

Business Continuity and Disaster Recovery Policy

Purpose:	To establish DPHA's policy and set out our position in the event of an emergency, major incident or disaster.
Review Date:	January 2025
Guidance:	Housing Scotland Act 2001 SHR Notifiable Events readyscotland.org HSE Managing Emergency Procedures Scottish Housing Resilience Group
Regulatory Standards:	1.2 The RSL's governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL. 1.3. Decision-making complies with the RSL's constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below. 4.3. The governing body identifies risks that might prevent it from achieving the RSL's purpose and has effective strategies and systems for risk management and mitigation, internal control and audit.
Other relevant policies	IT Security Policy Customer Service Standards Health and Safety Policy Financial Procedures and Regulations Risk Management Policy Procurement Attendance and Management Right to Compensation Flexible Working Staff Recruitment Governing Body Members Handbook Standing Orders Charitable Rules
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1.0 INTRODUCTION

- 1.1 Dalmuir Park Housing Association (DPHA) will make every effort to ensure we can deliver uninterrupted and continual service provision to our tenants, customers, and service users. Our Risk Management activities aim to minimise the risk of damage to our customers and our business. We do, however, recognise that certain circumstances can arise which may impact the continuity of our services and such circumstances can be out with our control.
- 1.2 The Business Continuity & Disaster Recovery Plan will be implemented in the event of a significant incident, emergency or disaster or circumstance which causes an interruption to our service delivery or poses a threat to our business continuity.
- 1.3 This Policy and connected Plan covers all our business-critical activities across the Association and service delivery to our tenants, customers, service users, owners, staff, contractors/consultants and partner organisations and stakeholders.
- 1.4 In the event of a disaster or a serious business interruption, we recognise that our people may react emotionally and have higher adrenalin levels than usual. We emphasise here that they should not put themselves at risk when at other times they would take a safer course of action. Personal safety is paramount and should be borne in mind throughout any disaster or its knock-on effects.

2.0 AIMS OF THE POLICY

- 2.1 To provide a robust framework for dealing with any incident, emergency or disaster;
- 2.2 To provide for a process detailing how we intend to maintain or resume affected services and minimise any impact on business continuity;
- 2.3 To ensure customers will continue to receive an appropriate and legally compliant level of service provision during any incident, emergency or disaster impacting on the Association;
- 2.4 To improve the resilience of the Association through identifying and managing operational risks essential for the delivery of services;
- 2.5 To efficiently maximise the use of the Association's resources during an incident, emergency or disaster;
- 2.6 Confirm how 'normal' business will resume following an incident, emergency, or disaster and define the circumstances when the Business Continuity & Disaster Recovery Plan should be used, and;

- 2.5 To commit to regularly review the business continuity arrangements and Plan to ensure they reflect the strategic and operational needs of the Association.

3. THREATS TO BUSINESS CONTINUITY

- 3.1 An abnormal incident or situation arising or threatened, is something which:

- would have a significant impact on the Association's normal business operation or future existence as a business and/or;
- requires special mobilisation and deployment of staff, resources or facilities to deal with it.

- 3.2 Examples include but are not limited to:

- Any incident resulting in loss of life or serious injury;
- Major incident affecting the housing stock;
- Major utility failure/telecoms outage;
- Major IT systems failure;
- Major Data Loss/Data Protection Breach
- Loss of key personnel;
- Loss of offices/premises for service delivery;
- Major contractor/supplier goes out of business;
- Major Fraud/theft
- Pandemic and/or other lockdown.

4. CONTEXT

In the Association's area of operation, the local authority has a duty to plan for emergencies and has professional officers to deal with these. In a local authority-declared emergency the Association will co-operate and assist as required with the local authority.

5. ROLES & RESPONSIBILITIES & ACTION PLANNING

- 5.1 Should an emergency arise, it is the responsibility of the Chief Executive (or in their absence a member of the Leadership Team) to identify the nature of the situation and to designate it as an event which requires use of the Business Continuity & Disaster Recovery Plan and to appoint a Business Continuity Action Team. In all circumstances the Chief Executive and the Chair of the Association must be kept informed of the situation and details of any action taken.

- 5.2 The overall responsibility for implementing the Business Continuity & Disaster Recovery arrangements lies with the Business Continuity Action Team (the Action Team) led by the Chief Executive. In extreme cases, this could include all staff. The Chief Executive will ensure, in situations where any aspect of the Plan is invoked, that all relevant staff, office bearers, teams or service delivery partners engaged by the Association work together on a Business Continuity Action Plan to restore business-critical services and ensure business continuity. The Chief Executive will appoint a depute to act in their absence.

