



Enterprise Business Continuity Management Support Services
Enterprise Operations, Technology & Operations
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Transit #0604

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Subject: AMF – Business Continuity Management, offer for comments

RBC has reviewed the above-mentioned document dated June 2009 and offers the following comments: In general, it would be important to ensure the AMF document aligns more completely with the Basel Committee on Banking Supervision Joint Forum on High-level principles for Business Continuity dated August 2006. This is a thorough and well written document. In addition:

Principle 1 – Responsibility of senior management and the board of directors:

Reference: “*In this regard, the board of directors would notably: ...approve the BCP ..*”

- The Board of Directors should be involved in endorsing a business continuity **program**.
- Senior Management would be responsible for:
 - managing the business continuity program
 - tactical activities such as building, approving and exercising continuity **plans** as well as managing unplanned incidents
- There should be a clear distinction between governance and tactical activities.

Principle 3 – Identification of major operational incidents:

Reference: “*A financial institution should therefore identify the range of incidents likely to affect it and assess their impact on its risk profile.*”

- Existing enterprise risk management practices already identify risks, probable threat scenarios and loss events. The business continuity program should leverage this information.
- Identification of potential operational incidents should be done at the corporate level because the impact could affect other operational risks and not just business continuity.

Principle 6 – Business Continuity Planning:

No reference, general comments only

- Appropriate levels of service and/or minimum levels of service must be established for mission-critical functional areas or process groups.
- There is no reference to the use of key risk indicators which are increasingly seen as important tools in managing operational risk.
- In large, diversified companies there would be the need for multiple business continuity plans. One single plan would either be unwieldy and too difficult to maintain or be too concise and of limited value.
- The scope of recovery sites should be broadened to include the emerging feasibility of remote computing (working from home).

In closing, it may be worthwhile to include a last principle – **Emergency Response and Incident Management** as they relate to the business continuity program.

Regards,

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