

**ACTION PLAN IMPLEMENTATION STATUS UPDATE
REPORT TO THE AUDIT COMMITTEE - AS OF MARCH 31, 2012**

Chief Financial Officer			
<i>Audit of Business Continuity Planning APPROVAL DATE: 20/06/2011</i>			
PROJECT RECOMMENDATIONS	ACTION PLAN	EXPECTED COMPLETION DATE	PROGRAM RESPONSE
<p>1. Develop a multi-year plan that addresses gaps in the BCP Program and present it to an executive committee for review and approval. The planning process should include a reassessment of the program objectives, establishment of measurable goals and targets, development of fully costed strategies to implement the program, and a reassessment of BCP Program governance.</p>	<p>The Director, ITSD – in collaboration with the DSO – will:</p> <ul style="list-style-type: none"> • Conduct an organizational assessment to determine the best-fit placement of the function, and options for management consideration regarding changes to program governance for improving the effectiveness of the program. Assessment will include capacity options given current state (eg. BCP Coordinator position is currently vacant), and the training requirements associated to BCM-related responsibilities. • Develop a 3 year tactical plan which prioritizes and addresses the identified gaps within the Business Continuity Management (BCM) file commensurate with the risk each gap presents, and present the plan to the Departmental Operations Committee (DOC) for 		<p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>An organizational assessment has been drafted and circulated among key stakeholders within the IMB which identifies that the retention of the program within the IMB as the recommended option for AANDC moving forward. The BCP Coordinator position has been identified as a priority, and a staffing action is nearing completion to have the position re-staffed (AS-5 / deployment).</p> <p>A 3 year tactical plan has been begun, but will not be completed by end of Q4 2011-12. It will be completed in conjunction with other Branch planning exercises through Q1 2012-13.</p> <p>Expected return to OC in mid-to-late Q2 with recommendations of the file moving forward based on strategies developed in</p>

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	<p>approval.</p> <p>This plan will include:</p> <ul style="list-style-type: none"> i. Establishment of measureable goals/targets ii. Development of fully costed strategies and options for DOC consideration (human resources, systems, etc) <p><u>Actions</u></p> <ul style="list-style-type: none"> • Draft of organizational assessment for circulation and comments • Draft of tactical plan for circulation and comments 	<p>End Q2, 2011-12</p> <p>Mid Q3, 2011-12</p>	<p>the tactical plan.</p> <p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>An organizational assessment has been drafted and circulated among key stakeholders within the IMB which identifies that the retention of the program within the IMB as the recommended option for AANDC moving forward. The BCP Coordinator position has been identified as a priority, and a staffing action is nearing completion to have the position re-staffed (AS-5 / deployment).</p>

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	<ul style="list-style-type: none"> Presentation of organizational assessment and tactical plan including viable options to DOC 	End Q3, 2011-12	<p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>A 3 year tactical plan has been begun, but will not be completed by end of Q4 2011-12. It will be completed in conjunction with other Branch planning exercises through Q1 2012-13.</p> <p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>Expected return to OC in mid-to-late Q2 with recommendations of the file moving forward based on strategies developed in the tactical plan.</p> <p>AES: Recommendation is closed.</p>
2. Revise the INAC BCM Policy to	The Director, ITSD – in collaboration		<p>PROGRAM RESPONSE: Status: Underway</p>

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<p>ensure that roles and responsibilities for directing and reporting on the BCP Program are clear.</p>	<p>with the DSO – will:</p> <ul style="list-style-type: none"> • Consult with key stakeholders, including but not limited to: the three (3) Critical Service program areas, a sample of Critical Support Service program areas and Regions, Communications, and Public Safety Canada to refresh roles and responsibilities pertaining to BCM. • Update the BCM Policy to reflect: updated roles and responsibilities, mandatory seniority level of BCM representation in Regions and Sectors, and input from organizational assessment (Item #1 above), including the more explicit definition of the BCP Coordinator’s challenge function identified within Item #3. 		<p>Update/Rationale: As of 31/03/2012:</p> <p>Multiple requests have been made to Public Safety Canada (PSC) in relation to an updated BCM Operational Security Standard and the associated time lines; however, only a blanket statement of “currently under review” has been provided. Consequently, efforts to revamp the internal BCM policy statement have been deferred until more prescriptive guidance is provided by PSC on potential policy changes that would directly impact the file.</p> <p>A Communications Plan is currently being drafted which will emphasize roles/responsibilities pertaining to the BCM file, and is expected to be completed by mid-Q1 2012-13. This will emphasize the needs for BCM and continue to clarify roles and responsibilities. The annual update and maintenance request – which includes the policy needs for ensuring the</p>

