

# Operational resilience: From documentation to delivery

Closing the gap between compliance and crisis response

Michela Carloni Gammon | Everbridge



## ● SETTING THE STAGE — THE PROBLEM

# The documentation exists. The operating connection does not.

## - decision latency is created in the handoffs

Three worlds inside an organisation do not talk to each other, so the clock runs before anyone looks

### Detection & people safety

Critical-event platform: physical events, facilities, staff safety, communications.

*e.g. Everbridge*

### Digital incident response

ITSM plus an on-call / major-incident tool; application teams work incidents in their own silos.

*e.g. xMatters wired to ServiceNow ITSM*

### Resilience & compliance

IBS list, tolerances, mapping and the annual self-assessment — in documents, spreadsheets and GRC records.

*Refreshed on a calendar, not by events*

### THE OPERATIONAL GAP

- 1 Mapping is static, technology-heavy and goes stale.
- 2 Incidents and resilience are siloed; physical and digital tools "flip-flop".
- 3 Nobody can prove they stayed within tolerance.
- 4 Scenario tests are paper exercises that pass.
- 5 The self-assessment is reconstructed by hand.
- 6 Deadlines are missed: the clock starts before the crisis team knows.

### FCA, MARCH 2026 — ON SELF-ASSESSMENTS

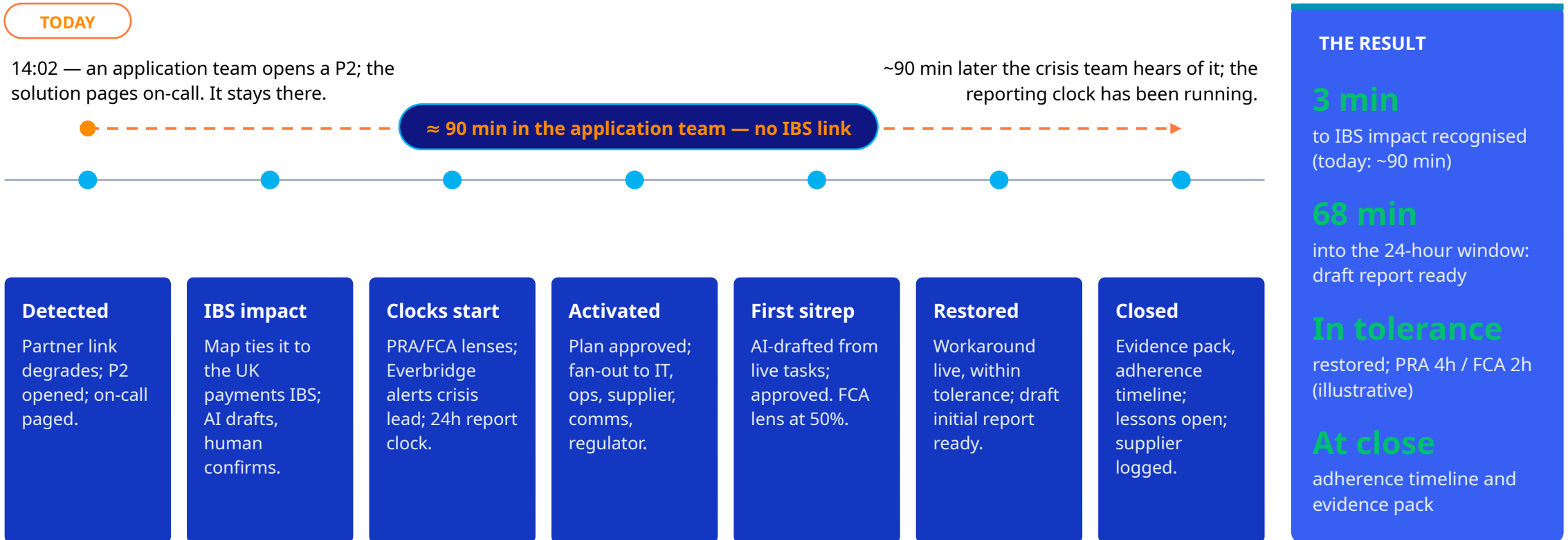
"vague, insufficiently evidenced, overly high level"

