

## APPENDIX A

# Submissions and comments

We have consulted with DET, DELWP, DFFH, DH, DJCS, DJPR, DoT, DPC, DTF and Cenitex, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

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### Responses were received as follows:

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Mr Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
31/35 Collins Street  
Melbourne VIC 3000

08 February 2022

By Kiteworks ONLY

Dear Mr Greaves,

***Proposed Performance audit report Business Continuity during COVID-19***

Thank you for providing the report on Business Continuity during COVID-19 with audit findings and recommendations received 25 January 2022. I have considered the report and have been briefed by the Cenitex officers who were engaged in the audit activities. I note that there are no recommendations specifically directed to Cenitex.

Cenitex does not have any submission or comment on the issues raised in the report.

On behalf of the Cenitex officers involved with this audit and myself, I offer our appreciation and thanks to your team on a highly professional and consultative engagement. I consider the report is prudent in areas for the State to improve approaches to business continuity and we look forward to opportunities to work with relevant Departments. Cenitex is taking steps to review our own business continuity to ensure it supports our customers in their ongoing readiness.

My Executive team continue to have a strong focus on business continuity for Cenitex and will respond to any broader recommendations and approaches that may come once the report is released and tabled in Parliament.

Should you or your team require any further information or Cenitex can be of further assistance please contact Cenitex's Chief Risk Officer, Paul Kruspe on 0423 025 962 or by email [paul.kruspe@cenitex.vic.gov.au](mailto:paul.kruspe@cenitex.vic.gov.au).

Yours sincerely,



Chief Executive Officer

Classification: **OFFICIAL**

The Cenitex logo, consisting of the word "cenitex" in a bold, lowercase, sans-serif font.



Department of Environment,  
Land, Water and Planning

PO Box 500, East Melbourne,  
Victoria 8002 Australia  
delwp.vic.gov.au

Mr Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Ref: SEC015473



Dear Auditor-General

**PERFORMANCE AUDIT - BUSINESS CONTINUITY DURING COVID-19**

Thank you for your letter of 25 January 2022 enclosing the proposed report for the Victorian Auditor-General's Office (VAGO) 'Business Continuity during COVID-19' performance audit and inviting a submission from the Department of Environment, Land Water and Planning (DELWP) for inclusion in the final report.

DELWP appreciates the work of your office in conducting this audit.

Victoria has and continues to face a range of challenges resulting from the COVID-19 pandemic. Identifying opportunities for more efficient and effective business continuity planning will support Victorian government departments to continue the delivery of essential public services during and following major disruptions.

I am pleased to confirm acceptance of all recommendations directed to DELWP in the proposed report. An action plan detailing how we will address these recommendations is enclosed.

If you would like more information about this matter, please call Kirsty Douglas, Executive Director Legal and Governance, DELWP on 0411 282 551 or email [kirsty.douglas@delwp.vic.gov.au](mailto:kirsty.douglas@delwp.vic.gov.au)

Thank you again for writing.

Yours sincerely



**John Bradley**  
Secretary

09 / 02 / 2022

Any personal information about you or a third party in your correspondence will be protected under the provisions of the *Privacy and Data Protection Act 2014*. It will only be used or disclosed to appropriate Ministerial, Statutory Authority, or departmental staff in regard to the purpose for which it was provided, unless required or authorized by law. Enquiries about access to information about you held by the Department should be directed to [foi.unit@delwp.vic.gov.au](mailto:foi.unit@delwp.vic.gov.au) or FOI Unit, Department of Environment, Land, Water and Planning, PO Box 500, East Melbourne, Victoria 8002.



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# Business Continuity During COVID-19 performance audit

## DELWP's Management Action Plan

Recommendation	Agreed action	Completion date
<p><b>Recommendation 3:</b></p> <p>All departments undertake business impact analyses every two years, or more often when there are significant changes to their organisation</p>	<p><b>Accepted</b></p> <p>DELWP will continue to undertake business impact analyses (BIA) at least every two years, or more often when there are significant organisational changes. DELWP will amend the BIA process to ensure that it documents executive approval as required by <i>AS ISO 22301:2020 Security and resilience—Business continuity management systems—Requirements standard</i>.</p>	<p><b>31 August 2022</b></p>
<p><b>Recommendation 4</b></p> <p>All departments review their business continuity plans at least every two years to assess if they:</p> <ul style="list-style-type: none"> <li>• align with the <i>AS ISO 22301:2020 Security and resilience—Business continuity management systems—Requirements standard</i></li> <li>• identify clear activation criteria</li> <li>• reflect the current operating environment</li> <li>• cover prioritised services</li> <li>• include the need for additional or surge resources where relevant</li> <li>• include strategies for addressing long-term disruptions (either within the specific plan or in another linked document)</li> </ul>	<p><b>Accepted</b></p> <p>DELWP will continue to review the department's business continuity plans at least every two years. A program for this review will be established by 31 August 2022. The reviews will include an assessment of the plans' alignment to the ISO standard and, where required, will be amended to ensure that the plans fully align. DELWP's business continuity plans will continue to:</p> <ul style="list-style-type: none"> <li>• identify clear activation criteria</li> <li>• reflect the current operating environment</li> <li>• cover all prioritised services</li> <li>• include strategies to manage surge resources, where relevant</li> <li>• link to the department's Critical Incident Management Framework to manage long-term disruptions.</li> </ul>	<p><b>31 August 2022</b></p>
<p><b>Recommendation 5</b></p> <p>All departments review their business continuity management exercising program every two years to:</p> <ul style="list-style-type: none"> <li>• validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>• test a scenario that affects and involves multiple business units or departments simultaneously</li> </ul>	<p><b>Accepted</b></p> <p>DELWP will establish a program by 31 August 2022 to review its business continuity and critical incident management exercising programs every two years. When conducted, reviews will:</p> <ul style="list-style-type: none"> <li>• validate business continuity strategies across the department and align with the risk profile</li> <li>• test scenarios of disruptions of various types and complexities involving multiple business units and participate in scenarios that affect multiple departments simultaneously.</li> </ul>	<p><b>31 August 2022</b></p>
<p><b>Recommendation 6</b></p>	<p><b>Accepted</b></p>	<p><b>31 July 2022</b></p>