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	<p><u>Actions</u></p> <ul style="list-style-type: none"> • Begin consultations with key stakeholders 	Mid Q2, 2011-12	<p>completion of BIAs/BCPs and the associated accountability of programs to complete those deliverables – was made to OC in March 2012.</p> <p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>Public Safety Canada was engaged via the BCP Helpdesk twice during 2011-12; their operational security standard (OSS) is currently under review with no established date for publication.</p>
	<ul style="list-style-type: none"> • Updated BCM policy presented to DOC for approval 	Mid Q4, 2011-12	<p>PROGRAM RESPONSE: Status: On Hold Update/Rationale: As of 31/03/2012:</p> <p>Waiting for prescriptive guidance from PSC as to contents of new OSS on BCP so that effort is not duplicated, and departmental</p>

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			efforts are aligned with Centre. AES: Implementation on-going.
3. Ensure that the Departmental BCP Coordinator plays a more active role in advising and challenging managers of critical services and critical support services throughout the process of developing, testing and updating BIAs and BCPs.	<p>Director, ITSD – in collaboration with the DSO – will:</p> <ul style="list-style-type: none"> Working with Communications, develop a communication plan to ensure that the authority of the new BCP Coordinator is readily shared with all stakeholders in the department. Emphasis will be placed on the advisory services provided by the BCP Coordinator. Implement operationalized processes based on new BCM policy similar to IT Security Certification and Accreditation process (CIO, DSO, and DG of responsible 		<p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>A Communications Plan is currently being drafted which will emphasize roles/responsibilities pertaining to the BCM file, and is expected to be completed by mid-Q1 2012-13.</p> <p>New endorsement process has been developed for updating and recording progress of BIA/BCP updates on an annual basis, with initial focus on Level 1 and Level 2 services. This process has been initially shared with the Regional/Sector BCP Coordinators and has been approved</p>

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	<p>program area will need to formally sign off on yearly BIA/BCP updates) for existing Critical Services and Critical Support Services. This process will include a provision by which the CIO and DSO will not endorse the signoff of BIA/BCP without appropriate endorsement by BCP Coordinator.</p> <ul style="list-style-type: none"> Other actions as necessary will be developed and implemented, based on direction set by DOC as related to organizational assessment and tactical plan options outlined in Item #1. <p>Actions</p> <ul style="list-style-type: none"> Communication Plan developed 	End Q3, 2011-12	<p>by the OC (March 2012). Consultation with the DSO was done to ensure alignment, and to help inform the Departmental Security Plan update process in future years. The process will be updated as necessary for the next cycle, as lessons learned are recorded and addressed.</p> <p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>A Communications Plan is currently being drafted which will emphasize</p>

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	<ul style="list-style-type: none"> Updated BIA/BCP sign off process designed and developed, presented in conjunction with BCM refreshed policy to DOC. 	Mid Q4, 2011-12	<p>roles/responsibilities pertaining to the BCM file, and is expected to be completed by mid-Q1 2012-13.</p> <p>PROGRAM RESPONSE: Status: Request to Close (completed) Update/Rationale: As of 31/03/2012:</p> <p>New endorsement process has been developed for updating and recording progress of BIA/BCP updates on an annual basis, with initial focus on Level 1 and Level 2 services. This process has been initially shared with the Regional/Sector BCP Coordinators and has been approved by the OC (March 2012). Consultation with the DSO was done to ensure alignment, and to help inform the Departmental Security Plan update process in future years. The process will be updated as necessary for the next cycle, as lessons learned are recorded and addressed.</p>

