# Blackwood
homes | care | support

**Business Continuity Policy**

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| Version Number | Issue 2 |
| Date Revision Complete | April 2016 |
| Policy Owner | Business Improvement Manager |
| Author | Emma Earle, Business Services Officer |
| Reason for Revision | Standard review; as well as to incorporate recommendations made by our internal auditors (Scott-Moncrieff) and by Foresee Associates during the 2015 test of our current emergency response plans. |
| Proof Read | Lesley Carnegie, Business Improvement Manager |
| Date Approved | 24th May 2016 |
| Approved by | Audit Committee |
| Next Review Due | May 2019 |

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| Audience – Training and Awareness Method | A range of detailed procedures and templates have been produced in support of the overall policy. Training has already been carried out in all locations as part of the Business Continuity Project. Refresher training and awareness raising sessions will be provided during the first six months of 2016/17. |
| Effective Date | 1st July 2016 |

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| Internal References | Business Continuity Plans<br>Critical Incident Procedures<br>Business Impact Analysis Templates<br>Crisis Management Team Roles & Responsibilities<br>On-Call Procedure and Role Profile<br>Health & Safety Procedures (fire evacuations)<br>Disaster Recovery Plan (ICT)<br>Process for processing Notifiable Events |

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| External References | SHR Notifiable Events Guidelines<br>Scott-Moncrieff Internal Audit Report<br>Foresee Associates – Emergency Response Plan Test Report |

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| Comments | |

**Business Continuity Policy**

## 1. Policy Statement

1.1 Blackwood aims to provide uninterrupted services to our customers. Blackwood recognises, however, that circumstances can arise that can impact the continuity of our business. There are Business Continuity Plans (BCPs) in place to be implemented if such circumstances arise, and this policy outlines how Blackwood will maintain and test these plans, and defines the circumstances in which the plan should be used.

1.2 This policy covers all areas of Blackwood's offices, care homes and to our delivery of services within our housing stock. There is a service level plan for each satellite and regional office, Head Office, and for each of our care homes. Provisions for our care at home service and housing stock are covered under the plan for the office the service is based from. For example, information for Aberdeen Services is included in the plan for the North Regional Office.

1.3 Any critical incident triggering the Business Continuity Plan would be regarded as a Notifiable Event that must be reported to the Scottish Housing Regulator (SHR) by the Admin & Governance Team Leader and Head of Business Services. This policy must therefore be read in conjunction with the SHR Notifiable Event Procedure 2012 and Blackwood's Process for processing Notifiable Events.

1.4 The Care Inspectorate will be notified if the critical incident is in a care home.

## 2. Terminology

| Term | Definition |
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| **Business Continuity** | The plans and preparations to ensure the organisations' critical business services and activities are delivered to all customers during and after a critical incident. |
| **Crisis Management Team** | The list of Blackwood personnel who should be involved when the Business Continuity Plan is invoked. This is fully detailed in the Emergency Response Procedures and includes the following roles:<br>▪ Regional Manager<br>▪ Housing & Care Director<br>▪ Strategic Development Director<br>▪ Chief Executive<br>▪ Head of Business Services<br>▪ Marketing Manager<br>▪ Business Solutions Manager<br>▪ Head of Finance |

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| **Critical Incident Response** | Actions taken in response to a critical incident to minimise or contain the effects, and actions taken to save lives and provide basic services in the immediate aftermath of a disaster impact, for as long as an emergency situation prevails. |
| **Disaster Recovery Plan** | The plan for recovering and restoring the organisations technological infrastructure and capabilities after any interruption. *This refers only to ICT recovery.* |
| **Critical Incident** | Any incident, series of incidents, or events that affect 3 or more of Blackwood's properties, 3 or more rooms in a care home, or involves a loss of life through unnatural causes. Without management, it can escalate into an emergency, crisis or disaster. |
| | Examples include Major Utility Failure, Mass Resignation or some other form of Industrial Action, Adverse Weather Conditions, Widespread Illness, or Significant Loss of Life (e.g. through fire/explosion). |
| **Minor Incident** | Any incident, series of incidents, or events that affect less than 3 Blackwood properties or less than 3 rooms in a care home. |
| **On-Call Officer** | The member of staff responsible for taking emergency calls and managing minor incidents out of office hours, and alerting the Regional Manager to critical incidents out of hours. |

## 3.   Circumstances for Implementation

3.1   The Business Continuity Plan should be implemented in the event of a critical incident, as defined above.  Within the regions, a Regional Manager will determine when an incident is classed as a critical incident. If an incident occurs within Head Office, a member of the Executive Management Team will make that decision.

## 4.   Key Responsibilities

4.1   The overall responsibility for the Business Continuity Plan sits with the Chief Executive, who will ensure, in situations where the Business Continuity Plan is invoked, that all areas of Blackwood work together so the organisation can continue with minimal disruption to service provision.

4.2   The overall responsibility for maintaining Business Continuity arrangements lies with the Head of Business Services.  The Head of Business Services also has responsibility for ensuring that the information specific to Head Office is maintained and that the critical incident procedure is up to date.

4.3   The Housing and Care Director, through the Housing Services Team, has responsibility for maintaining the information which is specific to the BCP relating to our tenants, including our on-call arrangements.