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<p>All departments include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include their:</p> <ul style="list-style-type: none"> <li>• roles and responsibilities</li> <li>• required response actions</li> <li>• reporting obligations.</li> </ul>	<p>DELWP will continue to provide training for staff who have business continuity and critical incident management responsibilities. This training ranges from one-on-one and small group guidance through to formal and comprehensive training, depending on the business continuity and critical incident management responsibilities of the staff.</p> <p>We will establish a mandatory training program by 31 July 2022. The mandatory training program will include initial training and refresher training at least every two years and include roles and responsibilities, required response actions and reporting obligations.</p>
<p><b>Recommendation 8</b></p> <p>All departments develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk.</li> </ul>	<p><b>Accepted</b> <span style="float: right;"><b>31 August 2022</b></span></p> <p>DELWP will review and, where required, amend its Business Continuity and Critical Incident Management frameworks to ensure they include the requirement to report to DELWP executive on impacted services, meeting recovery time objectives, and critical activities and services that may be at risk from a significant business continuity event.</p>
<p><b>Recommendation 9</b></p> <p>All departments review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.</p>	<p><b>Accepted</b> <span style="float: right;"><b>31 August 2022</b></span></p> <p>DELWP will review its post-incident review template and update to ensure that it includes sections on prioritised services, recovery time objectives, and the length of time that any critical services were disrupted.</p>



Department of  
Education and Training

Office of the Secretary

2 Treasury Place  
East Melbourne Victoria 3002  
Telephone: 03 9637 2000  
DX210083

BRI2294553

Mr Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE 3000

Dear Mr Greaves

**Proposed report: Business continuity during COVID-19**

Thank you for the letter of 25 January 2022 and the opportunity to comment on the proposed report for this performance audit.

The Department is committed to ensuring that its business continuity arrangements enable the continuation of essential public services during the COVID-19 pandemic and in any crisis/emergency.

The Department has reviewed the proposed report and has no comments. Please find attached an action plan that addresses the recommendations in the report.

If your team would like to discuss the content of this response further, please contact Bella Stagoll, Executive Director, Integrity, Assurance and Executive Services Division on (03) 7022 0120 or [bella.stagoll@education.vic.gov.au](mailto:bella.stagoll@education.vic.gov.au).

Yours sincerely



**Jenny Atta**  
Secretary  
Department of Education and Training  
10 / 02 / 2022

Your details will be dealt with in accordance with the *Public Records Act 1973* and the *Privacy and Data Protection Act 2014*. Should you have any queries or wish to gain access to your personal information held by this department please contact our Privacy Officer at the above address



## Response provided by the Secretary, DET—continued

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### DET provisional action plan: Business Continuity during COVID-19

#	Recommendations: That all departments	Response	#	The Department will:	By:
3	undertake BIAs every two years, or more often when there are significant changes to their organisation.	Accept	3.1	continue to undertake BIAs every two years, or more often when there are significant changes to the organisation.	June 2023
4	review their business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 <i>Security and resilience—Business continuity management systems—Requirements</i> standard</li> <li>identify clear activation criteria</li> <li>reflect the current operating environment</li> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or other linked document)</li> </ul>	Accept	4.1	review the business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 <i>Security and resilience—Business continuity management systems—Requirements</i> standard</li> <li>identify clear activation criteria</li> <li>reflect the current operating environment</li> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or other linked document)</li> </ul>	June 2023
5	review their business continuity management exercising program every two years to: <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a scenario that affects and involves multiple business units or departments simultaneously.</li> </ul>	Accept	5.1	review the business continuity management exercising program every two years to: <ul style="list-style-type: none"> <li>validate business continuity strategies across the whole department and make sure they align with the department's risk profile</li> <li>test a scenario that affects and involves multiple groups/divisions or departments simultaneously.</li> </ul>	June 2023
6	include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include their: <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>required response actions</li> <li>reporting obligations.</li> </ul>	Accept	6.1	include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. The training will include their: <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>required response actions</li> <li>reporting obligations.</li> </ul>	December 2022

Response provided by the Secretary, DET—continued

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8	develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on: <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that maybe at risk.</li> </ul>	Accept	8.1 develop guidelines within the DET Business Continuity Management Framework to ensure that when a significant business continuity event occurs, at a minimum, reports are provided to DET executives on: <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that maybe at risk.</li> </ul>	December 2022
9	review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.	Accept	9.1 review and update the post-incident report templates to include a section that outlines DET's prioritised services, recovery time objectives, services disrupted and how long they were disrupted for.	December 2022





Department of Families, Fairness and Housing

50 Lonsdale Street  
Melbourne Victoria 3000  
Telephone: 1300 475 170  
GPO Box 1774  
Melbourne Victoria 3001  
www.dffh.vic.gov.au  
BY 210218  
BAC-CO-24168

Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Dear Mr Greaves

Thank you for providing my department with the proposed *Business Continuity during COVID-19* audit report.

My department has reviewed the proposed report and notes the six recommendations directed to all departments and one to the Department of Fairness, Families and Housing, along with the Department of Justice and Community Safety and Department of Health. Our plan to address these recommendations is included in the attached table.

As you are aware, my department worked closely with the Department of Health during the audit given it primarily examined the activities of the former Department of Health and Human Services. I would like to take this opportunity to thank those involved from the Department of Health as well as your staff for their professional approach to this work.

