



GROUP BUSINESS CONTINUITY MANAGEMENT POLICY

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	Business Services Director
Author:	Business Services Director
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Diversity compliant:	Yes
Equality Impact Assessment required:	No
Data Protection compliant:	Yes
Health & Safety compliant:	N/A
Procedure implemented:	Yes
QL system changes made:	N/A
KPIs / reporting arrangements implemented:	Yes
Training Completed:	Yes
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This document can also be provided in large print, braille, audio or other non-written format,
and in a variety of languages

1. Overview

The Caledonia Housing Association Group ('the Group') is made up of Caledonia Housing Association, and its constitutional partners, Cordale Housing Association, and Bellsmyre Housing Association. The Group is fully committed to ensuring its internal processes are sufficiently robust that key services continue to be delivered during any significant incident. This commitment is achieved through developing appropriate business continuity management arrangements across the Group.

Business continuity management is a framework that assists in the management of risks which might impact the smooth running of an organisation or the delivery of a service. These risks could be from the external environment such as adverse weather, utility-related or disruption caused by the loss of a key supplier. In terms of internal disruption this could be caused by the loss of key staff, ICT systems failure or the loss of offices/business premises.

Business continuity management provides a framework for improving resilience to interruption so that key business systems and processes can be recovered while at the same time ensuring the provision of business-critical services to service-users.

2. Aims and Objectives of Caledonia Business Continuity Policy

The aim of this policy is to set out the requirements and approach for the production of individual Business Continuity Management Plans (BCMP) for all identified business-critical activities for each of the Association's that make up the Caledonia Group. The BCMP will ensure there are sufficient levels of resilience for all identified business-critical activities across the Group. Having developed the necessary resilience levels into those key activities this will ensure customers will continue to receive an appropriate level of service provision during any emergency/disaster impacting on the Group.

The objectives of this policy are:

- I. To improve the resilience of each department within the Group through identifying and managing their many and varied operational risks inherent in the delivery of their services;
- II. To efficiently maximise the use of key Group resources during an emergency/disaster;
- III. Commit the Group to regular reviews of the business continuity arrangements/plans to ensure they reflect the operational needs of the individual Associations that make up the Caledonia Group.

3. Policy Scope

The scope of this policy covers business-critical activities delivered to Group internal customers (internal and external), and service delivery partners which includes (but not limited to):

- Tenants/service-users across all three associations
- Group staff
- Contractors
- Partnership bodies

4. Links to Other Caledonia Housing Group Policies/Procedures

This policy is linked to the following Group policies and procedures which have business continuity considerations:

- Group Risk Management Policy
- Emergency Response Procedure
- Notifiable Events Policy and Procedure

5. Business Continuity Management Plans Implementation

The [individual] Association's Business Continuity Management Plans (BCMP) will only be implemented in the event of a **'disaster'** that has a direct impact on the respective Association. The Group has defined a 'disaster' as:

'A business interruption event that is extraordinary and that causes disruption to, or loss of key business resources'

Examples of common disasters falling under the above description include the following:

- Loss of key business premises/offices through major damage or restricted access to buildings;
- Adverse weather conditions preventing staff from attending their workplace;
- Loss of key ICT systems;
- Loss of key staff through widespread illness or strike action;
- Loss of life through fire or serious accident in the workplace; and
- Major utility failure or key suppliers/contractors unable to provide business-critical services to the Group.

The object of each of the individual Association's BCMP is to ensure that appropriate structures and protocols are in place to enable effective response to a business interruption event that has the potential to impact on the Group's or the individual Association's strategic/operational objectives. Each Association's BCMP documents the processes and resources required to ensure business-critical services continue to be delivered both during, and after any business continuity event until service delivery is fully restored.

6. Roles & Responsibilities

The overall responsibility for business continuity arrangements across the Group is with the Group's Chief Executive Officer. The Chief Executive Officer will ensure in situations where any of the Association's BCMP are invoked, that all relevant departments/teams/service delivery partners across the Group work together to restore business-critical services.

To support the Chief Executive Officer in their business continuity role, the Group has developed an emergency response procedure to manage the initial response in any emergency/disaster situation.

The responsibility for maintaining, and ensuring each BCMP remains effective in response to any disaster situation has been devolved to the Group's Business Continuity Management Project Team (BCMPT).

The BCMPT consists of representatives from each department within the Group, (including a representation for the partnership Associations). All BCMPT representatives have in-depth knowledge relating to the business-critical activities within their respective departments.

7. Recovery

Following completion of the immediate response phase and management of the incident as detailed in the Group's Emergency Response procedure, the strategic role for recovery and resumption is shared between the following:

- i. Emergency Lead Officer
- ii. Service Recovery Team

Co-ordination and direction at departmental level will be provided by departmental management team using the relevant elements of the respective BCMP.

Each Association's BCMP will be used flexibly to inform the response according to the scope and magnitude of the disruption. The process for restoration of critical services will be based on the Business Recovery Plans contained in the respective BCMP. Each Business Recovery Plan will provide the necessary information/guidance to restore the agreed level of business-critical activities.

8. Incident Reporting & Media Management

A disaster or business continuity incident often creates significant interest from the local and national media. Therefore it is essential that only authorised Group staff can act as the nominated spokesperson for the Group.

In most cases the Chief Executive Officer will be the only point of contact with the media and will inform the Chair or Vice Chair of the disaster/business continuity incident. In the absence of the Chief Executive Officer, the Emergency Lead Officer will have delegated authority to deal with media enquiries and authority to contact the Chair or Vice Chair.

The Chief Executive Officer may delegate responsibility to the Area Director for the following in regards to a business continuity event that involves any of the partnership Associations:

- Media management
- Notifying the respective Chair of the governing body regarding the

The Emergency Lead Officer has also delegated authority to contact the Scottish Housing Regulator (SHR) in relation to reporting the incident if it falls within the SHR's definition of a notifiable event.

Details of any disaster/business continuity event will also be reported to the Management Board at the next appropriate Board Meeting. Any business continuity incident involving the partnership Associations will be jointly reported to both the Group Management Board, and the respective partnership Association governing body.

9. Review and Testing of Business Continuity Plan

To ensure the BCMP arrangements remains robust and effective in terms of restoration of business-critical activities, each Association making up the Caledonia Group will review their respective BCMP every six-months.

A Group-wide approach will be taken for developing a programme of testing and exercising of the BCMP arrangements across the Group. Any lessons learned from the testing of individual BCMP arrangements will be incorporated into the rolling six-monthly review process as part of the Group's commitment to continuous improvement.

10. Group Governance Arrangements

Business Continuity Management forms part of the Group's overall corporate governance arrangements. An annual report will be submitted to the Group's Management Board providing details on the following:

- Any incidents that required the Group's business continuity arrangements to be implemented by the Chief Executive Officer;
- Details of any implications/obligations arising from new legislation relating to business continuity management within the registered social housing sector;
- Any key findings from the testing/validation programme relating to the Group BCMP; and
- Any recommendations arising from internal or external audits of the Group's business continuity arrangements.

11. Policy Availability

This policy will be available on the Group's internet and intranet sites. This policy will be provided to all key suppliers/contractors who have a business continuity role as part of the restoration of the business-critical activities for each of the Association's that make up the Caledonia Group.