. In addition, planned crisis management and communications procedures developed need to be tested and evaluated as any other BCP.

Without a 'command centre' mandate BCP, the department is at higher risk.

Recommendation

3. It is recommended that the BCP Steering Group plan, document and test a Y2K 'command centre' BCP that would serve as a centre for BCP critical managers to contact should a crisis arise as the date rollover period approaches. This 'command centre' could serve to monitor the activities during this period. Best practices indicate that a BCP devoted to a 'command centre' will minimize the risk during the rollover period.

2.3.2 Year 2000 Policy Framework - Human Resources, Communication, etc.

To date, the development of BCPs is occurring without a complete departmental Y2K policy framework as a guide. The nature of Y2K planning compels organizations to identify issues falling outside normal operating and management procedures.

This includes policies covering:

- human resources for such situations as staff working over holidays, longer hours and requiring extended family-related leave requests to look after children due to school closings in the first two weeks of January;
- corporate internal and external communications; and
- defined critical departmental dates such as when the department will enter a period of "heightened" Y2K monitoring.

The Year 2000 Project Office prepared a "Year 2000 Compliance Kit" contains many important project guidelines, reporting structures and accountabilities but does not cover issues such as human resources, communications, decision-making and zero-day policies and procedures.

Recommendation

4. BCP Steering Group should evaluate whether to clarify, document and consolidate human resources, communications, decision-making and zero-day policies and procedures in one document and then distribute these to BCP and senior managers. This document could serve as a guide, responsibility and accountability resource. It should be continually updated and maintained.

2.3.3 Security

Experts knowledgeable about developments regarding Y2K indicate that there is a significantly higher risk of hackers attempting to infiltrate potentially vulnerable mission-critical information systems. It is also believed that new viruses may be introduced to exploit possible system vulnerability.

Recommendation

5. Since Industry Canada is heavily dependent on several key systems, it is recommended that the department review security measures to assess how the department can minimize the risk of these vulnerabilities. The Chief Information Officer has already begun planning for these possible hacking and virus intrusions.

Table A

**Industry Canada Critical Business Function Selection Process
Comparison to Best Practices**

Best Practice	Industry Canada	Comments	Criticality
1. The identified key functions are prioritized. This may include the use of formal analytical tools like a risk/likelihood matrix.	Yes	<ul style="list-style-type: none"> • The critical functions were filtered using an iterative process. • The Project Office provided a quality control and coordinating function, working with business units to help them determine whether their business function warranted a BCP. • If the business function was not considered critical, there were opportunities for business function "owners" to challenge this assessment before the BCP Steering Committee • <i>There were no clearly defined criteria for selecting the critical functions. No analytical or scoring techniques were used to rank or rate functions.</i> 	Low
2. Document rationale for selecting the key business functions. Rationales can include: all key functions with a loss impact rating of medium or high, outcomes of algorithms or scoring sheets, etc.	No	<ul style="list-style-type: none"> • The selection process occurred in an environment exemplified by formal discussion at the senior management level. There was also formal discussion between the Project Office and business units. • <i>The rationale for selecting critical functions was not formally documented or well publicized, although it was implicit in the approach taken by the Steering Committee and Project Office.</i> 	Low
3. Key functions deemed to require contingency plans reviewed and approved by senior management.	Yes	<ul style="list-style-type: none"> • Clear accountabilities and significant senior management participation and involvement ensured the selection of critical business functions. 	No action required

