



TLT Policy

Business Continuity Management System (BCMS)

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Document version control

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0.2	Jon Green	12 November 2018	Changes made to the dates of implementation and certification.
1.0	Jon Green	30 November 2018	Approval Manager changed to Jon Green. Owner changed to Risk and Compliance. Uploaded to library.
2.0	Katja Hui Zhang	24 February 2020	<p>In line with ISO22301 requirements</p> <p>Added three sections:</p> <ul style="list-style-type: none"> • characteristics of TLT; • interested parties and expectation; • Appendix A – BCMS Policy Checklist in line with ISO22301 standards <p>Amended five sections:</p> <ul style="list-style-type: none"> • amended the policy name from "Business Continuity Management" to "Business Continuity Management System (BCMS) Policy"; • BCMS Objectives; • Scope; • leadership, roles and responsibilities; • information security level of the policy from "Confidential" to "Public" <p>Removed one section:</p> <ul style="list-style-type: none"> • review and maintenance from current policy into the BCMS Manual
2.1	Katja Hui Zhang	18 August 2020	Amendments made in line with BSI update from ISO22301:2012 to ISO22301:2019
2.2	Katja Hui Zhang	10 November 2020	<p>Added on location addresses</p> <p>De-scope Cardiff location due to changes to business</p>

2.3	Hannah Hogan	9 December 2020	Removal of further content relating to Cardiff location
3.0	Katja Hui Zhang	19 January 2021	Added the Legislation section back to BCMS policy. TLT risk appetite and risk acceptance criteria section; and context of the organisation section. Update responsibilities for key roles as part of continual improvement.
4.0	Katja Hui Zhang	15 April 2021	Addressed the detailed BC objectives and Plan in BCMS policy, in line with ISO22301 requirements. Addressed the planning changes to the BCMS in BCMS policy, in line with ISO22301 requirements. Added the non-compliance escalation section.
5.0	Lois Hinchliffe DLS	13 July 2022	Annual review and update business continuity objectives. Document rebranded
6.0	Carl Yeomans	26 July 2023	Annual review

1 Purpose

- 1.1 TLT is committed to ensuring that measures are in place to protect its employees and to enable it to recover its critical business functions and the services it provides to clients within an acceptable time frame, should a disruptive event occur. This will allow TLT to continue to fulfil its statutory obligations and its commitments to clients and other stakeholders.
- 1.2 This document outlines the policy framework through which TLT will develop and maintain its UK Business Continuity Management System (**BCMS**), in line with accepted standards for Business Continuity Management (**BCM**):
 - 1.2.1 International Standard ISO22301:2019 Societal security – Business continuity management systems – Requirements;
 - 1.2.2 British Standards BS22301:2019;
 - 1.2.3 International Standard ISO22313:2019(E) Societal security – Business continuity management systems – Guidance;
 - 1.2.4 British Standards BS22313:2019;
 - 1.2.5 ISO/IEC 27001:2013 Information technology – Security techniques – Information security management systems – Requirements [●business continuity provisions only].

2 Characteristics of TLT

- 2.1 TLT delivers expert legal advice innovatively, efficiently and cost-effectively. The firm has leading strengths in the financial services and leisure sectors as well as in depth experience within the retail and consumer goods, technology and media, renewables, housing and public sectors. TLT provides specialist expertise in banking, commercial, finance, litigation, employment, IT, real estate and international trade. Many of TLT's lawyers are identified as experts in their respective fields by independent guides to the legal market.
- 2.2 TLT LLP and TLT NI LLP (a separate practice in Northern Ireland) operate under the TLT brand and are together known as TLT. TLT has over 100 partners, approximately 1000 employees and a UK-wide presence with offices in Bristol, London, Manchester, Glasgow, Edinburgh, and Belfast.
- 2.3 The firm's presence in Scotland and Northern Ireland gives TLT the capability to deliver seamless legal advice across all three UK legal jurisdictions.

3 Context of the organisation

- 3.1 TLT actively review and consider any internal and external concerns that might affect the BC Management System and its ability to achieve the intended outcomes of its BCMS.
- 3.2 A separate Risk and Risk Management Strategy framework has been embedded in TLT to oversee TLT Strategic Risk, Operational Risk, Regulatory Risk, and Information/Cyber Security etc.
- 3.3 This includes, Risk Management Strategy Policy, Risk register, and the Risk and Compliance Committee.

4 BCMS objectives

- 4.1 The overall objectives of TLT's Business Continuity Management System (BCMS) are to protect the interests of our Clients, Employees, Partners and other Stakeholders and to react proactively to reduce the likelihood and impacts from business disruptions.