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			AES: Implementation on-going.
4. Develop a formal training and awareness program for BCP Coordinators and managers of critical services (and critical support services). The level of formal training should consider the extent to which the Departmental BCP Coordinator also provides advice and hands-on support throughout the process of developing and testing BIAs and BCPs.	<p>Director, ITSD – in collaboration with the DSO – will:</p> <ul style="list-style-type: none"> • Consult with Public Safety to determine if new training and awareness products are available for use by client departments. • Review existing BCM-related material available to the department (such as the Institute for Continuity Management or the Canada School of Public Service) and establish baseline mandatory and/or recommended training for BCM-related roles, in consideration of DOC guidance provided regarding Item #1. • Other actions as necessary will be developed and 		<p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>Public Safety Canada was engaged, and no training materials for use by client departments are available at this time.</p> <p>The ITSD is currently looking at alternate vehicles for providing training to resources with BCP responsibilities, and will include these options within the 3 year tactical plan currently being drafted (please refer to #1 above), including a review of material from the CSPS (only 1 course offering currently exists).</p> <p>As an interim measure, Microsoft PowerPoint presentations have been</p>

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	<p>implemented, based on direction set by DOC as related to organizational assessment and tactical plan options outlined in Item #1.</p> <p><i>Note: INAC's BCP Awareness/Training approach was approved by Public Safety during H1N1 – ie. providing templates and being available for consultation on an “as needed basis”. However, we do agree with the audit results that a more comprehensive approach, particularly for Critical Services and Critical Support Services would continue to mature the BCM function and increase the effectiveness of BCP-efforts.</i></p> <p>Actions</p> <ul style="list-style-type: none"> • Consultation with Public Safety 	End Q1, 2011-12	<p>developed and will be approved in Q1 for use informing both the BIA and BCP processes. The ITSD remains available to provide support services to Regional / Sectoral staff with BCM responsibilities.</p> <p>PROGRAM RESPONSE: Status: Request to Close (completed) Update/Rationale: As of 31/03/2012:</p> <p>Public Safety Canada was engaged, and</p>

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	<ul style="list-style-type: none"> Formalize training material for managers of Critical Services and Critical Support Services 	Beginning Q4, 2011-12	<p>no training materials for use by client departments are available at this time.</p> <p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>The ITSD is currently looking at alternate vehicles for providing training to resources with BCP responsibilities, and will include these options within the 3 year tactical plan currently being drafted (please refer to #1 above), including a review of material from the CSPS (only 1 course offering currently exists).</p>
	<ul style="list-style-type: none"> Integrate training coverage as part of reporting process implemented for Item #5. 	Beginning Q4, 2011-12	<p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>As an interim measure, Microsoft</p>

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			<p>PowerPoint presentations have been developed and will be approved in Q1 for use informing both the BIA and BCP processes. The ITSD remains available to provide support services to Regional / Sectoral staff with BCM responsibilities.</p> <p>AES: Implementation on-going.</p>
<p>5. Improve monitoring and reporting of the effectiveness of the BCP Program in regions and sectors to support continuous improvement and oversight (e.g., semi-annual reporting to an executive committee on the state of the BCP Program, including significant program gaps, resolution rates for issues identified through BCP testing and disruptions, completion rates for various levels of BCP testing, completion rates for BCP training, etc.).</p>	<p>Director, ITSD – in collaboration with the DSO – will:</p> <ul style="list-style-type: none"> • Build upon the policy update (Item #2) and operationalized process development (Item #3) to ensure that biannual updates are provided across Regions and Sectors which are signed off at a sufficiently senior level (DG or above), including training coverage. • Develop a “scorecard” for 		<p>PROGRAM RESPONSE: Status: Underway Update/Rationale: As of 31/03/2012:</p> <p>The score-carding / report process has been developed and was presented to OC in March 2012. It will be used for Level 1 and Level 2 services through the Q1/Q2, with a presentation at OC with results in Q3.</p>

2011-06-20 Follow-up Report: Audit of Business Continuity Planning

CIDM# 4186650

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	<p>Critical Services and Critical Support Services (NCR and Regionally) and provide to responsible DGs on a biannual basis, which considers:</p> <ul style="list-style-type: none"> o Existing BCM gaps – BIA/BCP completion rates and completeness of plans o Status of testing (exercises) o Post mortems (both testing and post-events) <p>Actions</p> <ul style="list-style-type: none"> • Pilot Critical Service is identified, with review in Q1 2012 • Rollout to remaining Critical Services and Critical Support Services throughout 2012 • Aggregation of scorecards presented to DOC biannually, 	<p>Mid Q4 , 2011-12</p> <p>FY 2012</p> <p>FY 2012</p>	<p>Please see above.</p> <p>Please see above.</p> <p>Please see above.</p>

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	beginning in early 2012.		AES: Implementation on-going.