Table B

Industry Canada Critical Function Template Comparison to Best Practices

Critical Function Template			
Best Practice	Industry Canada	Comments	Criticality
1. All departmental business units are required to inventory their key functions and services using a consistent template and approach.	Yes	<ul style="list-style-type: none"> A questionnaire was delivered to all members of the Departmental Management Board, covering all management units within the department. Critical functions were identified, ranked and signed-off by a DMB member. Industry Canada also wanted a preliminary understanding of the human resource requirements needed to ensure a minimum level of delivery of the department's critical business functions. 	No action required
2. Business units received guidance on how to define a key function.	Yes	<ul style="list-style-type: none"> A critical function was defined as "functions that could not be interrupted without material consequences for the department, its clients, its partners and/or the Canadian public." Specific guidance was provided that these critical functions "could not be interrupted for even a short period of time without material impact." Functions were also defined as being either Program or Support functions. 	No action required
3. Business Units describe their key business functions (e.g., through narrative descriptions or process flows) to convey full extent of the function being described.	No	<ul style="list-style-type: none"> The questionnaire did not require business units to describe the nature of the critical function nor prepare process flows or quantify expected business volumes to determine nature and degree of Y2K risk. Respondents were required to name the critical function. The questionnaire did contain room for additional information, which may have been used to describe the critical function. 	Low
4. Business units assign a loss impact rating for each key function (High, Medium or Low) using a consistent rating approach.	Yes	<ul style="list-style-type: none"> An impact rating was assigned to each critical function using four impact types: Impact on Canadian Citizens, Impact General, Impact on Obligations, Impact on Employees. These impact types were defined, as was how they should be rated (using a consistent rating system.) The impacts were to be described, financial impacts estimated and the criticality of outage times rated. 	No action required
5. Business units identify the internal and external dependencies (processes, functions and services) required to sustain each key function	Yes	<ul style="list-style-type: none"> The questionnaire required respondents to list internal and external dependencies, both IT and non-IT. 	No action required
6. The nature of these dependencies are defined and described.	No	<ul style="list-style-type: none"> The template did not require business units to describe and detail the nature of the relationship a business function had with each dependency. Dependencies were listed, but the scope and nature of the relationship seemed not to be a requirement to complete the template. 	Low
7. Each dependency defined above is ranked for criticality, using consistent rating criteria.	No	<ul style="list-style-type: none"> The template did not require business units to rank dependencies. A common practice in year 2000 BCP preparation is for business units to rank the criticality of each dependency. Ranking dependencies allows business units to assess more accurately the extent of the Y2K dependency risk facing a critical business function. As well, it allows for the cross referencing of dependencies to ensure that there is consistency across business units. 	Low
8. Each key function is assigned a manager responsible or key function "owner" who signed-off on the completed key function analysis	Yes	<ul style="list-style-type: none"> Each critical function has an accountable function "owner" and a designated alternate. Moreover, the BCP submitted to the National Contingency Planning Group stipulates that "the accountability for the continuity of the critical business functions rests with the individual Departmental Management Board members." 	No action required
9. Each key function is assessed for its exposure to Year 2000 risk. The assessment is assisted by the use of a consistent template to help business units assess and grade risk levels.	No	<ul style="list-style-type: none"> The template did not require business units to outline the nature of the Y2K risk facing their business function. In the absence of such an analysis, it is difficult to ascertain the degree to which a critical function is "at risk." It is important to note that the BCP template, which followed the completion of this template, provides for a more robust risk analysis. 	Low

Table C

**Industry Canada Business Continuity Plan Template
Comparison to Best Practices**

Industry Canada BCP Template			
Best Practice	Industry Canada	Comments	Criticality
1. The template requires that detailed contingency/business resumption plans are prepared for each approved critical function using a consistent template and approach.	Yes	<ul style="list-style-type: none"> • A BCP is required for each critical function approved by the BCP Steering Group and the Departmental Management Board. 	No action required
2. If not already identified in the process to select the critical business functions, potential Y2K risks impacting on the critical function should be listed and ranked.	Yes	<ul style="list-style-type: none"> • In section 1.5 of the template, each BCP is required to contain a risk assessment. The assessment is based on an inventory of the business function's critical assets and dependencies 	No action required
3. The template should require a detailed description of the proposed contingency and business resumption workaround procedures.	Yes	<ul style="list-style-type: none"> • In sections 3.0 and 4.0, the template provides for a description of contingency and business resumption planning procedures. 	No action required
4. The workaround solutions require clearly defined criteria for when they will be activated and deactivated	Yes	<ul style="list-style-type: none"> • The template asks the critical function "owners" to self-define the "Minimum Acceptable Level of Service" below which they will activate their contingency plan during the date rollover period (defined more specifically as January 1st, 4th, 6th and 10th). Defining this level of service represented a formal deliverable from the critical function owner. • In sections 3.4, 3.5, 4.2 of the template respondents are required to identify the criteria for invoking both the contingency and business resumption plans and the procedures to follow once a plan is activated. 	No action required
5. The template compels respondents to outline clearly the plan's escalation and reporting procedures: <ul style="list-style-type: none"> • What are the notification procedures and reporting requirements if a Y2K event affects operations? 	No	<ul style="list-style-type: none"> • In sections 3.6 and 4.3, the template requires a description of the procedures to follow to activate the contingency or business resumption plan. • While each BCP must document these procedures, it is unclear what additional procedures are required to communicate a Y2K crisis beyond the management team responsible for the critical function. The implication is that the normal reporting relationships will remain in place. • The BCP template makes no provision for a business unit to document and report upon the impact a Y2K crisis may have on its operations. 	See Recommendation One