- 4.2 The TLT LLP BCMS's objectives and commitment to:
- 4.2.1 comply with applicable legal requirements and with other requirements to which the organization subscribes;
 - 4.2.2 integrate BCMS processes into the organization's established maintenance and review procedures;
 - 4.2.3 establish business continuity policy and detailed objectives in line with the objectives, obligations and strategic direction of the organization;
 - 4.2.4 appoint Business Continuity Management leaders with the appropriate authority and competencies to be responsible for the BCMS and accountable for its effective operation;
 - 4.2.5 ensure that BCMS roles, responsibilities and competencies are established;
 - 4.2.6 ensure the availability of sufficient resources, including appropriate levels of funding;
 - 4.2.7 communicate to the organization the importance of fulfilling business continuity policy and objectives;
 - 4.2.8 actively engage in exercising and testing;
 - 4.2.9 ensure that internal BCMS audits are conducted;
 - 4.2.10 conduct effective management reviews of the BCMS;
 - 4.2.11 direct and support improvement of the BCMS;
 - 4.2.12 support operational involvement through TLT Risk and Compliance steering committee and Business Continuity Forum etc; and
 - 4.2.13 to achieve certification against ISO22301:2019.

5 Scope

- 5.1 The BCMS will apply to TLT's activities at all of its UK operating locations.
See Appendix C for individual locations and teams.
- 5.2 The exclusions are:
- 5.2.1 Piraeus office and its business activities; and
 - 5.2.2 any third party hosted systems outside TLT's control eg HighQ Collaborate, LegalSifter, and main publisher platforms like Lexis Nexis, Westlaw and PLC.
- 5.3 TLT liaises with its key suppliers to confirm that adequate business continuity arrangements are in place to safeguard the continued provision of the key products and services it receives.
- 5.4 Consideration will be given to business continuity implications as part of any strategic or project-based planning activities.

6 Principles

- 6.1 TLT's BCMS programme will establish a consistent process to ensure that TLT can:
- 6.1.1 respond in a controlled way to an unplanned disruption affecting normal operations;
 - 6.1.2 maintain the continuity of its time-critical business activities and client services.

- 6.2 The BCMS process includes the assessment of risk, and the implementation of appropriate risk treatment measures. TLT also identify opportunities and seek for continual improvement via this process. The risk treatment and continual improvement are registered in business continuity objective register in Appendix B and Appendix C.
- 6.3 TLT identify and maintain an understanding of its priority business activities and services, based on the potential business impacts (financial, service delivery, legal or reputational) that would be likely to occur if those activities are disrupted.
- 6.4 The BCMS programme will incorporate strategies to recover time-critical business activities and services in line with client expectations and service level agreements following a business disruption.
- 6.5 The BCMS programme will be amended in line with material changes in the business. The changes will be carried out in a planned manner by considering:
 - 6.5.1 the purpose of the changes and their potential consequences;
 - 6.5.2 the integrity of the BCMS;
 - 6.5.3 the availability of resources;
 - 6.5.4 the allocation or reallocation of responsibilities and authorities.
- 6.6 The BCMS will contain as a minimum:
 - 6.6.1 the response and business recovery actions for TLT's activities;
 - 6.6.2 a call cascade and contact details for staff;
 - 6.6.3 contact details for clients and other key stakeholders;
 - 6.6.4 an incident management process, focused on:
 - (a) contacting staff and key stakeholders in an emergency;
 - (b) maintaining the safety of TLT staff, visitors and the public;
 - (c) invoking business recovery arrangements and plans to recover business activities and services within an acceptable timeframe.

7 Non-compliance escalation

Incident of non-compliance will be reported to BCP Forum. If it cannot be resolved, it will be escalated to Operations Board and Risk and Compliance Committee as necessary.

8 Leadership, roles and responsibilities

- 8.1 The Operations Board is responsible for:
 - 8.1.1 ensuring compliance with this policy;
 - 8.1.2 evaluating the effectiveness of the BCMS;
 - 8.1.3 ensuring appropriate resources are available;
 - 8.1.4 reviewing BCMS objectives on an annual basis;
 - 8.1.5 ensuring that the Operations Director and Risk Director review the BCMS on an annual basis;
 - 8.1.6 reporting current status and any recommendations for improvement to the Executive Board;