# 27%

of incidents reported to the FCA in 2025 were third-party attributed (regulators, July 2026)

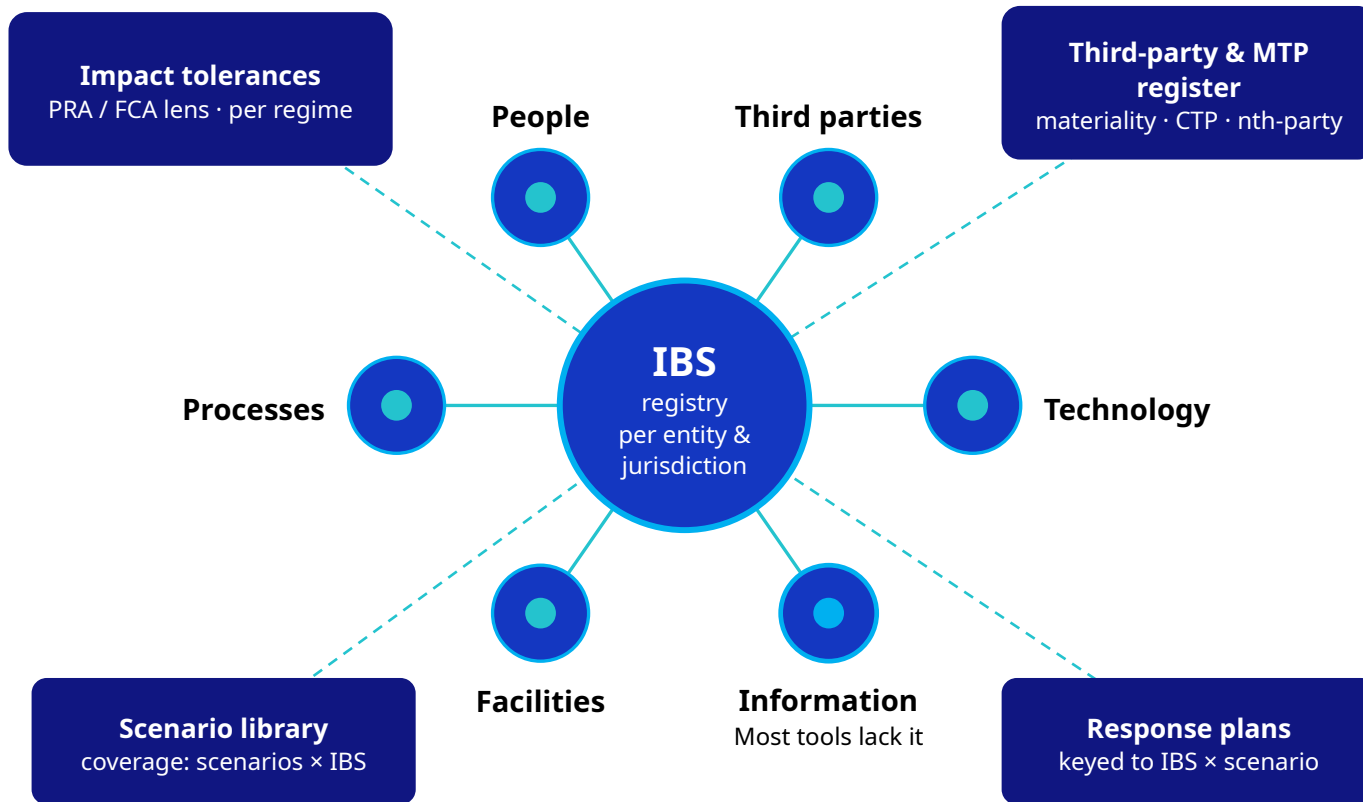
# A bad day, digital and third-party: replayed