5.3 Roles within the Action Team will be clear and will include;

- Communications with staff, board members and other stakeholders
- Communications with the media
- Liaison with key suppliers e.g., Insurers, lawyers, lenders
- Reporting to regulators
- Record keeping
- Fieldwork e.g., IT restoration, building works, sourcing alternative premises
- Health & Safety and Risk Assessment
- Staff welfare
- Service continuity for unaffected customers and stakeholders, e.g. maintaining legal obligations and bank covenants

5.4 These roles will be assigned according to the Business Continuity Action Plan drawn up by the Action Team.

5.5 All permanent members of staff and governing body office bearers will be issued with a copy of this Policy and the Plan. The Leadership Team and Office Bearers should keep a copy at home, in a secure location as they may not be able to access computer files when they need to use it.

6. BUSINESS CONTINUITY & DISASTER RECOVERY PLAN

6.1 The Business Continuity & Disaster Recovery Plan (the Plan) is attached as Appendix 1.

6.2 The Plan provides details on the following key information:

6.2.1 **Business Continuity Action Team:** A list of the Action Team and personnel to be contacted with responsibilities should the Plan be invoked.

6.2.2 **Event Implementation:** Detailed guidance on implementing example events, including priority tasks for each scenario.

6.2.3 **Communications and Emergency Contact details:** For all staff and Board members, key contractors and suppliers, staff key holders, and all other key stakeholders.

6.2.4 **Useful information websites:** Key information websites for weather, travel, public health, and other information relevant to the Plan.

6.2.5 **Business Impact Analysis (BIA):** The BIA provides information on the consequences of the disruption to our main business functions/systems if they were to fail and provides timescales for business continuity.

6.2.6 **Key Documents:** provides a list of key central documents that are used in an event of an emergency. This will include a copy of the template Business Continuity Action Plan, which covers; Strategic planning, Communication plans, Service and Operational changes, Staff and Board IT and equipment and arrangements, Unplanned Costs, Deviation from policy and Data protection.

7.0 REVIEWING AND TESTING THE PLAN

- 7.1 The Business Continuity and Disaster Recovery Policy and Plan will be reviewed every three years, and scenario-tested with main threats every year, to ensure it remains effective and robust. We note that only some elements of the Plan can be tested, as by their very nature few incidents, emergencies or disasters can be replicated. Annual testing will focus particularly on ICT recovery plans and checklists, with testing on the main office and other site locations evacuation procedures being taken from the fire drill evacuations. It will also ensure all contact details are up to date and that all necessary training has been undertaken.
- 7.2 To ensure continuous improvement and business continuity, any results from testing, observations and real live incidents will be reported to the Board and used to review the Plan and to make any necessary changes to improve our procedures and processes.
- 7.3 A formal review will also take place after any significant incident has occurred, to make sure we learn from our experience. This will be reported to the Board within 2 months of the incident with recommendations for any updates required to the policy and/or plan.

8.0 TRAINING

- 8.1 As part of the induction process all new Leadership Team members will be trained in the Business Continuity & Disaster Recovery Policy and Plan, and they will be made aware of the specific areas of responsibility that they have.
- 8.2 Staff training will take place annually on the Disaster Recovery and Business Continuity Plan, or earlier if required by the outcomes of an event which has required use of the Plan.

9.0 MONITORING & REVIEWING THE POLICY

- 9.1 This policy and plan will be reviewed every three years unless an event or legislation prompts an earlier review. When reviewed, a report will be provided to the Board providing details on the following:
- A reminder of any incidents that required the Association's business continuity and disaster recovery arrangements to be implemented by the Chief Executive;
 - Details of any implications or obligations arising from new legislation relating to business continuity and disaster recovery management within the social housing sector;
 - Compliance with any guidance issued by Scottish Government, public health organisations, Regulators, Care Inspectorate or similar organisations;
 - Any key findings from the testing or validation programme or from real life

- experiences; and
- A reminder of any recommendations arising from internal or external audits of the business continuity arrangements.

10.0 EQUALITY AND DIVERSITY

We are committed to promoting an environment of respect and understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. We will apply this commitment in the drawing up and implementation of Business Continuity Action Plans.

11.0 GDPR

We will treat personal data in line with our obligations under the current data protection regulations and our Privacy Policy, including during events referred to in this policy. Information regarding how data will be used and the basis for processing data is provided in our Customer Fair Processing Notice.