I appreciate the proposed report goes some way to address matters raised by my department in response to the provisional draft report however I would appreciate the following outstanding concerns being noted:

- a) the content of the proposed report extends beyond the audit scope when reporting on a lack of department-wide business continuity plans; given that a department-wide business continuity plan is not required by relevant standards or guidelines.
- b) the content of the proposed report at times is contradictory, for example in suggesting that business continuity plans were overly complex and lacked sufficient strategies to address protracted disruptions. The department does not consider a brief business continuity plan (example of a plan on a page provided) appropriate for all hazard planning within our current context and instead retains a focus on comprehensive plans developed by business owners to inform appropriate strategies during a disruption.

Yours sincerely



Sandy Pitcher  
Secretary  
09 / 02 / 2022

**Business Continuity during COVID-19**

**Department of Families, Fairness and Housing Action Table**

Rec No.	Recommendation	DFFH Response	Action(s)	Completion date
<b>Departments' preparedness for a major disruption</b>				
3	<b>All departments</b> undertake business impact analyses every two years, or more often when there are significant changes to their organization.	Accept	This requirement has been embedded in the DFFH Business Continuity framework, effective November 2021, consistent with the following excerpt: <i>The analysis must be undertaken for new business areas or where changes have been made to activities within business areas. A Business impact analysis should be undertaken at a minimum, every two years.</i>	November 2021 Complete
4	<b>All departments</b> review their business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>• align with the AS ISO 22301:2020 <i>Security and resilience—Business continuity management systems—Requirements</i> standard</li> <li>• identify clear activation criteria</li> <li>• reflect the current operating environment</li> <li>• cover prioritised services</li> <li>• include the need for additional or surge resources where relevant</li> <li>• include strategies for addressing long-term disruptions (either within the specific plan or in another linked document)</li> </ul>	Accept	The DFFH Business Continuity policy, effective November 2021 requires business continuity plans to be updated: <ul style="list-style-type: none"> <li>• following a restructure</li> <li>• when there are significant changes in the environment in which the department operates</li> <li>• following a significant change in the department's risk profile</li> <li>• following activation of the plan during a business disruption or exercise – to apply lessons identified in debriefs</li> <li>• at a minimum every two years.</li> </ul> The consistency and robustness of departmental plans in meeting the AS ISO standards and addressing the specific points raised in the recommendation will be supported by a new BC IT system (procurement process to be undertaken in 2022).	December 2022



Response provided by the Secretary, DFFH—continued

Rec No.	Recommendation	DFFH Response	Action(s)	Completion date
5	<p>All departments review their business continuity management exercising program every two years to:</p> <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a scenario that affects and involves multiple business units or departments simultaneously</li> </ul>	Accept	<p>As of January 2022, the department's business continuity plans and mitigation strategies are actively being tested/validated as the department remains in an active business continuity response due to the COVID-19 pandemic.</p> <p>The departments Business Continuity Framework (November 2021) requires that <i>Business continuity plans should be exercised at a minimum annually to test if the strategies included are practical and achievable and to promote awareness and familiarity with the content of the plan. Exercises should prioritise testing of the business continuity plans for the highest risks.</i></p> <p>Executive board business continuity exercises involving multiple business units complement local exercising arrangements within Divisions.</p> <p>The consistency and robustness of the department's exercising program will be supported by a new BC IT system (procurement process to be undertaken in 2022).</p>	<p>November 2021</p> <p>Complete</p>
6	<p>All departments include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include their:</p> <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>required response actions</li> <li>reporting obligations</li> </ul>	Accept	<p>The implementation of appropriate Business Continuity training for staff will be encompassed in the development and implementation of the new Business Continuity Management System for the department.</p>	<p>December 2022</p>



Response provided by the Secretary, DFFH—continued

Rec No.	Recommendation	DFFH Response	Action(s)	Completion date
<b>Responding to a disruption</b>				
7	<b>Department of Justice and Community Safety, Department of Health and the Department of Families, Fairness and Housing</b> develop standalone pandemic plans.	Accept	The department will develop a standalone pandemic plan which integrates lessons from the COVID-19 pandemic.	December 2022
8	<b>All departments</b> develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on: <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk</li> </ul>	Accept	The department's Business Continuity policy and framework will be revised to outline reporting requirements more explicitly.	June 2022
9	<b>All departments</b> review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.	Accept	A post-incident report template will be implemented as part of the new department's Business Continuity Management System.	June 2022





Secretary

Department of Health

50 Lonsdale Street  
Melbourne Victoria 3000  
Telephone: 1300 650 172  
GPO Box 4057  
Melbourne Victoria 3001  
[www.health.vic.gov.au](http://www.health.vic.gov.au)  
DX 210081  
DH ref: BAC-CO-24252  
VAGO file no: 34659 21

Mr Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Via email: [andrew.greaves@audit.vic.gov.au](mailto:andrew.greaves@audit.vic.gov.au)

Dear Andrew

Thank you for providing my department with your proposed report for the *Business Continuity during COVID-19* performance audit, an audit of the effectiveness of the Department of Health and Human Services' business continuity arrangements prior to and during the early pandemic response.

I and my department have reviewed your revised draft report, noting the six recommendations directed to all departments and the one recommendation specific to the Department of Health. I am pleased to include my department's actions in response to the recommendations as an attachment to this letter.

There remain two issues in the report that I would be grateful for your office's further review and consideration.

First, you found that Victorian government departments had limited assurance that they continued to operate their prioritised services within their business continuity timeframes (p. 30). I believe that the assurance is afforded by what actually occurred. Specifically, demonstrably there was no cessation of critical services undertaken by the Department of Health during the pandemic. The "proof was very much in the pudding" as it were.

Second, you found that many departments, including the Department of Health, do not have a whole-of-department business continuity plan (p. 5). As you acknowledge, on page 25 of the report, such a plan is not required under the relevant ISO business continuity standard. I wonder whether hindsight bias has contributed to a judgement beyond what is expected or required.