IBS impact recognised in three minutes, not ninety; regulator report drafted inside the clock



# Map: one live model that everything reads from

IBS, tolerances, six pillars, third parties, scenarios and plans — owned, verified, fresh



## What makes it live

- **Owner, last-verified, freshness** — on every resource; stale entries are visible.
- **Import and change detection** — from CMDB/CSDM, HR, facilities, vendor systems and spreadsheets.
- **Under-mapped pillars surfaced** — so technology-only mapping shows.
- **Familiar objects** — mirrors ServiceNow's operational-resilience objects and syncs where the bank has them.

**Platform-native** — resources reference platform objects (CI, service, user, location, company) or native records.

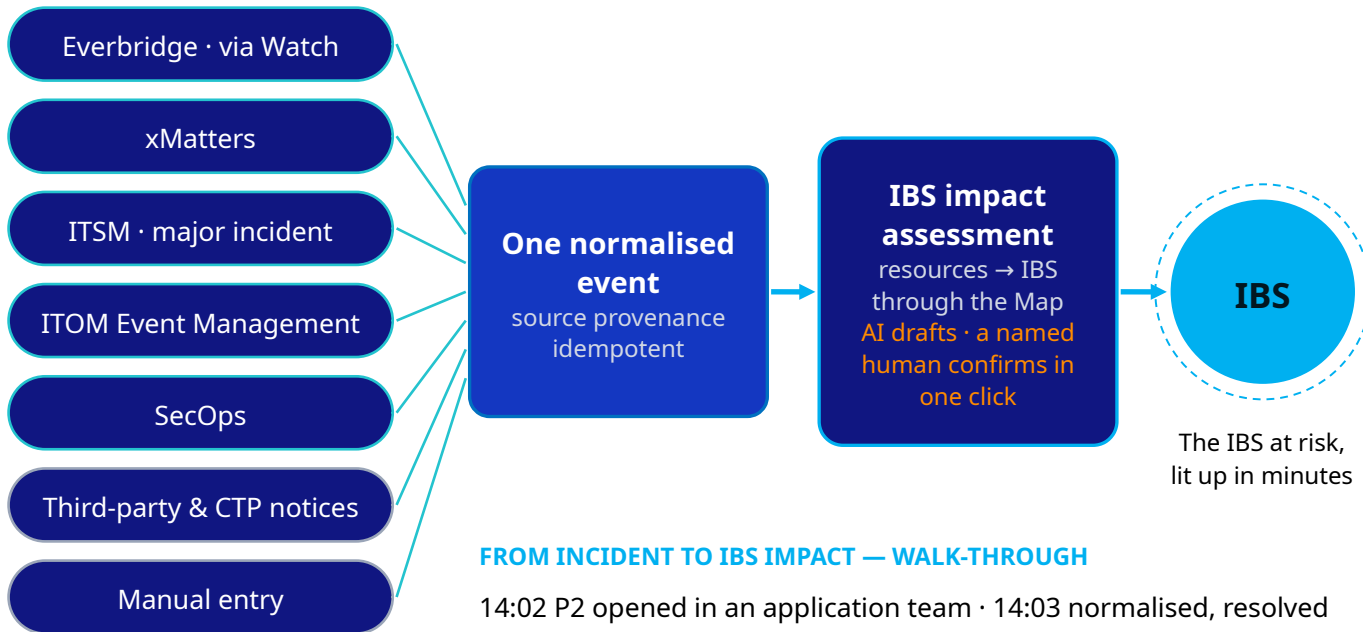
Principles 1 · 5 · 7

**Anchors** SS1/21 ch.2-5 · SYSC 15A · SS2/21 · R-A1-R-A7

# Detect: any event, resolved to the service it threatens

Within minutes the system knows which IBS is at risk and whether a tolerance is threatened

## SOURCES



## FROM INCIDENT TO IBS IMPACT — WALK-THROUGH

14:02 P2 opened in an application team · 14:03 normalised, resolved to UK domestic payments · 14:05 clocks start — not an hour and a half later.