4.4   The Housing and Care Director, through the Regional Managers, Service Managers and Housing Team Leaders, is also responsible for the information relating to care homes, Regional Offices and for satellite offices.

4.5     The On-Call Officer is responsible for managing minor incidents out of hours and alerting the Regional Manager to critical incidents out of hours.  Full details are given in the On-Call Procedure and Role Profile, and Critical Incident Procedures.

4.6     It is the responsibility of the Regional Manager to invoke the Business Continuity Plan, to delegate tasks to the team assisting with the incident, and to notify members of the Crisis Management Team.

4.7     Further responsibilities are outlined in the Emergency Response Procedures and Crisis Management Team Roles & Responsibilities.

## 5.     Business Continuity Plans

5.1     The contents of each service level Business Continuity Plan are as follows:

1.  Introduction and Definitions.
2.  Critical Incident Procedures, contacts and templates.
3.  Continuation of Critical Activities procedures and templates.
4.  Recovery and Resumption procedures and templates.
5.  Site Specific Information – this is information that different sites may hold with regard to their own specific requirements when invoking the plan.  This information is not controlled, and is updated by the Plan Owner as required.
6.  Business Impact Analysis Template.

5.2     Each plan is one complete controlled document, which is updated by the Plan Owner as detailed on the front cover.  This updating is supported by the Business Improvement Manager and Business Services Officer and should take place at least quarterly.

## 6.     Mitigating Business Impact

6.1     Through our Business Continuity Plans for each team, Blackwood has identified the critical areas that would have the biggest impact on our ability to deliver essential services and activities to our customers following an emergency incident.

6.2     These are the areas that need to be prepared for and/or managed during and after an incident to minimise disruption and ensure business continuity.  They fall into five themes as follows:

| People | Ensuring that appropriately skilled staff are available.  Blackwood's mitigation includes:<br>▪ Documentation of procedures.<br>▪ Robust succession planning.<br>▪ Multi-skilled staff to allow redeployment between teams.<br>▪ Use of agency and relief staff, and other partners and suppliers as necessary. |
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| Premises | Providing a service when its usual location is unavailable. Mitigation includes: <br>▪ Citrix on all PCs to enable staff to work from different locations. <br>▪ Laptops and handhelds to allow staff to work remotely. <br>▪ Possible use of existing communal areas as office locations. <br>▪ Identification of similar care/nursing/medical facilities in our neighbourhoods in which to decant care customers. <br>▪ Identification of similar accommodation for decanting tenants. |
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| **Technology & Information** | Minimising loss of access to systems and information records. Blackwood mitigates this by: <br>▪ Hosting IT infrastructure in multiple locations and with regular backups. <br>▪ Being able to work with paper based alternatives for a period of time. <br>▪ Scanning key documentation so it is held electronically. <br>▪ Shared drives so documents/systems can be accessed remotely. <br>▪ Annual testing and reviewing of our Disaster Recovery Plan. <br>▪ Service Level Agreements (SLAs) with software providers. |
| **Supplies** | Providing access to key equipment or materials, through: <br>▪ Identification of alternative/substitute equipment in each BCP. <br>▪ Identification of alternative/substitute suppliers in each BCP. <br>▪ Ability to share equipment/materials across locations. <br>▪ Robust contracts and SLAs with existing suppliers. |
| **Stakeholders** | Managing the involvement of various other organisations or services as required during a business continuity incident, through: <br>▪ Robust contracts and SLAs with existing service providers and suppliers. <br>▪ Named contacts and contact details within our Business Continuity Plans for all key stakeholders. <br>▪ Identification of other facilities and utilities available in our neighbourhoods. <br>▪ Clear Media Handling Procedures <br>▪ Adequate Insurance |

6.3    To enable a quick and effective response following a critical incident, the Chief Executive may make decisions on the above approaches without adhering to normal approval processes as outlined in the Scheme of Delegation.  Such decisions will then be reported to Board at the earliest appropriate opportunity.

**7.    Testing**

7.1    Blackwood will test the Business Continuity Plan annually.  This may be carried out by an external company or by the Business Services Team, as appropriate.

7.2     Additional annual testing will be carried out on the Disaster Recovery Plan separately, and this will be arranged by the Business Solutions Team.

7.3     Testing of our evacuation procedures takes place through the fire drill evacuations at each location, which occur at least twice per year.  This is coordinated by the Organisational Health & Safety Advisor.

7.4     Blackwood will use any results from testing to review the plan and make changes to improve our procedures.

7.5     A review of the relevant plan will also take place after any incident has occurred, to ensure we learn from our experience.

## 8.     Training

8.1     Training will be provided by the Business Services Team as required, covering Critical Incidents, Business Continuity, and On-Call arrangements.

8.2     Business Continuity will also be included in the Induction Programmes of relevant staff and managers.

## 9.     Reporting

9.1     Reports will be submitted to the Audit Committee in any instance where the policy is invoked, or when there are any testing results.  Audit Committee will then decide if any further action is required to improve the Business Continuity Plans or policy.

9.2     The Blackwood Board have delegated Business Continuity to the Audit Committee for the purposes of management supervision, review and operational change. However, any critical situation invoking this policy must also be reported to Board – the Chief Executive / Head of Business Services will be responsible for keeping them informed.

## 10.    Policy Review

10.1    This policy will be reviewed every 3 years or earlier if required.