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ISO 22301:2019 mapped to APRA CPS 230

Each operational risk obligation against the clause that satisfies it

CPS 230 does not name ISO 22301, but it requires exactly what a BCMS produces: critical operations, tolerance levels for disruption, testing, and service provider management. Always confirm against the current prudential standard — APRA standards are amended periodically and paragraph numbering changes.

CPS 230 OBLIGATION	WHAT APRA REQUIRES	ISO 22301 CLAUSE	WHAT THE BCMS PRODUCES	EVIDENCE TO RETAIN
Critical operations	Identify the operations that, if disrupted, would have a material adverse impact on depositors, policyholders, beneficiaries or the financial system	Clause 8.2.2 — business impact analysis	The BIA, which identifies activities by impact rather than by system	BIA with named activities, owners and impact assessments over time
Tolerance levels	Set tolerance levels for the maximum period of disruption, maximum data loss and minimum service level for each critical operation	Clause 8.2.2 — MTPD, RTO, RPO and MBCO	Exactly these four figures, per activity	Tolerance register reconciled to the BIA, board-approved
Business continuity plan	Maintain a BCP that documents how critical operations will be maintained within tolerance	Clause 8.4 — business continuity plans and procedures	The BCP and its supporting recovery procedures	Current BCP with a review date inside the last 12 months
Testing	Systematically test the BCP annually at minimum, including severe but plausible scenarios	Clause 8.5 — exercise programme	An exercise schedule with escalating scenario difficulty	Exercise reports with actual recovery times against tolerance
Board oversight	The board is ultimately accountable for operational risk management and must approve the tolerance levels	Clause 5 — leadership and commitment	Documented management commitment and defined accountability	Board minutes approving tolerance levels and the BCP
Service provider management	Identify material service providers, assess their ability to deliver, and manage the risk of their failure	Clause 8.3 — business continuity strategies and solutions	Supplier dependency analysis and continuity requirements	Material service provider register with continuity assessments
Notification to APRA	Notify APRA within 72 hours of a disruption to a critical operation beyond tolerance	Clause 8.4.2 — communication and warning	The notification matrix with thresholds and timeframes	Notification procedure naming APRA and the 72-hour trigger
Incident management	Maintain processes to identify, escalate, record and address operational risk incidents	Clause 8.4 — incident response structure	Activation criteria, incident management team and escalation path	Incident register with escalation evidence and close-out
Scenario analysis	Use severe but plausible scenarios to assess whether tolerance levels can be met	Clause 8.5 — exercise scenarios	Scenario-based exercises rather than walkthroughs alone	Scenario library with the rationale for severity selection
Risk assessment	Assess operational risks including those arising from people, processes, systems and external events	Clause 6.1 — actions to address risks and opportunities	Risk assessment feeding the continuity strategy	Risk assessment linked to the BIA and the treatment decisions
Review and improvement	Review the operational risk framework regularly and after material incidents	Clauses 9 and 10 — evaluation and improvement	Management review, internal audit and post-incident review	Management review minutes and the findings register with closures
Documentation	Maintain documentation sufficient to demonstrate compliance	Clause 7.5 — documented information	The full BCMS document set under version control	Document register with version history and approval records

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