Nonetheless, the report correctly identifies that my department does not currently have dedicated business continuity resources. I am pleased to report that we have since developed an eight-stage package that includes the proposal to appoint a dedicated business continuity team, the development of a business continuity framework, and the option to purchase a new business continuity IT system. My intent is that these improvements will help better ensure the provision of effective assurance processes and whole-of-department oversight.

I would like to take this opportunity to thank your staff for working collaboratively with the Department of Health and the Department of Families, Fairness and Housing on this performance audit.

Yours sincerely

  
**Professor Euan M Wallace AM**  
Secretary  
07/02/2022

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**OFFICIAL: Sensitive**

Response provided by the Secretary, DH—continued

Victorian Auditor-General's Office Performance Audit: *Business Continuity during COVID-19*

Department of Health Action Table

Rec No.	Recommendation	DH Response <i>Accept, Do not accept, Partial acceptance</i>	Action(s)	Completion date
<b>Departments' preparedness for a major disruption</b>				
Rec 3	Undertake business impact analyses every two years, or more often when there are significant changes to their organisation.	Acceptance in principle <sup>1</sup>	<ul style="list-style-type: none"> <li>A department-wide business impact analysis will be undertaken as part of the implementation of a new business continuity management system for DH.</li> </ul>	28 Feb 2023
Rec 4	Review the business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 <i>Security and resilience — Business continuity management systems — Requirements</i> standard</li> <li>identify clear activation criteria</li> <li>reflect the current operating environment</li> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or other linked document).</li> </ul>	Acceptance in principle	<ul style="list-style-type: none"> <li>A comprehensive review and update of the department's business continuity plan will be undertaken following the business impact analysis.</li> <li>A guide for business owners to review and refresh their business continuity plans, or develop plans for newly identified critical activities, will be made available in the interim.</li> </ul>	31 Aug 2023
Rec 5	Review the business continuity management exercising program every two years to: <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a scenario that affects and involves multiple business units or departments simultaneously</li> </ul>	Acceptance in principle	<ul style="list-style-type: none"> <li>The implementation of a new business continuity management system will include overarching principles outlining the exercising expectations and schedule.</li> <li>The process of validation of plans will be achieved through an exercise or through the conducting of a Post-incident Review following activation of plans due to a disruption.</li> </ul>	31 Aug 2023

<sup>1</sup> The acceptance of the recommendations by the department is conditional upon the successful allocation of funding for a dedicated business continuity team or upon a reallocation of resources from within the department.

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Response provided by the Secretary, DH—continued

Rec No.	Recommendation	DH Response <i>Accept, Do not accept, Partial acceptance</i>	Action(s)	Completion date
Rec 6	<p>Include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include their:</p> <ul style="list-style-type: none"> <li>• roles and responsibilities</li> <li>• required response actions</li> <li>• reporting obligations</li> </ul>	Acceptance in principle	<ul style="list-style-type: none"> <li>• The implementation of a new business continuity framework, as part of the revised business continuity management system, will include a learning and development strategy that provides training principles and minimal requirements.</li> <li>• Key elements of the strategy will include: <ul style="list-style-type: none"> <li>– identifying key roles and responsibilities;</li> <li>– required preparation, response and recovery actions; and</li> <li>– reporting obligations.</li> </ul> </li> </ul>	28 Feb 2023
<b>Responding to a disruption</b>				
Rec 7	Develop standalone pandemic plans	Acceptance in principle	<ul style="list-style-type: none"> <li>• DH will develop a standalone business continuity pandemic plan.</li> <li>• All department business continuity plans will also be required to capture the anticipated staffing capacity and capability to ensure ongoing delivery of critical activities</li> </ul>	31 Aug 2023
Rec 8	<p>Develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk</li> </ul>	Acceptance in principle	<ul style="list-style-type: none"> <li>• The DH business continuity management system will identify a reporting structure and will contain strategies for escalating and monitoring the stabilising, continuing, resuming, and recovering these activities specific to the business disruption.</li> <li>• Reporting tools will be developed as part of the system.</li> </ul>	31 Aug 2022
Rec 9	Review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.	Acceptance in principle	<ul style="list-style-type: none"> <li>• A post-incident reporting tool will be developed that will include recovery time objective parameters and the impact of disruptions.</li> <li>• This tool will be made available for business owners to ensure that key improvement opportunities are undertaken while the department's business continuity management system undergoes a refresh.</li> </ul>	31 Aug 2022

**OFFICIAL: Sensitive**



## Department of Justice and Community Safety

Secretary

Level 26  
121 Exhibition Street  
Melbourne Victoria 3000  
Telephone: (03) 9915 3759  
[www.justice.vic.gov.au](http://www.justice.vic.gov.au)  
DX: 210077

Our ref: EBC 2202 0089

Mr Andrew Greaves  
Victorian Auditor-General  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Dear Mr Greaves

Thank you for your letter of 25 January 2022 and the opportunity to provide a response to the proposed report on *Business Continuity during COVID-19*.

The Department of Justice and Community Safety is committed to effective business continuity management to ensure it responds quickly to disruptions and continues to deliver critical services to the community.

The department has reviewed the report and has no feedback. It is pleasing to note the report's many positive findings about the department's business continuity practices.

I have attached the department's action plan in response to your recommendations. Some recommendations have already been addressed and others will be completed by the end of June 2022.

If your office requires further information, please contact Scott Farquharson, Executive Director, Assurance, 0400 094 007 or via email at [scott.farquharson@justice.vic.gov.au](mailto:scott.farquharson@justice.vic.gov.au).

