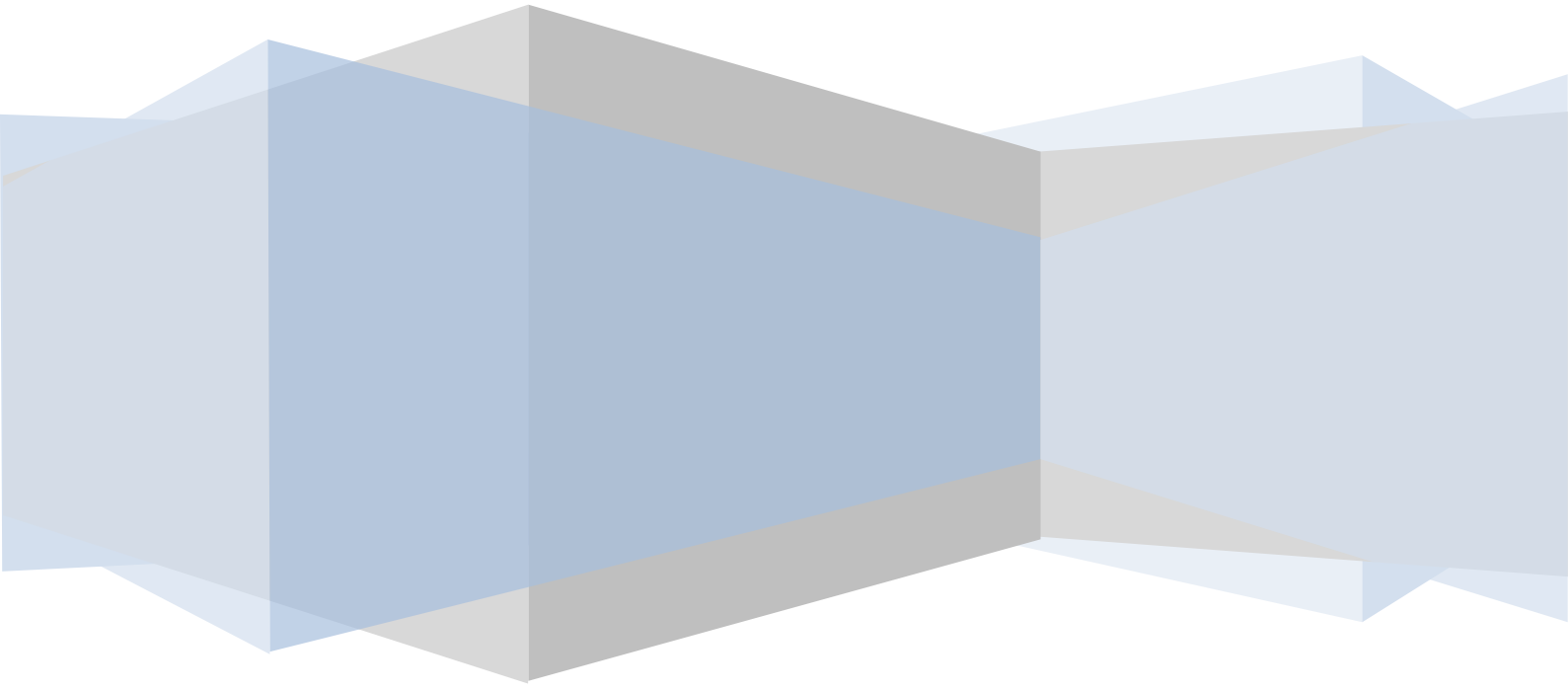
CDHA

Cathcart & District Housing Association

BUSINESS CONTINUITY POLICY

October 2021



All Policies are available on tape, in braille and in translation into most languages. Please ask a member of staff if you would like this policy in a different format.

Date of Policy Review: October 2021
Date of Committee Approval: 19 October 2021
Date of Next Review: October 2024

SCOTTISH HOUSING REGULATOR STANDARDS	STANDARD 1: The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users STANDARD 2: The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users, and stakeholders. And its primary focus is the sustainable achievement of these priorities. STANDARD 4: The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisations purpose STANDARD 5: The RSL conducts its affairs with honesty and integrity STANDARD 6: The governing body and senior officers have the skills and knowledge they need to be effective.

Contents

	Page No.
Overview	1
Aims and objectives of the policy	1
Policy scope	1
Links to other Policies	2
Business Continuity Management Plans Implementation	2
Stages of the Business Continuity Plan	2
Recovery	3
Incident Reporting and Media Management	4
Review and Testing of Business Continuity Management Plan	4
Procedures	5

1. Overview

Cathcart & District Housing Association (CDHA) 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.

Business continuity management is a framework that provides for a process during any "disaster" A disaster is defined as any unplanned event that results in the inability of the business to support operations in whole or in part. We consider the main types of disaster would be:

- Natural Disasters
- Wilful Damage
- Accidental Damage
- Technological Breakdown
- Pandemic Illness

In order to minimise the damage to the business by such an occurrence, it is necessary to have a recovery plan, which addresses the worst case scenario and other scenarios that will affect our ability to operate in the normal manner.

