Standards – Guidance and Examples

Operational Controls and Procedures

Standard
3.2 Business Continuity / Disaster Recovery

Rationale

Business continuity plans which are documented and regularly tested provide assurance that services can continue to be delivered and services remain available.

Business continuity plans ensure that critical scheme data and records are secured, protected from destruction and available to enable services to be provided

Outcomes

- Services available at all times;
- planed downtimes are known and communicated to clients and scheme members;
- services recovered quickly in the event of a disaster;
- critical data not lost or permanently damaged;
- schemes can be confident that services will continue to be provided.

Measurement / Evidence

- The administrator should have a documented business continuity plan, including disaster recovery, demonstrating:
  - Robust security, back-up and/or recovery procedures for paper files and all scheme records;
  - alternative premises appropriate to the scale of the operation;

- a communication plan (internal and external) with an appropriate cascade of instructions;

- testing should be carried out at least annually;

- the results of the tests should be reported to clients, including as a minimum, the date of the test, the general results of the tests, whether there were any material failings identified and, if so, what corrective action is being taken and the date of the next planned test. Where on line systems are in use this reporting also applies to any penetration testing undertaken;

- exceptions identified in tests should be subject to a remedial action plan, with timelines and responsibilities identified and evidence that the action plan has been/is being fulfilled;

- the results of the testing should be communicated to the trustee board /sponsor in accordance with the 'Sponsor/Board Reporting' standard.

General Principles

PASA believes that having documented procedures which are tried and tested is necessary to ensure continuity and consistency of service should a BCP incident arise. They help to ensure that all the necessary steps are taken to provide ongoing service in the event of a disaster, ensuring the staff and clients are aware of the situation.

Providers need to be able to demonstrate that their processes are clearly defined and maintained; that they are tested regularly and they are taking corrective action where procedures fail to work.

It is expected that the audit of the BCP plan will be appropriate to the TPA/in-house organisation.

Application to TPAs and Accreditation Approach

The accreditation team will randomly select procedures and test results look for:
- adherence to procedures during testing;

- evidence of the process for ensuring procedures are maintained and updated as necessary or following testing outcomes;

- evidence the controls in place for monitoring these are being followed;

- evidence of the management reporting and escalation route for non-adherence to procedures

Application to In-House Teams and Accreditation Approach

PASA recognises that the In-house team will be covered by the employer's BCP and therefore will take this into account. The accreditation

team will look for:

- adherence to procedures during testing;

- evidence of the process for ensuring procedures are maintained and updated as necessary or following testing outcomes;

- evidence the controls in place for monitoring these are being followed;

- evidence of the management reporting and escalation route for non-adherence to procedures.

Timelines

PASA expects these BCP procedures to be in place immediately.