Yours sincerely



**Rebecca Falkingham**  
Secretary

**14/02/2022**

*Attachment – DJCS action plan – Business continuity during COVID-19*





### DJCS action plan: Business continuity during COVID-19

#	VAGO recommends that all departments:		#	DJCS will...	By end of
3	Undertake business impact analyses every two years or more often when there are significant changes to their organisation.	Accept	3.1	Continue to implement business impact analyses on an annual basis or when there are significant changes to the organisation. (Completed.)	Feb 2022
4	Review their business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 <i>Security and resilience—Business continuity management systems—requirements</i> standard</li> <li>identify clear activation criteria</li> <li>reflect the current operating environment</li> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or in another linked document).</li> </ul>	Accept	4.1	Continue to review business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the ISO standard</li> <li>identify clear activation criteria</li> <li>cover prioritised services</li> <li>reflect the current operating environment</li> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or other linked document).</li> </ul> (Completed.)	Feb 2022
5	Review their business continuity management exercising program every two years to: <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a scenario that affects and involves multiple business units or departments simultaneously.</li> </ul>	Accept	5.1	Review the business continuity management exercising program every two years to: <ul style="list-style-type: none"> <li>validate business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a complex scenario that involves multiple business units or departments.</li> </ul>	Jun 2022
6	Include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include: <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>required responses actions</li> <li>reporting obligations.</li> </ul>	Accept	6.1	Continue to include mandatory training for business continuity coordinators when they commence in the role and at least every two years. This training will include: <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>required responses actions</li> <li>reporting obligations.</li> </ul> (Completed.)	Feb 2022

Response provided by the Secretary, DJCS—continued

#	VAGO recommends that DJCS, DH, and DFFH:		#	DJCS will...	By end of
7	Develop standalone pandemic plans.	Accept	7.1	Prepare a pandemic plan.	Jun 2022
#	VAGO recommends that all departments:		#	DJCS will...	By end of
8	<p>Develop guidelines to ensure that when a business continuity event occurs, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk.</li> </ul>	Accept	8.1	<p>Update the Communications Procedure for Disruption Events to ensure that when a business continuity event occurs, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• whether any recovery time objectives have not been met</li> <li>• any other services that may be at risk.</li> </ul>	Jun 2022
9	Review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.	Accept	9.1	Update the post-activation review template to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.	Jun 2022

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Department of Jobs, Precincts and Regions

GPO Box 4509  
Melbourne,  
Victoria 3001 Australia  
Telephone: +61 3 9651 9999  
DX 210074

Mr Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Dear Mr Greaves

**VAGO's Proposed Report – Business continuity during COVID-19**

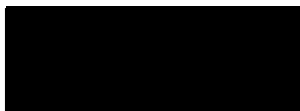
Thank you for your letter of 25 January 2022, providing the department with the proposed report for VAGO's performance audit on Business Continuity during COVID-19. We welcome the opportunity to provide our submission and comments to be included in the report.

The Department of Jobs, Precincts and Regions has successfully maintained continuity of our prioritised services during COVID-19. The department is well positioned to strengthen its business continuity management program in 2022 based on COVID-19 experiences, internal and VAGO audits, and the roll out of systems, tools, and training.

Overall, VAGO make constructive recommendations. We have accepted five and partially accepted one recommendation relevant to the department.

Our detailed response to each recommendation is enclosed (see Attachment 1). If you require further information, please contact Sri Indra, Acting Director Audit and Assurance on 0417383810 or [sri.indra@ecodev.vic.gov.au](mailto:sri.indra@ecodev.vic.gov.au).

Yours sincerely



**Simon Phemister**  
Secretary

10 / 02 / 2022



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Department of Jobs, Precincts and Regions

Attachment 1

#	For	Recommendation	Accepted/ not accepted	DJPR action	Implementation date
3	All departments	Undertake business impact analyses every two years, or more often when there are significant changes to their organisation (see Section 2.2)	Accept.	DJPR's business impact analyses (BIAs) will be reviewed and updated at least every two years and following significant change.	30 September 2022
4	All departments	Review their business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 Security and resilience—Business continuity management systems—Requirements standard</li> <li>identify clear activation criteria</li> <li>reflect the current operating environment</li> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or in another linked document) (see sections 2.4, 3.1 and 3.2)</li> </ul>	Partially accept.	DJPR accepts the elements of this recommendation with the exception of including strategies for long term disruptions in business continuity plans (BCPs). DJPR's critical incident management arrangements provide the response structures to address long term disruptions. Strategies for long term disruption will be included in BCPs if there is a need and this will be assessed on a case-by-case basis. DJPR has recently reviewed BCPs for staffing shortage and supply chain disruption risk scenarios. DJPR's BCPs will be reviewed and updated at least every two years and following significant change.	30 September 2022
5	All departments	Review their business continuity management exercising program every two years to: <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a scenario that affects and involves multiple business units or departments simultaneously (see section 2.2 and 2.5)</li> </ul>	Accept.	DJPR will conduct an annual program of major critical incident and business continuity scenario exercises. We will also provide guidance to support business areas exercise their individual BCPs. A fit-for-purpose and resource appropriate model will be implemented within business areas.	30 November 2022
6	All departments	Include mandatory training for staff who have dedicated business continuity responsibilities when	Accept.	DJPR has a network of Business Continuity (BC) Coordinators who are inducted when they commence. A series of BC Coordinator forums	30 October 2022



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#	For	Recommendation	Accepted/ not accepted	DJPR action	Implementation date
		<p>they commence in the role and at least every two years. This should include their:</p> <ul style="list-style-type: none"> <li>• roles and responsibilities</li> <li>• required response actions</li> <li>• reporting obligations (see section 2.2)</li> </ul>		<p>are held each year to share knowledge and build capability.</p> <p>Induction is also provided to critical incident management team members, and training is provided at least annually.</p> <p>Other BCM stakeholders will be provided training materials annually.</p>	
8	All departments	<p>Develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk (see sections 2.2 and 3.3)</li> </ul>	Accept.	<p>DJPR will develop guidance and business area situation report templates that will be required to be completed by business areas when:</p> <ul style="list-style-type: none"> <li>• requested by a critical incident management team</li> <li>• service continuity is at risk</li> <li>• BCPs are enacted</li> <li>• recovery time objectives have not been met.</li> </ul> <p>The completed report will be shared with key stakeholders including the relevant executives.</p>	30 June 2022
9	All departments	<p>Review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long (see Section 3.3)</p>	Accept.	<p>DJPR will update its business continuity management lessons learnt framework to include a section that outlines the elements listed in VAGO's recommendation.</p>	30 June 2022