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 CDHA Business Continuity Policy

This policy aims to set out the requirements and approach for the production of individual Business Continuity Management Plans (BCMP) for all identified business critical activities of the Association. The BCMP will ensure there are sufficient levels of resilience for all identified business critical activities. Having developed the necessary resilience levels into those key activities will ensure customers will continue to receive an appropriate level of service provision during any emergency/disaster impacting on the organisation.

In setting this policy three stages have been identified

- Risk assessment and an analysis of the impact on the business in order to determine the magnitude of the exposure to threats
- Detailed documented processes of the business continuity plan
- Undertaking to test and implement the business continuity plan. Ensuring that the plan meets any changes to the business.

3. Policy Scope

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

- Tenants/service-users
- Organisation staff
- Contractors
- Partnership bodies

4. Links to Other CDHA Policies/Procedures

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

- Risk Management Policy
- Notifiable Events Policy and Procedure
- IT Continuity & Disaster Recovery Policy

5. Business Continuity Management Plans Implementation

The Association's Business Continuity Management Plan (BCMP) will only be implemented in the event of a '**disaster'** that has a direct impact on the Association**.**

Whilst we have identified high level disaster headings above below are details of business specific disasters falling under the above description which we see as some of the main threats:

- 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 Association.

The object of the Association's BCMP is to ensure that appropriate structures and protocols are in place to enable an effective response to a business interruption event that has the potential to impact on the Organisation's or the individual Association's strategic/operational objectives. The 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. Stages of the Business Continuity Plan

Stages	Objective
Risk Assessment	
1. Risk Evaluation	Identification of critical business functions essential for continued service or production. Determination of the events that can adversely affect the Association, the damage that such events can cause, and the controls needed to prevent or minimise the effects of a loss potential.
2. Business Impact Analysis	Identification of the impact that results from the disruption that can affect the Association and the techniques that can be used to qualify and qualify such impacts Prioritise critical business functions
Development and documentation of Business Continuity Plan	
1 Recovery Strategy	Determination and selection of alternative recovery operating strategies to be used to maintain the critical functions
2 Document Plan	Written plan and Senior staff functions

Testing and implementation	
1. Test plan	Testing criteria and procedures for evaluation and results
2. Maintenance of Plan	Development of processes to keep the plan up to date and ensure reviews are carried out to reflect any new areas of business Ensure the plan is in line with the strategic direction of the organisation.

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

Attached to the plan are checklists that have been prepared to ensure that each area of operation has clear guidelines as to those responsible.

7. Recovery

One of the main aims of this policy is to determine immediate response times to be adhered to wherever possible:

Classification	Description	Recovery Time Frame
Essential	IT Systems Staff Numbers Access to company information Notification to Board Notification to Insurers	Up to 48 hours after disaster
Important	Notification to Tenants and service users Notification to Partner organisations	3-7 days after disaster
Non Essential	Establishment of temporary premises Ordering new equipment	8 – 30 days after disaster

Co-ordination and direction at departmental level will be provided by departmental management team using the relevant elements of the BCMP. At this stage, there will be an impact assessment carried out to determine how the disaster can be managed. The impact assessment will involve:

- Contact details for all personnel required to manage the emergency
- Identify what needs to be done and by whom
- Senior staff will be the impact assessment team
- In the event of no company telephones being available, the Director and Senior staff mobile phones will be used as the main point of contact.
- All staff members will provide home numbers as an addendum to this policy so that they can be contacted in the event. All Senior Staff will retain a copy of this policy at home.
- Daily updates will be provided for the first 7 days following any event to all staff.
- Any media press announcement will be made by the Director or in the absence of the Director by a member of the senior management team in conjunction with the chairperson.

The 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 BCMP.

The Senior staff team will decide on a process of what is needed to provide continuity and will source temp office space, new equipment as quickly as possible. In the meantime, the service will be provided by remote access from home. Liaison with our IT company will be carried out to ensure everyone has a connection.

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 Organisation staff can act as the nominated spokesperson for the Organisation.

In most cases, the Director 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 Director, any member of the senior management team who is available will have delegated authority to deal with media enquiries and authority to contact the Chair or Vice Chair.

The same Senior 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 Committee at the next appropriate Committee Meeting.

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, the Association will review the BCMP every three years

An Organisation-wide approach will be taken for developing a programme of testing and exercising the BCMP arrangements across the Organisation. Any lessons learned from the testing of individual BCMP arrangements will be incorporated into the next review process.

