

Detailed Follow-up to Recommendations Related to the Business Continuity Management Audit

7.3.



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7.3. Detailed Follow-Up to Recommendations Related to the Business Continuity Management Audit

Business continuity management is a planning process to ensure that critical operations are resumed when an event interrupts a business unit's regular operations. It provides for measures and procedures to resume these operations in another location within a reasonable timeframe (based on the maximum interruption time allowed).

The 2014 Annual Report of the Bureau du vérificateur général (BVG) contained an Audit Report on Business Continuity Management. Its objective was to determine whether the Ville de Montréal (the City) is taking the necessary measures to deal with disaster risks that could affect its operations and thus ensure the continuity of those operations deemed critical.

Our work dealt with the following business units:

- ◆ The Direction générale de la Ville de Montréal (DG);
- ◆ The Service de sécurité incendie de Montréal (SIM);
- ◆ The Service de l'eau – Direction de l'eau potable (DEP);
- ◆ The Service des technologies de l'information (STI);
- ◆ The Service de police de la Ville de Montréal (SPVM).

All the business units had prepared action plans to address the recommendations contained in the report.

Yet in November 2021, only the DEP and the STI had adequately responded to the recommendations that concerned them. The DG, the SPVM and the SIM had not. In fact, of the 18 recommendations that concerned them, 17 remained unresolved, as shown in Table 1 below.

TABLE 1 | RECOMMENDATIONS ISSUED AND UNRESOLVED

BUSINESS UNIT	RECOMMENDATIONS ISSUED	RECOMMENDATIONS UNRESOLVED
Direction générale	2	1
Service de police de la Ville de Montréal	8	8
Service de sécurité incendie de Montréal	8	8
TOTAL	18	17

Source : Table produced by the BVG.

At that time, the BVG sent a memorandum reminding them that the dates for implementing the action plans to address these recommendations dated back more than five years. It is clear that these recommendations still remain unresolved more than seven years after the report was issued. The BVG asked the business units to reassess the relevance of the recommendations that concerned them and, where necessary, to adjust their action plan.

It emerged that the DG, the SPVM and the SIM still felt the recommendations were relevant, and that no tangible progress could be observed.

We decided to carry out a detailed follow-up of the action plans for the 17 unresolved recommendations. The goal was to encourage their implementation so that the City is sufficiently prepared in the event of a disaster (to avoid stoppages of services to Montrealers and reduce the time taken to resume operations). The BVG issued a letter to these business units on February 9, 2022, notifying them that it would be conducting this follow-up. Various meetings were held with the persons in charge of the business units to clarify the reasons for these delays.

In October 2022, the DG delegated responsibility for developing and coordinating the implementation of the business continuity program to the Direction de la sécurité civile, which reports to the SIM.

In early December 2022, the Direction de la sécurité civile gave us the new action plans of the DG, the SIM and the SPVM, aimed at addressing the audit report's recommendations. We analyzed the contents and confirmed that they were adequate.

The initial action plans and timelines, as well as the revised action plans of the DG and SIM with new timelines, are presented in the Appendix. For reasons of confidentiality and security, the SPVM's action plans are not published.

In the coming months, the BVG will closely monitor the progress made in implementing these new action plans, whose timelines now extend to December 2024.

7.3.1. Appendix – Comparison of Initial and Revised Action Plans

DIRECTION GÉNÉRALE

DIRECTION GÉNÉRALE				
AUDIT REPORT RECOMMENDATIONS	INITIAL ACTION PLAN (2014)		REVISED ACTION PLAN (2022)	
	CORRECTIVE ACTIONS INITIALLY PLANNED	TIMELINE	NEW CORRECTIVE ACTIONS	NEW TIMELINE
<p>4.2.B. Business Continuity Program Structure</p> <p>We recommend that the Direction générale:</p> <p>a) provide specific recurring budgets for the development, implementation and maintenance of a business continuity program;</p> <p>b) make municipal tools (recipe books) available to business units, such as:</p> <ul style="list-style-type: none"> the operational structure of the business continuity program; training sessions on the desired process; manuals or templates for each development phase; models or procedures to follow for performing exercises; tools for sharing and exchanging ideas (e.g., collaboration websites). 	<p>The implementation of this recommendation will stem from the following recommendation:</p> <p>4.1.B. Governance</p> <p>We recommend that the Direction générale develop specific management frameworks for the City's business continuity program that include:</p> <ul style="list-style-type: none"> a description of general objectives; a definition of the roles and responsibilities of members of the City's and business units' management teams; the scope of management frameworks (e.g., business units and paramunicipal corporations); business continuity requirements imposed on business units. 	2015 - 2020	<p>a) Action 1: Ensure that recurring budgets specific to business continuity related to the stated objectives are included in the budget process (July to October 2023).</p> <p>Deliverable: Information items contained in the budget of the SIM, making it possible to ascertain that such budgets are planned in line with business continuity.</p> <p>b) Action 1: Review and integrate the business continuity policy with the Montréal agglomeration's civil security policy, taking into consideration the lessons learned from the management of COVID-19 (2020–2022).</p> <p>Action 2: Put in place a functional structure for the business continuity program.</p> <p>Deliverable: Implementation of a new division dedicated to risk management and business continuity.</p>	<p>January 2024</p> <p>December 2023</p> <p>June 2023</p>