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## Department of Transport

GPO Box 2392  
Melbourne, VIC 3001 Australia  
Telephone: +61 3 9651 9999  
[www.transport.vic.gov.au](http://www.transport.vic.gov.au)  
DX 210074

Ref: BSEC-1-21-10205R

Mr Andrew Greaves  
Auditor-General of Victoria  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Dear Mr Greaves

### **Victorian Auditor-General's Office – Proposed Report – Business Continuity during COVID-19**

Thank you for your letter of 25 January 2022 relating to the '*Business Continuity during COVID-19*' performance audit and for the opportunity to provide comments on the proposed report.

The Department appreciates the opportunity to participate in this audit and acknowledges the nine (9) recommendations outlined in the report, of which six (6) are directed at all Departments.

The Department will leverage from the insights and recommendations outlined in the report to further strengthen the Business Continuity Program. The Department will continue to embed business continuity into the organisation through reviews of its business impact analysis, launching a new COVIDSafePlan and business continuity plans, together with developing our people with dedicated business continuity training and support materials.

The Department's action plan on the proposed report is attached for your information.

Yours sincerely



**Paul Younis**  
Secretary  
Department of Transport

7 February 2022



## Business Continuity during COVID-19

VIC Department of Transport Action Plan

No.	VAGO recommendations	Action	Completion date
3.	We recommend that all Departments undertake BIAs every two years, or more often when there are significant changes to their organisation.	<ul style="list-style-type: none"> <li>DoT completed an annual review of its BIAs October 2021.</li> <li>The BIA's will be reviewed again in April 2022 following the finalisation of the current activities associated with DoT Refinement. In line with structures being finalised, a review of the existing BIAs will be undertaken to ensure DoT's business activities (including prioritised activities) are aligned and if needed, any new business activities identified and BCM impact assessed.</li> <li>The Business Continuity Management System Framework outlines that BIA's will be undertaken at least once every 2 years.</li> </ul>	30/06/2023
4.	<p>We recommend that all Departments review their business continuity plans at least every two years to assess if they:</p> <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 Security and resilience - Business continuity management systems - Requirements standard;</li> <li>identify clear activation criteria;</li> <li>reflect the current operating environment;</li> <li>cover prioritised services;</li> <li>include the need for additional or surge resources where relevant; and</li> </ul>	<ul style="list-style-type: none"> <li>DoT new BCPs were launched on 30 November 2021.</li> <li>Once the DoT restructure is finalised and subsequent BIA reviews completed, BCPs will be reviewed to ensure correct naming conventions are applied, and associated business activities are correctly aligned. This includes BC strategy and solutions.</li> <li>Findings from the review will be reflected in business continuity plans.</li> <li>DoT restructure commenced in November 2021 and will conclude in April 2022. The restructure will impact the existing BC program delaying several initiatives until June 2023.</li> </ul>	30/06/2023

VIC Department of Transport – Management of Spending during COVID-19 – Action Plan

## Response provided by the Secretary, DoT—continued

No.	VAGO recommendations	Action	Completion date
	<ul style="list-style-type: none"> <li>include strategies for addressing long-term disruptions (either within the specific plan or other linked document).</li> </ul>		
5.	<p>We recommend that all Departments review their business continuity management exercising program every two years to:</p> <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile; and</li> <li>test a scenario that affects and involves multiple business units or Departments simultaneously.</li> </ul>	<ul style="list-style-type: none"> <li>DoT BCPs were scheduled for exercising between February and May 2022. Due to the DoT restructuring and Joint Venture, the timelines have been adjusted.</li> <li>The DoT BCP exercises will recommence once the BIA and BCP reviews are finalised. The BIA information is critical to the BCP which must be current and aligned to the new business structure before exercising.</li> </ul>	30/06/2023
6.	<p>We recommend that all Departments include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include:</p> <ul style="list-style-type: none"> <li>roles and responsibilities;</li> <li>required response actions; and</li> <li>reporting obligations.</li> </ul>	<ul style="list-style-type: none"> <li>In June 2021, the Business Continuity @ DoT eLearn was revised and relaunched. The BC eLearn is available to all staff within DoT.</li> <li>Between March and April 2022, BC foundation training is scheduled for DoT BC Champions. Due to the DoT restructure and VicRoads Modernisation project, this may be subject to change.</li> <li>Once the DoT restructure is finalised, a review of the DoT existing BC champions will be undertaken to ensure currency of the representatives.</li> <li>The BC foundation training will be rescheduled once the BC champion review is completed.</li> </ul>	30/06/2023
8.	<p>We recommend that all Departments develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on:</p> <ul style="list-style-type: none"> <li>what services have been impacted;</li> <li>if any recovery time objectives have not been met; and</li> </ul>	<ul style="list-style-type: none"> <li>DoT has developed a lesson learnt process which includes how to conduct a lesson learnt guide, a register to capture observations, post incident review report template etc. (23/07/2021).</li> <li>The new lessons learnt process was scheduled to commence in January 2022 however due to the DoT restructuring and Joint Venture, this has been paused.</li> </ul>	30/06/2023

VIC Department of Transport – Business Continuity during COVID-19 – Action Plan



Response provided by the Secretary, DoT—continued

No.	VAGO recommendations	Action	Completion date
	<ul style="list-style-type: none"> <li>any other services that may be at risk.</li> </ul>	<ul style="list-style-type: none"> <li>Once the DoT restructure is finalised, the new lessons learnt process will be implemented.</li> </ul>	
9.	We recommend that all Departments review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long.	<ul style="list-style-type: none"> <li>DoT lessons learnt supporting materials to be reviewed and additional information added (if needed).</li> </ul>	30/07/2022

VIC Department of Transport – Business Continuity during COVID-19 – Action Plan

## Response provided by the Secretary, DPC



### Department of Premier and Cabinet

1 Treasury Place  
Melbourne, Victoria 3002 Australia  
Telephone: 03 9651 5111  
[dpc.vic.gov.au](http://dpc.vic.gov.au)

Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Dear Mr Greaves

Thank you for your letter of 27 January 2022, providing the Department of Premier and Cabinet (DPC) with an opportunity to comment on the proposed performance audit report Business Continuity during COVID-19.