Industry Canada BCP Template			
Best Practice	Industry Canada	Comments	Criticality
6. The template requires business units to outline anticipated resources requirements for both business resumption and contingency planning.	Yes	<ul style="list-style-type: none"> In sections 3.8 and 3.9 of the template, business units are required to outline special equipment, technical, HR requirements. Appendices to the BCP template provide areas for business units to list these requirements. A checklist in section 2.0 commits BCP "owners" to maintaining up-to-date BCP requirements. The appendices are to remain with the business units and there is no provision for this information to be housed with any coordinating body who may be responsible for reporting and briefing senior management. 	No action required
7. Each BCP is required to contain a clearly defined contingency response team, including: <ul style="list-style-type: none"> Primary Y2K Team Leader Alternate(s) to Team Leader Team members Alternate(s) to team members Office, home and cellular numbers Detailed roles and responsibilities 	Yes	<ul style="list-style-type: none"> Each BCP identifies a responsible manager and alternate. In section 3.3 respondents are required to identify personnel responsible for delivering the critical business function. Roles and responsibilities are defined. In section 2.3 (including several appendices) the BCP includes staff contact lists and staff work schedules from December 29 to January 14. The BCP incorporates the requirement that temporary designations might be needed to ensure continuity of decision-making during the key Y2K periods. 	No action required
8. Each BCP is required to outline internal dependencies: <ul style="list-style-type: none"> Name of internal dependency provider Internal dependency description Business Unit requirements from internal dependency Internal dependency contact numbers 	Yes	<ul style="list-style-type: none"> In sections 1.3 and 1.4, BCP template requires respondents to identify internal dependencies and the critical assets which support the delivery of the business function. <i>It is unclear whether the contact information for the dependencies is to be collected and retained by the business unit.</i> 	Low
9. Each BCP is required to outline external dependencies: <ul style="list-style-type: none"> Name of external dependency provider External dependency description Back-up (B?) requirements from external dependency External dependency contact numbers 	Yes	<ul style="list-style-type: none"> In sections 1.3 and 1.4, BCP template requires respondents to identify external dependencies and the critical assets which support the delivery of the business function. <i>It is unclear whether the contact information for the dependencies is to be collected and retained by the business unit.</i> 	Low
10. Each BCP required to provide information on key suppliers: <ul style="list-style-type: none"> Name and contact information Description of the requirements from these suppliers 	Yes	<ul style="list-style-type: none"> The appendices to the template include one for contact information for key suppliers. Key suppliers should be monitored on an ongoing basis. Documentation accompanying the Validation Phase of BCP development stipulate clearly that BCP managers are accountable for managing supplier relationships. The Project Office is developing tools and templates to help BCP managers to assess the readiness of suppliers. 	No action required

Industry Canada BCP Template			
Best Practice	Industry Canada	Comments	Criticality
<p>11. Each BCP is required to contain detailed BU-level communication procedures:</p> <ul style="list-style-type: none"> • Call trees • Procedures • Staff communications at BU level 	Yes	<ul style="list-style-type: none"> • In sections 3.7 and 4.5, the template requires business units to identify communication procedures for both internal and external stakeholders, staff, etc. • <i>It is unclear if business units are required to communicate with the Y2K Project Office or any special coordinating body. The BCP makes no reference to a department-wide communications plan which business units would observe.</i> 	Low
<p>12. The template requires respondents to identify BCP monitoring and detection strategies.</p>	No	<ul style="list-style-type: none"> • It is common for organizations to establish strategies for proactively monitoring potential points of failure, like the status of key dependencies and suppliers. In turn, contingency plans are continuously modified as they react to any changes. • Monitoring and detection strategies typically include: <ul style="list-style-type: none"> ▸ The frequency and type of monitoring • An outline of roles and responsibilities (who will monitor? Who will be alternates?) ▸ Clear reporting requirements (to log whether escalation required, status, action taken and date and time resolved) ▸ Respondents should be supplied with monitoring and detection templates to assist their work. • <i>The BCP template does not include a requirement to monitor and detect dependencies. Nor does it contain a requirement to report changes to the contingency plan to the Y2K Project Office or a central coordinating body charged with managing the BCPs.</i> 	See Recommendation Two
<p>13. The BCP contains a Training Strategy:</p> <ul style="list-style-type: none"> • Types, Dates, Personnel • Planning requirements (is there a training log for each test, describing objectives, issues raised and follow-ups noted?) • Ownership • Reporting requirements (to Project Office?) 	Yes	<ul style="list-style-type: none"> • The template contains room for a Training, Testing and Maintenance Plan. These plans are still being developed within Industry Canada and are part of the Validation Phase. 	No action required
<p>14. The BCP contains a Testing Strategy</p> <ul style="list-style-type: none"> • Identify types • Schedule • Review and reporting process • Test recording process (description of test, objectives assumptions, test method, test criteria, issues raised, resolution of issues and person responsible for addressing issues, action items, centrally logging all test records and changes to plan) 	not available	<ul style="list-style-type: none"> • The template contains room for a Training, Testing and Maintenance Plan. These plans are still being developed within Industry Canada and are part of the Validation Phase. 	No action required

Industry Canada BCP Template			
Best Practice	Industry Canada	Comments	Criticality
15. The BCP contains a Plan Maintenance strategy <ul style="list-style-type: none"> • Ownership (who is responsible?) • Reporting requirements • Frequency • Deployment schedule 	not available	<ul style="list-style-type: none"> • The template contains room for a Training, Testing and Maintenance Plan. These plans are still being developed within Industry Canada and are part of the Validation Phase. 	No action required