## Cross-silo by design

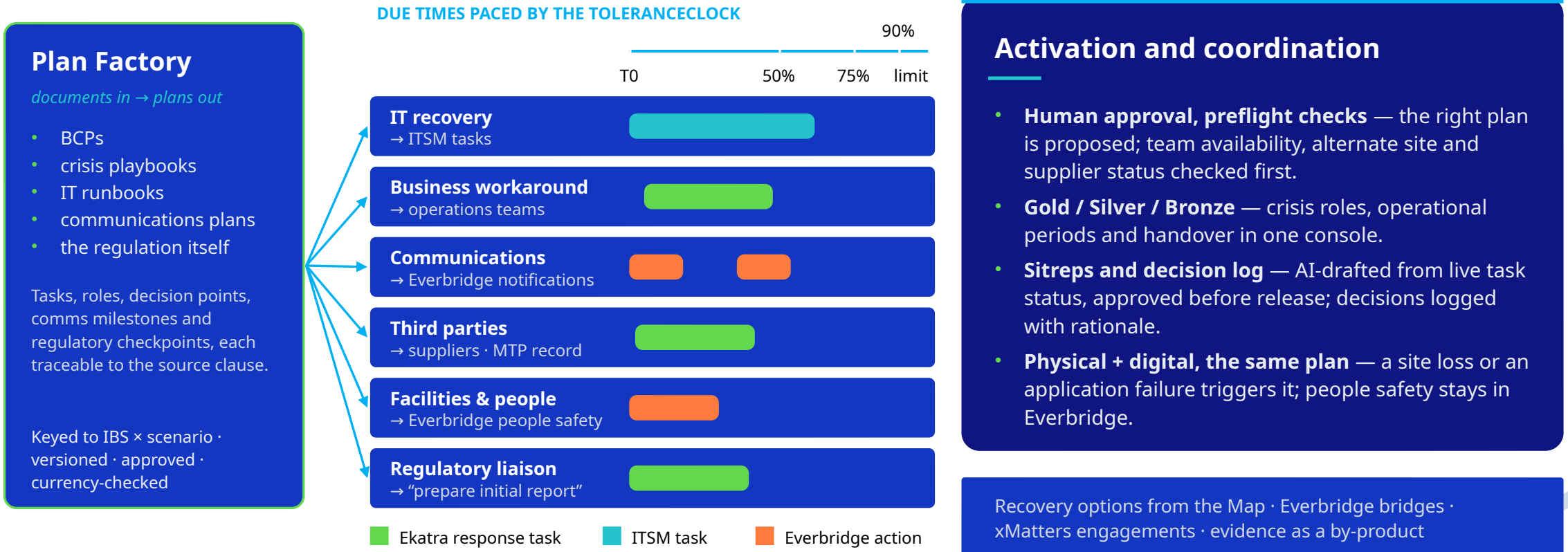
- **Visible at creation, not at escalation** — any incident touching a mapped IBS resource is seen by OpRes and crisis management the moment it is raised.
- **One record, any source** — idempotent, with provenance; an Everbridge site event and an xMatters P2 land in the same model.
- **Assessment recorded** — the AI reasoning and the named confirmer are kept as evidence.