DPC appreciates the findings of your office, and the opportunity to reflect on our business continuity practice. Please find responses to the recommendations that relate to DPC enclosed with this letter.

The pandemic has highlighted the importance of appropriate business continuity planning, in line with risks and the relative costs of preparation, to ensure the continuation of critical services to Victorians. DPC is committed to ensuring our business continuity planning, exercises and activities represent good value for money and are appropriately scaled for the roles and functions we undertake.

Should you require further information in relation to DPC's response, please contact Evelyn Loh, Director, Corporate Governance, DPC via email on [evelyn.loh@dpc.vic.gov.au](mailto:evelyn.loh@dpc.vic.gov.au)

Yours sincerely



**Jeremi Moule**  
Secretary

10 / 02 / 2022

Your details will be dealt with in accordance with the *Public Records Act 1973* and the *Privacy and Data Protection Act 2014*. Should you have any queries or wish to gain access to your personal information held by this department please contact our Privacy Officer at the above address.



Response provided by the Secretary, DPC—continued

**Response to recommendations - DPC**

Recommendation	Agreed action	Completion Date
We recommend that the: Department of Premier and Cabinet and the Department of Treasury and Finance:		
<p>1. develops communication protocols and a list of prioritised services that will inform business continuity responses at whole-of government level (see Section 2.1).</p> <p><b>Accept-in-part</b></p>	<p>DPC will work with the Strategic Communications Executive network to develop whole of government business continuity communication protocols.</p> <p>Taking into account existing whole of government forums and recognising that the nature of a business continuity event may influence priorities, DPC will work with DTF to consider the value and utility of developing a list of prioritised services to inform business continuity responses at a whole of government level.</p>	30 June 2023
<p>2. review business continuity exercises across the State and engage with participants to either:</p> <ul style="list-style-type: none"> <li>• broaden the scope of any planned exercises or</li> <li>• introduce new exercises</li> </ul> <p>to ensure whole-of-government business continuity scenarios are tested at least every three years (see Section 2.1).</p> <p><b>Accepted-in-principle</b></p>	<p>DPC and DTF will review their BCPs to determine whether additions could be made to trigger advice to other departments in regard to Whole-of-government incidents, activations of plans, or other relevant advice.</p> <p>DPC and DTF will work together to understand the scope of departmental business continuity exercises and potential opportunities should changes to scope be possible, which, in addition to individual Departments' implementing the recommendations directed to them, will strengthen whole-of-government preparedness across the Victorian public sector.</p>	29 February 2024

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Response provided by the Secretary, DPC—continued

We recommend that all departments:		
Recommendation	Agreed action	Completion Date
<p>3. undertake BIAs every two years, or more often when there are significant changes to their organisation (see Section 2.2).</p> <p><b>Accepted</b></p>	<p>DPC will undertake a departmental BIA, every two years, or as needed, to support the department deliver its services, with a focus on areas that are higher risk, or that have experienced significant changes.</p> <p>A review of DPC's current departmental BIA is underway.</p>	30 June 2022
<p>4. review their business continuity plans at least every two years to assess if they:</p> <ul style="list-style-type: none"> <li>• align with the ISO standard</li> <li>• identify clear activation criteria</li> <li>• reflect the current operating environment</li> <li>• cover prioritised services</li> <li>• include the need for additional or surge resources where relevant</li> <li>• include strategies for addressing long-term disruptions (either within the specific plan or other linked document) (see sections 2.4, 3.1 and 3.2).</li> </ul> <p><b>Accepted</b></p>	<p>DPC will review its departmental business continuity plan in line with requirements under the <i>Financial Management Act 1994</i>.</p>	30 June 2022
<p>5. review their business continuity management exercising program every two years to:</p> <ul style="list-style-type: none"> <li>• validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>• test a scenario that affects and involves multiple business units or departments simultaneously (see section 2.2 and 2.5).</li> </ul> <p><b>Accepted</b></p>	<p>DPC will undertake suitable business continuity exercises, at least every two years, in line with the requirements under the <i>Financial Management Act 1994</i></p>	31 December 2022

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Response provided by the Secretary, DPC—continued

We recommend that all departments:		
Recommendation	Agreed action	Completion Date
<p>6. include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include their:</p> <ul style="list-style-type: none"> <li>• roles and responsibilities</li> <li>• required response actions</li> <li>• reporting obligations (see section 2.2)</li> </ul> <p><b>Accepted</b></p>	<p>Mandatory training will focus on members of the Continuity Leadership Team (CLT), who are responsible for the coordination of BC response at DPC.</p>	<p>30 September 2022</p>
<p>8. develop guidelines to ensure that when a significant business continuity event occurs, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk (see sections 2.2 and 3.3)</li> </ul> <p><b>Accepted</b></p>	<p>DPC will update documents to confirm reporting requirements via the Continuity Leadership Team</p>	<p>30 June 2022</p>
<p>9. review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long (see Section 3.3).</p> <p><b>Accepted</b></p>	<p>DPC will amend its post-incident report template accordingly.</p>	<p>30 June 2022</p>

**Note recommendation 7 (not shown above) is directed to Department of Justice and Community Safety, Department of Health and the Department of Families, Fairness and Housing**

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## Department of Treasury and Finance

1 Treasury Place  
Melbourne Victoria 3002 Australia  
Telephone: +61 3 9651 5111  
dtf.vic.gov.au  
DX210759

D22/18127

Mr Andrew Greaves  
Auditor-General  
Level 31  
35 Collins Street  
MELBOURNE VIC 3000

*Andrew*

Dear Mr Greaves

### PROPOSED REPORT - BUSINESS CONTINUITY DURING COVID-19

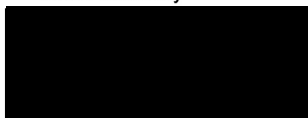
Thank you for the opportunity to respond to your proposed report. I am pleased to note that you have incorporated my feedback from the provisional report.