- 8.1.7 communicating the BCMS and this policy to TLT;
- 8.1.8 provide feedback to ensure continuous improvement of the BCMS.
- 8.2 The Risk Director leads BCMS, allies with the other Business Services Directors and reports to the Operations Board and Risk and Compliance Committee (**RACC**). The Risk Director motivates and empowers resource and personnel to implement, develop, manage and maintain TLT's BCM capability to contribute to the effectiveness of the BCMS, including:
 - 8.2.1 incident management process;
 - 8.2.2 coordination of business recovery plans and recovery arrangements;
 - 8.2.3 testing and exercise programme;
 - 8.2.4 review, maintenance and audit processes;
 - 8.2.5 training and awareness to include:
 - (a) all partners and staff will receive training on the requirements of the BCP, including:
 - (i) regular training for existing partners and staff;
 - (ii) training for new partners and staff at induction;
 - (iii) updates following any changes to the BCP;
 - 8.2.6 focused training for individual partners, staff or CMT responsible for dealing and responding to BCP incidents/events;
 - 8.2.7 appointing appropriate individuals to be members of one or more of the Crisis Management Teams (**CMTs**);
 - 8.2.8 provide feedback to ensure continuous improvement of the BCMS.
- 8.3 The Head of Information and Cyber Security is responsible for ensuring information security is considered in the planning, implementation and verification phases of the BCMS.
- 8.4 The Business Continuity Officer, acts as the TLT BC Lead Auditor, is responsible for ensuring sufficient monitoring, measurement, analysis and performance evaluation processes are in place to meet both TLT BCMS and ISO22301:2019 requirements.
- 8.5 The Business Continuity Forum oversees TLT's BCMS, BCPs and their performance to ensure its continuing suitability, adequacy and effectiveness and ensure all on-going outstanding actions are completed.
- 8.6 Each Group Leader is responsible for:
 - 8.6.1 ensuring that the content of the plan (including call cascades) remains current, and copies are distributed to designated plan holders;
 - 8.6.2 participating in tests and exercises to ensure the validity of recovery plans and arrangements;
 - 8.6.3 implementing business recovery plans and arrangements following a business disruption event (as advised by the relevant Crisis Management Team);
 - 8.6.4 contributing to business impact assessments and minimum resource requirements;
 - 8.6.5 assessing and escalating business risks and any incidents of non-compliance;
 - 8.6.6 ensuring that staff resource is available to carry out business continuity activities within the department as required;

- 8.6.7 status reporting;
- 8.6.8 provide feedback to ensure continuous improvement of the BCMS.
- 8.7 Members of the CMTs should:
 - 8.7.1 undertake any training provided to enable them to fulfil their role as a CMT member;
 - 8.7.2 participating in tests and exercises to ensure the validity of recovery plans;
 - 8.7.3 respond to any notification of a business interruption;
 - 8.7.4 implementing business recovery plans following a business interruption in accordance with their defined role in the BCMS;
 - 8.7.5 provide feedback to ensure continuous improvement of the BCMS;
 - 8.7.6 assessing and escalating business risks and any incidents of non-compliance.
- 8.8 All partners and staff should:
 - 8.8.1 familiarise themselves with the Policy and any appropriate guidance or procedures for their group;
 - 8.8.2 undertake any training provided;
 - 8.8.3 participate in tests and exercises including responding to text alert tests;
 - 8.8.4 be alive to potential incidents and report them in accordance with instructions given;
 - 8.8.5 provide feedback to ensure continuous improvement to the BCMS;
 - 8.8.6 assessing and escalating business risks and any incidents of non-compliance.

9 Interested parties

- 9.1 These are TLT's core/primary interested parties. The list of all interested parties is reviewed upon the annual review of this policy. Any changes are communicated to the Business Continuity Forum as appropriate. The BCMS policy has been defined to be available to all interested parties listed.

9.2

Interested parties	Requirements
Partners	expect that industry best practice certifications are maintained to provide assurance to the board; expect to be made aware of their compliance requirements and obligations related to TLT business continuity
Client Facing Employees	expect to be made aware of their compliance requirements and obligations related to TLT business continuity
Non-Client Facing Employees	expect to be made aware of their compliance requirements and obligations related to TLT business continuity

Interested parties	Requirements
Clients	expect to have their business and assets protected from business continuity perspective; expect to receive services that are driven to their best interest in accordance with the terms agreed with them at the outset and as amended from time to time; client specific interests are held by the relevant Client Development Manager
Other Parties	expect to be made aware of their compliance requirements and obligations related to TLT business continuity
Prospective Clients	expect to have a clear understanding of how their business and assets will be protected from business continuity perspective
Contractors	expect to be made aware of their compliance requirements and obligations related to TLT business continuity
Suppliers	expect to be made aware of their compliance requirements and obligations related to TLT business continuity
Auditors	expect to be presented with all the information required to enable them to carry out an effective audit
Company Solicitors/Lawyers	expect to be presented with all the business continuity information required to enable them to provide advice to the business
Executive Board/Partnership Council	expect to have relevant and accurate business continuity information to allow them to determine strategies, proactively manage critical risks and effectively allocate resource as appropriate
Regulatory Bodies	expect that they are co-operated with and provided with all information to meet TLT's reporting and notification requirements from business continuity management perspective
Courts	expect that they are not deceived or knowingly or recklessly misled and that the rule of law and proper administration or justice is upheld
Bank	expect that accounts are managed in such a way as to maximise the protection of client money and assets from business continuity management perspective
Competitors	expect to be treated in a manner which promotes the proper operation of the legal