*“The application-team silo cannot hide an IBS impact.”*

The pain point, answered at the source

# Act: dynamic response plans across every silo

Documents become executable plans; tasks fan out to every function, paced by the clock



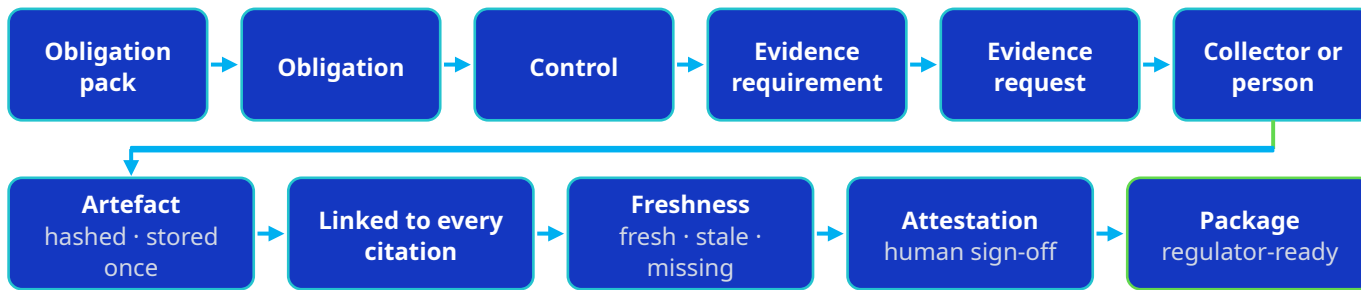
Principles 2 · 3 · 6

Anchors SoP 1/21 §4 · SYSC 15A.8 · SS1/21 §6.1 · R-A5, R-C1-R-C4, R-C7

# Prove: evidence as a by-product, proof on quiet days

Two sources of proof, one evidence trail — during a response and between responses

THE EVIDENCE CHAIN · UK PACK FIRST, THEN DORA, CPS 230, MAS, HKMA



## COLLECTORS

- Read-only connectors: CMDB, ITSM, change, identity, monitoring, vendor, BCM/GRC
- Manual upload, file drop or API pull where nothing is integrated
- Integrations view: health, coverage

Principle 4 · works alongside silos

## TWO SOURCES OF PROOF

**During a response** — every action, decision, communication and timestamp becomes evidence linked to IBS, clock, plan step and obligation.

**Between responses** — obligations define what evidence is needed, from where and how often; collectors and people gather it.

## Outputs

- Adherence timeline and evidence pack per disruption or test
- Regulator reports — initial, intermediate, final — drafted from live data; the bank submits
- Auditor and regulator read-only views
- Self-assessment from live data, evidence-linked, diffed vs last year, kept six years

## DETERMINATION

- Deterministic where derivable: dates, thresholds, freshness
- AI-drafted where judgement is needed; human attestation mandatory
- Every AI output logged

**PRINCIPLES** 3 one activity · 4 works alongside silos · 5 continuous · 6 humans sign **ANCHORS** SS1/21 ch.8 · SYSC 15A.6 · PS26/2 · R-D1-D4 · R-D7-D10 · R-C5

# A quiet day: continuous proof and testing

No incident — and the system is still producing proof: nightly, quarterly, annually

## NIGHTLY

### Collectors refresh the proof

- Mapping freshness refreshed from CMDB discovery dates, HR role changes, vendor contract changes
- Change records touching IBS resources pulled in
- UK-pack control evidence collected on each obligation's schedule
- Every artefact hashed, stored once; freshness computed: fresh, stale, missing

## QUARTERLY

### A scenario test, executed

- 'Loss of primary cloud region' runs through Act in isolated test mode, with injects and timings
- Same plans and engine as a live event
- Confidence rating recorded against the tolerance outcome
- Two vulnerabilities enter the remediation register, with owners

## ANNUALLY

### Self-assessment refreshed

- Section per IBS regenerated from live data ahead of the board cycle
- Links to every artefact; diff against last year
- SMF24 reviews; the board approves
- Retained six years, approval recorded

Principle 5 · continuous, not annual

Principle 4 · works alongside silos

Answers the FCA's March 2026 findings: stale mapping, recovery claimed without evidence, self-assessments assembled by hand.



One service. One scenario.  
One measured baseline.

Michela Carloni Gammon

[michela.carloni@everbridge.com](mailto:michela.carloni@everbridge.com)