DIRECTION GÉNÉRALE (SUITE)			
AUDIT REPORT RECOMMENDATIONS	INITIAL ACTION PLAN (2014)		REVISED ACTION PLAN (2022)
	CORRECTIVE ACTIONS INITIALLY PLANNED	TIMELINE	NEW CORRECTIVE ACTIONS
			<p>Action 3: Put in place two training modules on the desired process.</p> <p>Deliverable: Two training modules dealing with:</p> <ol style="list-style-type: none"> 1. The process and adopted approach; 2. Acquiring the tools to contribute to the development of a Business Continuity Plan (BCP).
			<p>Action 4: Develop templates for each step in the process and make them available to the business units.</p> <p>Deliverable: Development of:</p> <ul style="list-style-type: none"> • Template 1: Business impact analysis (BIA); • Template 2: Risk analysis; • Template 3: "Continuity Strategies Inventory" form; • Template 4: Business Continuity Plan.
			<p>Action 5: Make share and collaboration disks available to the business units.</p> <p>Deliverable:</p> <ul style="list-style-type: none"> • Share disk via Google Workplace (G Suite) (TENTATIVE); • Share disk via the Zoho platform of the Centre de sécurité civile, used as part of emergency measures' information and communications sharing.

SERVICE DE SÉCURITÉ INCENDIE DE MONTRÉAL

SERVICE DE SÉCURITÉ INCENDIE DE MONTRÉAL			
AUDIT REPORT RECOMMENDATIONS	INITIAL ACTION PLAN (2014)		REVISED ACTION PLAN (2022)
	CORRECTIVE ACTIONS INITIALLY PLANNED	TIMELINE	NEW CORRECTIVE ACTIONS NEW TIMELINE
<p>4.1.C. Governance</p> <p>Subject to Recommendation 4.1.B. addressed to the Direction générale, we recommend that the Service de sécurité incendie de Montréal:</p> <ul style="list-style-type: none"> a) develop their management frameworks along the same lines as the City's, and ensure that, at the very least, they provide for: <ul style="list-style-type: none"> • a definition of the department's continuity objectives, • a detailed impact analysis of interruptions, • a continuity strategy for reducing these impacts, • continuity plans that describe in detail activities carried out to resume critical operations within an acceptable time, • a review and regular exercise drill schedule, b) assign responsibility for business continuity to a member of each of their management teams; c) establish specific business continuity objectives for each of their management teams d) establish a coordinated communication, monitoring and accountability process on the achievement of objectives. 	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015.</p>	December 2015	<p>a) Actions : Establish governance for business continuity to:</p> <ul style="list-style-type: none"> • Implement and monitor the organization's critical activities in accordance with the Ville de Montréal's business continuity policy; • Ensure the sustainability and efficacy of the SIM when a disruption occurs, using a framework and sound practices related to business continuity. <p>Deliverable: Administrative framework establishing business continuity governance that defines components a) to d) of the left-hand column.</p> <p>b) Deliverable: Management correspondence to nominate a member of its management team to be in charge of the business continuity file.</p> <p>c) Action: Establish specific objectives for each of the service centres Deliverable: Administrative framework or correspondence to establish specific objectives for each of the service centres regarding business continuity.</p> <p>d) Deliverable: Communication and accountability process on the achievement of objectives.</p>
			<p>Completed</p> <p>March 2023</p> <p>December 2023 + 1 year of validation</p>