PROCEDURES

Emergency Services

Ref	Service Area	Responsibility	Action
E1	Emergency Services	Director (or in absence Senior Officer)	Ensure that the appropriate emergency services are contacted at the earliest opportunity
E2	Emergency Services	Director (or in absence Senior Officer)	Liaise with emergency services as required. Ensure that information is passed as necessary to any interested party (family of staff/Committee/Tenants)
E3	Health & Safety	Health and Safety Officer (or Director in absence of H&S Officer)	Ensure that all H & S requirements are met including appropriate fire drills and evacuation procedures and appropriate accident reports completed and bodies notified as required
E4	Accidents	Health and Safety Officer (or Director in absence of H&S Officer)	Our H&S Manual has a first aid policy that contains all emergency numbers and contact details for RIDDOR & COSHH. There are trained first aid staff and adequate first aid supplies.
E5	Fire damage to the office	Health and Safety Officer (or Director in absence of H&S Officer)	We have a Health & Safety Control Manual which contains a Fire Policy and Risk Assessment. Our compliance with the control manual is audited every two years by an external auditor. The office is fitted with fire alarms, smoke alarms, emergency lighting, emergency signs, and fire equipment. All staff are aware of the evacuation procedure. We have systems in place to protect our IT data. We also use a digital filing system, therefore, most of our documents are scanned and secured offsite.

Tenant Services

Ref	Service Area	Responsibility	Action
T1	Sheltered Housing	Housing Officer	Liaise with Housing support worker to ensure that critical issue is dealt with in appropriate way i.e. fire, water board, or other emergency services including Association Contractors
T2	Tenants General	Senior Housing Officer	Upload details as required to Facebook, website with emergency contact details if the office is no longer available

Media Coverage

Ref	Service Area	Responsibility	Action
M1	Media	Director (or in absence Senior Officer)	If the nature of the business interruption is of media interest. Issue press statement as appropriate.

Governance

Ref	Service Area	Responsibility	Action
G1	Governance	Director (or in absence Senior Officer)	Ensure that information is passed to Chairperson or Vice Chairperson as soon as is practicable
G2	Scottish Housing Regulator	Director (or in absence Senior Officer)	Ensure that the Notifiable event policy is followed in notifying SHR if and as required.
G3	Financial – the risk of theft and management of the Association's cashflows.	Director (or in absence Senior Officer)	The Treasury Management Policy is in place to control risks to the Association's cashflows, banking, deposits, and capital market transactions. Gearing ratios and bank covenants are in place and accounts are produced and presented to the Management Committee. Accounts are audited annually and presented to the members at our AGM. The accounts are also sent to the Scottish Housing Regulator, our banks, OSCR, and the Financial Conduct Authority. Account balances are monitored regularly and strict procedures and levels of authority are in place for Finance staff who have access to bank accounts. The Finance and Audit Sub Committee has a role to scrutinise all areas of internal and external audit, management accounts, and risks to the organisation.
G4	Loss of suppliers/ traders	Director (or in absence Senior Officer)	We have an approved list of sub-contractors including several for each trade. Contractors' invoices are paid on completion of work and therefore would not receive any payments unless the work had been completed to the satisfaction of our tenants and maintenance staff.
G5	Staff sickness	Director (or in absence Senior Officer)	All departments use the Home Master housing management system which contains notes, therefore, members of staff can cover for each other in the event of a colleague being sick. We have 13 office-based staff members.
G6	Succession planning	Director (or in absence Senior Officer)	It is critical that new members of staff have the correct training to allow them to take over any role. Senior staff have attended management courses and step by step procedures have been written to assist new staff members. Our committee is also working on succession planning through training events and recruiting new members to the board.

IT

Ref	Service Area	Responsibility	Action
IT1	IT provision	Director (or in absence Senior Officer)	Activate Business interruption IT policy and contact IT providers at the earliest opportunity
IT2	IT provision	Director (or in absence Senior Officer)	Establish a procedure for continuing with IT at another location if required i.e. staff working from home to provide ongoing service.
IT3	IT provision	Director (or in absence Senior Officer)	Arrange to retrieve business backup information from fireproof safe in order to have reinstalled
IT4	Loss of IT & Telecommunications	Director (or in absence Senior Officer)	All data is backed up each day to Veeam Cloud Connect and the Home Master web-based system has an external server. We have network support supplied by external consultants. All members of staff are supplied with mobile phones and laptops which provide access to their desktops. We have a backup BT phone line that can be used if VOIP were to let us down. CDHA has an active Facebook page which can be used to alter customers to any change in office services. There is a more detailed IT Continuity & Disaster Recovery Policy in place.

Inclement Weather

Ref	Service Area	Responsibility	Action
W1	Staff Provision	Director (or in absence Senior Officer)	Make contact with all staff members to advise on procedures during office closure. Perform risk assessment as to the practicalities of getting to the office or not.
W2	Staff Provision	Director (or in absence Senior Officer)	Establish with each member what the requirements are for the period of severe weather and initiate a work plan
W3	Staff Provision	Director (or in absence Senior Officer)	All members of staff have access to emails and desktops via remote access.
W4	Staff Provision	Director (or in absence Senior Officer)	Keep staff updated on office opening times in line with the weather situation

*********THE DIRECTOR AND FINANCE OFFICER HOLD ALL STAFF CONTACT DETAILS**