

CLIENT CASE STUDY

Insurance Sector	19 weeks Engagement Duration	Operational Resilience Primary Obligation	BCRP Programme Engagement Outcome
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From Centralised Plans to Business-Owned Resilience: Refreshing Business Continuity Recovery Planning for a UK Insurer

CLIENT SITUATION

Foresters Financial is a UK-regulated insurer subject to dual regulation by the PRA and FCA. The firm had maintained a sustained focus on operational resilience compliance, having progressed through the foundational requirements of its programme - identifying important business services (IBS), setting impact tolerances, mapping IBS-dependent resources, and conducting severe but plausible scenario testing. A mature ICT Service Continuity framework had also been developed to ensure technology resources supporting IBS were managed through robust continuity arrangements.

As part of its continued investment in resilience maturity, Foresters Financial identified the need to refresh its Business Continuity Recovery Planning (BCRP) capability. The firm had developed a centralised recovery plan, but recognised that this approach - whilst providing a documented baseline was not adequately embedded within business departments and lacked sufficient alignment with the broader operational resilience framework, impact tolerances, and crisis and incident management processes.

The resilience function faced a practical delivery challenge: to transition from a single, organisation-wide continuity document to a structured set of departmental recovery plans that could genuinely support the firm's ability to remain within impact tolerances during disruption, with ownership and accountability embedded at the department level

The firm had a resilience framework. What it did not yet have was a tested, department-level recovery capability that could credibly demonstrate continuity across its important business services. PRA SS1/21 and FCA operational resilience policy are explicit: firms must be able to demonstrate they can remain within impact tolerances across the full range of disruption scenarios - and that requires credible, operationally owned recovery plans, not a single central document

The Regulatory Pressure Point

The PRA and FCA operational resilience framework - set out in SS1/21 and the FCA's rules under SYSC 15A - requires firms to demonstrate resilience across people, processes, technology, and third parties. From the March 2022 implementation deadline, firms were required to have identified their IBS and set impact tolerances. The March 2025 deadline established the ongoing expectation: firms must demonstrate they can remain within those tolerances through disruption, supported by tested continuity and recovery capability. Business continuity recovery planning is not an optional component of an operational resilience framework - it is the mechanism through which a firm operationalises its resilience commitments. A centralised recovery plan, held at organisational level rather than embedded within the departments responsible for delivering IBS-supporting processes, does not provide regulators - or the firm's own board - with credible evidence of recovery capability.

For Foresters Financial, the path from a well-structured foundational programme to a genuinely demonstrable resilience posture required a structured refresh of recovery planning capability, with departmental ownership embedded and validated through structured testing.

Operational Resilience Challenge

The organisation needed to transition from a single central recovery plan to a structured set of departmental recovery plans, aligned with IBS mapping, impact tolerances, and operational resilience processes. Twelve departments were in scope - including business functions and ICT teams - each requiring tailored recovery procedures that reflected their specific process priorities, resource dependencies, and recovery objectives.

Gap 1 — Centralised recovery planning

Existing recovery plans were held centrally and not embedded within business departments. Department leads had limited ownership of recovery procedures, and the single-plan approach lacked the granularity needed to support effective, timely recovery of the diverse range of processes supporting important business services.

Gap 2 — Alignment with operational resilience

Business continuity recovery plans had not been formally aligned with IBS mapping, impact tolerances, or maximum tolerable periods of disruption (MTPDs). Without this alignment, there was a material risk that recovery procedures would not support the firm's ability to remain within its IBS impact tolerances during a live disruption event.

Gap 3 — Exercising and validation

Recovery procedures had not been tested through structured exercises. Without exercise evidence, the firm could not demonstrate - to itself, to its board, or to a regulator - that recovery capability was operationally credible rather than theoretically documented.

Approach Taken

FourthLine mobilised a senior delivery team with direct prior knowledge of Foresters Financial's operational resilience framework, having supported the firm through earlier phases of its compliance programme. A structured, four-phase engagement was designed and mobilised, with defined deliverables and client approval gates between each phase.

Phase 1 — Establish and Enable (~4 weeks)

FourthLine conducted a light-touch review of existing business continuity management, operational resilience, and crisis and incident management documentation to assess current maturity. Roles and responsibilities were defined and communicated across departments through structured awareness sessions. The engagement scope and maturity objectives were agreed with senior management, and the recovery planning architecture - aligning the central BC framework, departmental recovery plans, ICT continuity plans, and crisis management - was confirmed and communicated.

Phase 2 — Assessment (~5 weeks)

An operational Business Impact Analysis (BIA) was conducted across all twelve departments. FourthLine combined upfront BIA training walkthroughs with departmental offline completion and follow-up validation sessions - an approach designed to build genuine department ownership rather than producing consultant-authored outputs. Impact tolerances and MTPDs were reviewed and agreed with senior management. Process priorities, resource dependencies (people, facilities, technology, suppliers, and information), and recovery objectives were captured and documented in a BIA summary report for executive review.

Phase 3 — Implementation (~5 weeks)

Departmental business continuity recovery plans were developed across all in-scope departments, with department leads taking responsibility for documentation - supported by FourthLine through structured training, template guidance, and checkpoint reviews. Plans were aligned with operational resilience processes and IBS mapping, ensuring recovery procedures were directly linked to the firm's impact tolerance commitments. An Organisational Business Continuity and Crisis Management Plan also produced serving as the central governance document.

Phase 4 — Exercise and Validation (~5 weeks)

The exercise programme validated recovery capability at two levels: individual department tabletop exercises tested each department's recovery plans and identified gaps and overlaps; a cross-departmental crisis scenario then tested end-to-end coordination and communications across functions and ICT teams. All lessons learned were incorporated into final plan revisions, and a consolidated findings and recommendations report was produced.

<p>Business-Owned Recovery Foresters Financial transitioned from a single centralised continuity plan to a set of departmental business continuity recovery plans, with ownership and accountability embedded at department level.</p>	<p>Operational Resilience Alignment Recovery plans were aligned with IBS mapping, impact tolerances, and MTPDs, creating an integrated resilience framework capable of supporting continuity of important business services during disruption.</p>	<p>Validated Recovery Capability Tabletop exercises validated recovery procedures across all departments and a cross-departmental crisis scenario tested end-to-end coordination. Lessons learned were incorporated into final plan revisions.</p>
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Engagement Outcome
FourthLine supported Foresters Financial to move from a centralised business continuity framework to a business-owned, operationally embedded recovery capability — aligned with its operational resilience programme and validated through structured departmental and cross-department exercises.

About FourthLine
FourthLine is a specialist operational resilience and regulatory risk consulting firm. We serve mid-tier UK financial services firms regulated by the FCA and PRA, delivering board-ready, regulator-facing resilience evidence faster, more expertly, and at a fraction of Big Four cost. Our clients include insurers, banks, investment managers, building societies and payments firms.

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