SERVICE DE SÉCURITÉ INCENDIE DE MONTRÉAL (SUITE)			
AUDIT REPORT RECOMMENDATIONS	INITIAL ACTION PLAN (2014)		REVISED ACTION PLAN (2022)
	CORRECTIVE ACTIONS INITIALLY PLANNED	TIMELINE	NEW CORRECTIVE ACTIONS
<p>4.2.C. Business Continuity Program Structure</p> <p>We recommend that the Service de sécurité incendie de Montréal:</p> <p>a) Develop their management structures for the implementation of the business continuity program, including:</p> <ul style="list-style-type: none"> • Determining the persons responsible, • describing the roles and responsibilities of each, • defining the communication and accountability process; <p>b) provide specific recurring business continuity budgets in connection with the established objectives.</p>	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015.</p>	<p>December 2015</p>	<p>a) Actions:</p> <ul style="list-style-type: none"> • Define the coordination and identification structure for the persons in charge; • Put in place a structure to implement the business continuity program; • Attach this structure to and/or integrate it into the existing civil security structure (Sauvegarde des vies et protection des biens mission). <p>Deliverable: Updated Plan de mission Sauvegarde des vies et protection des biens and integrated business continuity management structure.</p> <p>b) Actions:</p> <ul style="list-style-type: none"> • Define the coordination and identification structure for the persons in charge; • Put in place a structure to implement a business continuity program; • Attach this structure to and/or integrate it into the existing civil security structure (Sauvegarde des vies et protection des biens mission). <p>Deliverables: Updated Plan de mission Sauvegarde des vies et protection des biens and integrated business continuity management structure.</p>
			<p>October 2023</p> <p>January 2024</p>

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AUDIT REPORT RECOMMENDATIONS	INITIAL ACTION PLAN (2014)		REVISED ACTION PLAN (2022)
	CORRECTIVE ACTIONS INITIALLY PLANNED	TIMELINE	NEW CORRECTIVE ACTIONS
<p>4.3.B. Crisis Management Structure</p> <p>We recommend that the Service de sécurité incendie de Montréal develop a response structure to meet business continuity needs and objectives that integrates all their critical operations.</p>	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015.</p>	December 2015	<p>Actions:</p> <ul style="list-style-type: none"> Update the existing crisis or incident structure (Sauvegarde des vies et protection des biens mission) to establish command, operations monitoring and communications systems to manage the incident and minimize the impact of the disturbance. Attach this structure to and/or integrate it into the existing civil security structure (Sauvegarde des vies et protection des biens mission). <p>Deliverable: Updated Plan de mission Sauvegarde des vies et protection des biens and integrated business continuity management structure.</p>
<p>4.4.B. Business Impact Analysis and Business Continuity Strategies</p> <p>We recommend that the Service de sécurité incendie de Montréal:</p> <ol style="list-style-type: none"> conduct an impact analysis for all their operations; communicate the results of the impact analysis to all business continuity program stakeholders; develop continuity strategies based on the results of the business impact analysis. 	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015.</p>	December 2015	<p>a) Action 1: Perform a business impact analysis (BIA) of its service centres that provide essential services to the population. The objectives are as follows:</p> <ul style="list-style-type: none"> Identify critical activities and assess the impact resulting from their interruption; Assess and justify the maximum amount of time that a critical activity can be interrupted without the impact becoming unacceptable for the organization (maximum duration of the acceptable interruption – MDAI);

SERVICE DE SÉCURITÉ INCENDIE DE MONTRÉAL (SUITE)				
AUDIT REPORT RECOMMENDATIONS	PLAN D'ACTION INITIAL (2014)		PLAN D'ACTION RÉVISÉ (2022)	
	ACTIONS CORRECTIVES INITIALEMENT PRÉVUES	ÉCHÉANCIER	NOUVELLES ACTIONS CORRECTIVES	NOUVEL ÉCHÉANCIER
			<ul style="list-style-type: none"> Assess the recovery time of an activity after an incident (recovery time objective – RTO); Identify the priorities for resuming operations; Identify dependency relationships with administrative units or external resources; Identify the human, material, information and infrastructure resources required for continuity. <p>Deliverable: Business impact analysis (BIA) for the targeted service centres.</p> <p>Action 2: Perform a risk analysis for the service centres concerned. The aim of this risk analysis is to:</p> <ul style="list-style-type: none"> Identify the weak points that must be addressed to reduce the probability of unavailability or of an impact on the unit's essential operations; Identify the potential causes of incident scenarios to reduce the probability of these incidents occurring by implementing preventive measures. <p>Deliverable: Risk analysis for the targeted service centres.</p>	
			<p>b) Action:</p> <ul style="list-style-type: none"> Inform and communicate the results of the BIA to the business continuity program stakeholders. <p>Deliverable: Instruction- or correspondence-type administrative framework.</p>	October 2023