I note that the second recommendation has changed since the provisional draft report. Given the large number of agencies and offices across Victoria that could be conducting business continuity exercises, this new recommendation would be challenging to implement in full, and further, is not consistent with the model of devolved accountability in Victoria.

As written, the recommendation would impose an additional, significant and ongoing obligation on central agencies to take responsibility for the significant number of business continuity activities in place for a large number of agencies across the State. However, my Department has worked with the Department of Premier and Cabinet to identify actions that we believe will support improvements consistent with those identified in your report. These are outlined in the attached table.

My full responses to the recommendations are attached. Thank you again for providing an opportunity to comment on this important report.

Yours sincerely



David Martine  
**Secretary**  
10/02/2022



**Department of Treasury and Finance action plan to address recommendations from VAGO proposed report into Business Continuity During COVID-19**

No.	VAGO recommendation	Action	Completion date
1	Develop communication protocols and a list of prioritised services that will inform business continuity responses at whole-of-government level	<p><b>Accept in part</b></p> <p>The Department of Premier and Cabinet (DPC) and the Department of Treasury and Finance (DTF) will work with the Strategic Communications Executive network to develop whole of government business continuity communication protocols.</p> <p>Taking into account existing whole of government forums and recognising that the nature of a business continuity event may influence priorities, DTF will work with DPC to consider the value and utility of developing a list of prioritised services to inform business continuity responses at a whole of government level.</p>	June 2023
2	Review business continuity exercises across the state to ensure that whole-of-government business continuity scenarios are tested at least every three years. This includes engaging with participants to either broaden the scope of any planned exercises or introduce new exercises	<p><b>Accept in principle</b></p> <p>DPC and DTF will review their BCPs to determine whether additions could be made to trigger advice to other departments in regard to WoVG incidents, activations of plans, or other relevant advice.</p> <p>DPC and DTF will work together to understand the scope of departmental business continuity exercises and potential opportunities should changes to scope be possible, which, in addition to individual Departments implementing the recommendations directed to them, will strengthen WoVG preparedness across the VPS.</p>	February 2024
3	Undertake business impact analyses every two years, or more often when there are significant changes to their organisation	<p><b>Accept</b></p> <p>DTF will continue to promote the need to undertake Business Impact Assessments (BIA) into its process documentation and undertake BIAs every two years or more often when there are significant changes.</p>	December 2022
4	Departments review their business continuity plans at least every two years to assess if they: <ul style="list-style-type: none"> <li>align with the AS ISO 22301:2020 Security and resilience—Business continuity management systems—Requirements standard</li> <li>identify clear activation criteria</li> <li>reflect the current operating environment</li> </ul>	<p><b>Accept</b></p> <p>DTF will continue to review its business continuity plans at least every two years to ensure Departmental and group plans meet requirements.</p>	June 2022

Response provided by the Secretary, DTF—continued

No.	VAGO recommendation	Action	Completion date
	<ul style="list-style-type: none"> <li>cover prioritised services</li> <li>include the need for additional or surge resources where relevant</li> <li>include strategies for addressing long-term disruptions (either within the specific plan or in another linked document)</li> </ul>		
5	<p>Review their business continuity management exercising program every two years to:</p> <ul style="list-style-type: none"> <li>validate their business continuity strategies across the whole department and make sure they align with their risk profile</li> <li>test a scenario that affects and involves multiple business units or departments simultaneously</li> </ul>	<p><b>Accept</b></p> <p>DTF will review its exercise program schedule to ensure it continues to incorporate multiple business units in testing a complex scenario and ensure that business continuity strategies across the Department align with the Department's risk profile to inform and enhance the quality of our exercise program.</p>	September 2022
6	<p>Include mandatory training for staff who have dedicated business continuity responsibilities when they commence in the role and at least every two years. This should include their:</p> <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>required response actions</li> <li>reporting obligations</li> </ul>	<p><b>Accept</b></p> <p>DTF will consider the options on how best to deliver a mandatory training program for staff with business continuity responsibilities.</p>	December 2022
7	<p>That the Department of Justice and Community Safety, Department of Health and the Department of Families, Fairness and Housing develop standalone pandemic plans</p>	N/A	N/A



Response provided by the Secretary, DTF—continued

No.	VAGO recommendation	Action	Completion date
8	<p>Develop guidelines to ensure that when a significant business continuity event occurs, at a minimum, they report to their executive on:</p> <ul style="list-style-type: none"> <li>• what services have been impacted</li> <li>• if any recovery time objectives have not been met</li> <li>• any other services that may be at risk</li> </ul>	<p><b>Accept</b></p> <p>DTF will formalise its existing processes into a set of guidelines to inform reporting obligations to its executive group when a significant business continuity event occurs.</p>	June 2022
9	<p>Review their post-incident report templates to include a section that outlines their prioritised services, recovery time objectives, if their services were disrupted and if so, for how long</p>	<p><b>Accept</b></p> <p>DTF will review its post incident report template and update where required to align with this recommendation.</p>	June 2022