***Bad practices***

**ISO 22301 readiness version 2019**

**4 Context**

**4.1 Context of the company**

* *issues in the business context such as the regulatory environment are not taken into account*
* *in some cases, corporate culture is not taken into account*
* *the threats and weaknesses identified in the SWOT analysis remain without action*

**4.2 Stakeholders**

* *regulatory and legal requirements are not taken into account*
* *stakeholder expectations are not determined*
* *the list of stakeholders does not contain their field of activity*

**4.3 Scope**

* *certain workshops are outside the scope of the BCMS without justification*
* *the scope is obsolete (the new subsidiary is not included)*

**4.4 Business continuity management system**

* *some process output elements are not correctly defined (customers not taken into account)*
* *process efficiency criteria not established*
* *non-formalized process owner*
* *outsourced processes not determined*
* *very real activities are not identified in any process*
* *control of outsourced services not described*
* *sequences and interactions of certain processes are not determined*
* *criteria and methods to ensure the performance of processes are undefined*
* *monitoring of the performance of certain processes not established*
* *BCMS resources do not enable business continuity objectives to be achieved*
* *the BCMS is not updated (new processes not identified)*

**5 Leadership**

**5.1 Leadership and commitment**

* *top management commitment does not contain objectives*
* *communication on BCMS requirements is not ensured in the workshop*
* *some indicators are difficult to interpret*
* *certain indicators are not consistent with the objectives*

**5.2 Policy**

* *the business continuity policy is not updated*
* *the business continuity policy is not dated*
* *the business continuity policy is not signed by the director*
* *in the business continuity policy, there is a lack of possibilities to increase stakeholder satisfaction*
* *the business continuity policy is not posted outside the director’s office*

**5.3 Roles and responsibilities**

* *the roles and missions of managers are not well known or understood in the workshop*
* *the job description of the business continuity manager is not updated*
* *the responsibilities and authorities of the business continuity manager are not recorded*

**6 Planning**

**6.1 Risks**

* *certain stakeholder requirements are not taken into account when planning actions to address risks*
* *risk analysis does not take into account strategic issues*
* *no action planning to reduce negative impacts*
* *no opportunity to increase desirable effects*
* *threats and opportunities are not determined for certain processes*

**6.2 Objectives**

* *no objectives communicated*
* *some objectives are not measurable*
* *the objectives are not broken down into indicators*
* *non-existent dashboard*
* *no planned action to achieve business continuity objectives*
* *certain objectives are not monitored regularly*
* *planning does not include any criteria to evaluate the effectiveness of actions*

**6.3 Changes**

* *certain changes are applied without planning or analysis of the risk of potential nuisances*
* *the person responsible for a change is not known to the people concerned*
* *change applied without clearly established objective*

**7 Support**

**7.1 Resources**

* *financial resources are not released on time*
* *staff expectations are not identified*
* *the business continuity manager has neither deputy nor replacement*

**7.2 Competence**

* *missing skills are not listed*
* *some departments do not determine their training needs*
* *evaluation of the effectiveness of training is not carried out*
* *certain training courses were not evaluated either at the end of the session or later*
* *the annual training program is not updated (training planned but not provided)*

**7.3 Awareness**

* *no formalized document for raising awareness among new hires or staff of external providers*
* *new hires do not receive formal information on emergency preparedness*

**7.4 Communication**

* *complaints are not taken into account*
* *lack of communication plan*
* *the follow-up of actions following complaints are not transmitted to the stakeholder*

**7.5 Documentation**

* *the scope of the BCMS is not mentioned in any document*
* *some process sheets are incomplete*
* *very real activities are not identified in any document*
* *some documents are not codified*
* *documents are not approved before their distribution*
* *there are documents that are incomprehensible to staff*
* *documents are not where they are needed*
* *instructions are not updated (before the latest version)*
* *the protection of documents on the network is not defined*
* *documents of external origin are not controlled (codified)*
* *the retention period and disposal methods for documents are not determined*
* *no document prohibits the use of dangerous equipment (non-compliance with legal requirements)*
* *documents not kept until the date of their elimination*
* *business continuity meeting without recorded minutes*

**8 Operation**

**8.1 Planning and control**

* *process acceptance criteria are not clearly defined*
* *documents relating to processes are not kept*
* *temporary and permanent changes to processes are not controlled*
* *the consequences of changes are not analyzed*
* *corrective actions are not requested from faulty external providers*

**8.2 Business impact analysis**

* *resources for priority activities are not identified*
* *dependencies of priority activities are not determined*
* *risks are not subject to treatment measures*

**8.3 Strategies**

* *selected strategies have only one solution*
* *the selected solutions do not take into account certain critical activities*
* *resources are not planned for critical activities*
* *the cost of certain solutions is not realistic (too high)*

**8.4 Business continuity plans**

* *communication with stakeholders before and during a disruption is insufficient*
* *BCPs are not available*
* *the hierarchy of authorities of the crisis teams is not defined*
* *the communication procedure is incomprehensible to staff*
* *resources for BCPs are not available*
* *the restore activities process does not include IT recovery*

**8.5 Exercise program**

* *the program is not updated*
* *the program is with missing objectives*
* *the BCPs are verified only from a documentary point of view*
* *no improvement proposals are documented following the exercises*

**8.6 Evaluation**

* *the evaluation of certain parts of the BCMS is not carried out*
* *assessment results are not kept*
* *the training program is not evaluated*
* *the verification of all BCPs is not complete*

**9 Performance**

**9.1 Inspection**

* *decisions from the analysis of inspection results are not retained*
* *BCMS performance measures are not available*
* *monthly inspections of activities with impact on business continuity not kept*
* *inspection activities are neither defined nor planned*

**9.2 Internal audit**

* *the audit program is neither respected nor updated*
* *the audit program does not cover all the requirements of the ISO 22301 standard*
* *the list of internal auditors is not updated*
* *the scope of the audit falls within the responsibilities of the auditor*
* *audit report not retained*
* *the audit report does not contain any track for improvement or any action*
* *the action requested in the audit report is not implemented within the proposed deadline*
* *audit conducted by a trainee without sufficient skills and experience (and is not part of the list of auditors)*
* *the results of audits are not systematically proposed as an input to the management review*

**9.3 Management review**

* *follow-up of actions from the previous review is not presented*
* *the frequency of the chosen management review is not respected*
* *the level of achievement of objectives is not analyzed*
* *the state of current actions is not commented on*
* *no decision to change objectives and indicators*
* *decisions relating to improving the efficiency of the BCMS and processes are non-existent*
* *personnel and material resource requirements are not quantified*

**10 Improvement**

**10.1 Nonconformity**

* *certain opportunities for improvement are identified without any action being taken*
* *responsibility and authority for controlling nonconformities are not defined*
* *after the analysis of the causes no corrective action follows*
* *absence of analysis of the causes of nonconformities*
* *lack of evidence of elimination of the causes of nonconformities*

**10.2 Continual improvement**

* *proposed opportunities for improvement are not seized*
* *the results of the management review are not communicated to staff*