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<p>4.5.B. Business Continuity Plans and Procedures</p> <p>We recommend that the Service de sécurité incendie de Montréal develop business continuity plans for all their critical functions, including:</p> <ul style="list-style-type: none"> a) defining the criteria for continuity plan activation; b) defining the roles and responsibilities of each stakeholder or each continuity team; c) defining activities to be performed in the event of a disaster in order to maintain an adequate level of service; d) determining critical resources (staff, equipment, etc.) required to relocate essential operations; 			<p>c) Actions:</p> <ul style="list-style-type: none"> • Determine strategies to ensure the continuity of critical activities that are not IT-dependent. • Determine strategies to ensure the continuity of critical activities that are IT-dependent. <p>Deliverables: : Inventory of continuity strategies in place.</p>	July 2023
	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015.</p>	December 2015	<p>Actions:</p> <ul style="list-style-type: none"> • Define the coordination structure and appoint the persons in charge. • Draft a business continuity plan. <p>Deliverable: Updated Plan de mission Sauvegarde des vies et protection des biens and integrated business continuity plans and procedures, defining components a) to f) of the left-hand column.</p>	Décembre 2023

SERVICE DE SÉCURITÉ INCENDIE DE MONTRÉAL (SUITE)				
AUDIT REPORT RECOMMENDATIONS	INITIAL ACTION PLAN (2014)		REVISED ACTION PLAN (2022)	
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<p>e) listing employees and third parties who must participate in continuity activities, including ways to contact them;</p> <p>f) developing operational procedures in the event of a disaster.</p>				
<p>4.6.B. Business Continuity Training We recommend that the Service de sécurité incendie de Montréal develop a training program for all business continuity plan stakeholders.</p>	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015</p>	December 2015	<p>Actions:</p> <ul style="list-style-type: none"> Develop a training program and integrate it. Integrate into a review and update cycle. <p>Deliverable: Business continuity training program adapted to the SIM (trainers, ready-to-deploy training, support material and schedule of compulsory sessions and enrolment).</p>	December 2023 + 1 year of validation
<p>4.7.B. Business Continuity Exercise Programs We recommend that the Service de sécurité incendie de Montréal develop exercise programs for members of business continuity response teams.</p> <p>Specifically:</p> <p>a) determine the types of exercises required;</p> <p>b) develop the objectives to be achieved for each type;</p>	<p>The Direction générale asked the SIM's management to broaden the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the "100 Resilient Cities" program, pioneered by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive business continuity action plan will be submitted to the Direction générale between now and the end of 2015.</p>	December 2015	<p>Actions:</p> <ul style="list-style-type: none"> Develop a training program and integrate it. Integrate into a review and update cycle. <p>Deliverable: Business continuity training program adapted to the SIM (trainers, ready-to-deploy training, support material and schedule of compulsory sessions and enrolment).</p>	December 2023 + 1 year of validation

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<p>c) develop an exercise drill schedule; d) document the learning acquired during exercises.</p> <p>4.8.B. Updating Business Continuity Documentation We recommend that the Service de sécurité incendie de Montréal establish a process for updating business continuity documentation that includes the following activities:</p> <p>a) determining components that need to be updated; b) developing a periodic review schedule; c) communicating changes to the various stakeholders; d) amending plans to take into account learning acquired during exercises or when the plans are used during interruptions in operations.</p>	<p>The Direction générale asked SIM management to expand the mandate of the Centre de sécurité civile to include concepts of resilience and business continuity.</p> <p>As part of the “100 resilient cities” program, overseen by the Rockefeller Foundation, the Centre de sécurité civile must establish a resilience strategy for the Montréal community by fall 2015. During this thought process, a comprehensive plan for business action continuity will be submitted to the Direction générale between now and the end of 2015.</p>	December 2015	<p>Actions: Integrate the update process for the business continuity program into the organization’s current processes. This involves:</p> <ul style="list-style-type: none"> • Determining the components of the program that need to be updated; • Establishing a timeline to complete the review and update at specific intervals over a set period; • Identifying and informing stakeholders of any amendment or change that concerns them. <p>Deliverable: Updated Plan de mission Sauvegarde des vies et protection des biens and integrated business continuity management cycle, defining components a) to d) of the left-hand column.</p>	December 2023 + 1 year of validation