Interested parties	Requirements
	system from the business continuity perspective
The Media	expect to be treated in a manner which promotes the proper operation of the legal system from the business continuity perspective

10 Legislation and regulatory requirements

10.1 TLT is obliged to abide by all relevant UK and European Union legislation and regulatory requirements. Please find below an indicative list of some of the UK and European legislation and regulations that TLT must be compliant with:

- 10.1.1 SRA Standards and Regulations and Code of Conduct;
- 10.1.2 Law Society of Scotland;
- 10.1.3 Law Society of Northern Ireland;
- 10.1.4 money laundering (anti-money laundering) regulations;
- 10.1.5 Criminal Finance Act 2017;
- 10.1.6 FCA Handbook of rules and guidance;
- 10.1.7 General Data Protection Regulation (EU) 2016/679/Data Protection Bill 2018;
- 10.1.8 Payment Card Industry (PCI) Data Security Standards (DSS);
- 10.1.9 The Copyright, Designs and Patents Act (1988);
- 10.1.10 The Computer Misuse Act (1990);
- 10.1.11 information security management - ISO 27001;
- 10.1.12 quality management - ISO 9001;
- 10.1.13 Fraud Act 2006;
- 10.1.14 Bribery Act 2010;
- 10.1.15 Public Interest Disclosure Act 1998 (PIDA) - Whistleblowing;
- 10.1.16 HM Treasury Financial Sanctions;
- 10.1.17 The Health and Safety at Work Act (1974);
- 10.1.18 Human Rights Act (1998);
- 10.1.19 Regulation of Investigatory Powers Act 2000;
- 10.1.20 Equality Act 2010.

11 TLT risk appetite and risk acceptance criteria

11.1 In accordance with major client SLAs, TLT has a low appetite for risk, including business continuity related risks.

- 11.2 Therefore, all appropriate measures are taken to achieve a high level of risk awareness alongside rigorous risk management. The risk measurement and risk acceptance criteria have been defined and documented in Risk methodology file.

Appendix A – BCMS Policy Checklist in line with ISO22301 standards

Ref	Additional ISO22301 BCMS policy requirements per Clause 5.3	Update and status
1	Be available as documented information	Effective and on-going
2	Be communicated within the organisation	Effective and on-going
3	Be available to interested parties, as appropriate	Effective and on-going
4	Be reviewed for continuing suitability at defined intervals and when significant changes occur	Effective and on-going
5	TLT retain documented information on the business continuity policy	Effective and on-going

Appendix B – 2024 Business continuity objectives

Objective	Activities	Target date	Action owner	Update
Continuation of team based BCPS	1 Produce Template 2 Consider CI and Business change 3 Trial with BLSG 4 Roll out across all teams		Carl Yeomans	
Carry out self-assessment of the TLT BCMS	1 Devise assessment matrix 2 Obtain stakeholder view 3 Produce plan for maturity		Carl Yeomans	
Training and Exercising	1 Produce an exercise plan 2 Run CMT Training/Exercise 3 Run Teams BCP exercises/awareness sessions		Carl Yeomans	
Develop a risk based controls and measure matrix	1 Review risks 2 Agree controls 3 Put in place KPIs for measuring performance		Carl Yeomans	

Appendix C – Locations

- 1 TLT London address: TLT LLP 20 Gresham Street London EC2V 7JE United Kingdom, accommodating teams across the firm.
- 2 TLT Belfast address: TLT LLP River House 48-60 High Street Belfast BT1 2BE United Kingdom, accommodating teams across the firm.
- 3 TLT Bristol address: TLT LLP 1 Redcliff Street Redcliffe Bristol BS1 6TP United Kingdom, accommodating teams across the firm.
- 4 TLT Glasgow address: TLT LLP 9th Floor 41 West Campbell Street Glasgow G2 6SE United Kingdom, accommodating teams across the firm.
- 5 TLT Edinburgh address: TLT LLP 3rd Floor Hobart House 80 Hanover Street Edinburgh EH2 1EL United Kingdom, accommodating teams across the firm.
- 6 TLT Manchester address: TLT LLP 3 Hardman Square Manchester M3 3EB United Kingdom accommodating teams across the firm.
- 7 TLT Birmingham address: TLT LLP 4th Floor Two Chamberlain Square Birmingham B3 3AX United Kingdom accommodating teams across the firm.

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