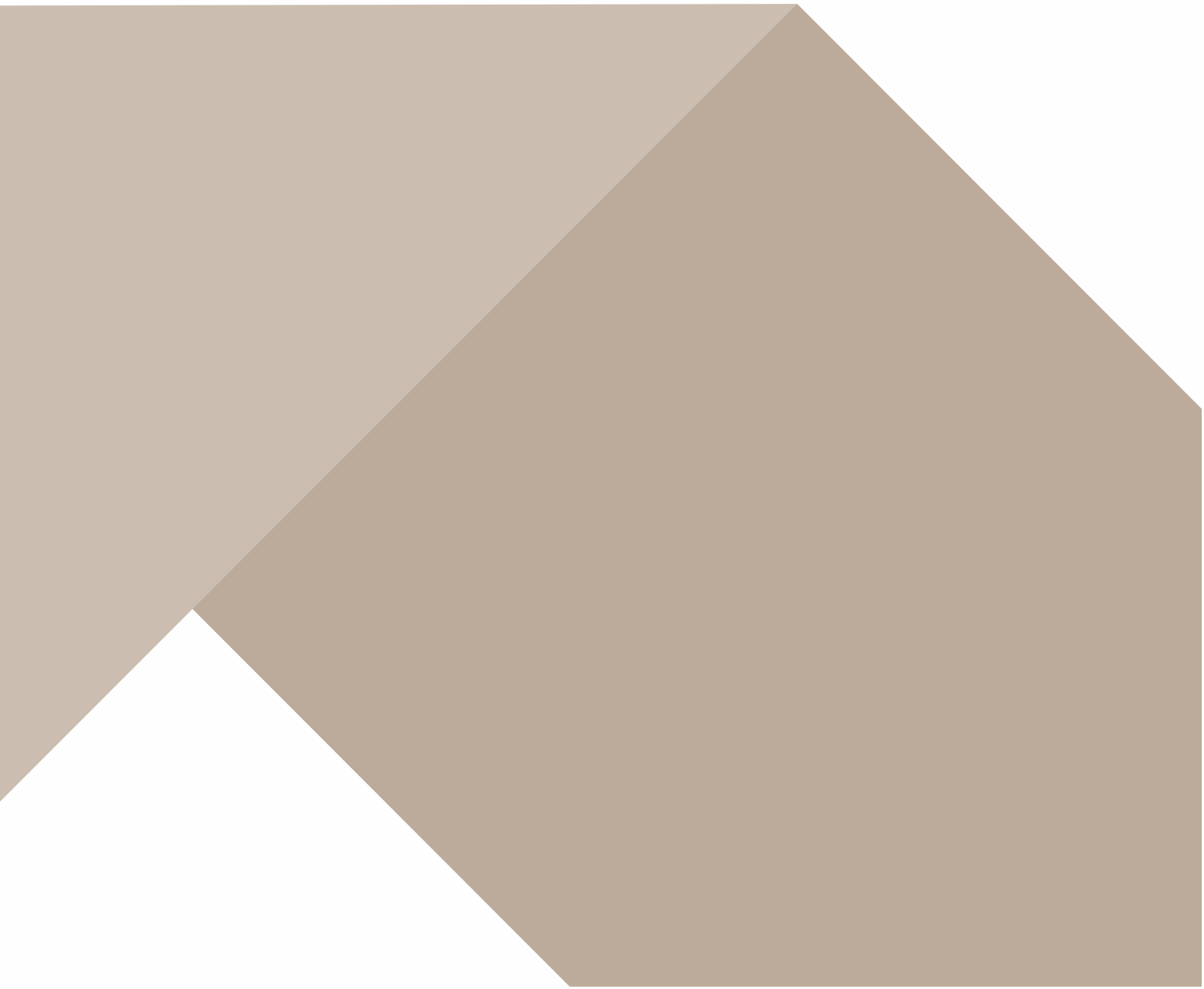# Business Continuity Policy

We will provide this policy on request at no cost, translated, in large print, in Braille, on tape or in another non-written format.

We can produce information on request at no cost in large print, in Braille, on tape or in another non-written format. We can also translate this into other languages. If you need information in any of these formats please call us on 0800 479 7979 or email info@wheatley-group.com

Możemy, na życzenie, bezpłatnie przygotować informacje dużą czcionką, w alfabecie Braille'a, na taśmie lub w innym niepisanym formacie. Możemy je również przetłumaczyć na inne języki. Jeśli potrzebujesz informacji w którymkolwiek z tych formatów, zadzwoń do nas pod numer 0800 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

Podemos produzir informações mediante solicitação e sem custos, em impressão grande, Braille, cassete ou noutro formato não descrito. Também podemos traduzi-las em outros idiomas. Se precisar de informações em qualquer um destes formatos, contacte-nos através do número 0800 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	GROUP BOARD
Date of approval	19 June 2025
Review Year	2028
Customer engagement required	NO
Trade union engagement required	Yes – FOR INFO
Equality Impact Assessment	N/A

Contents

Policy Statement

This Business Continuity Policy (BC Policy) establishes Wheatley Group's commitment to business continuity and aligns with the principles of ISO 22301:2019 International Standard for Business Continuity.

It is Wheatley Group policy to:

- Regard business continuity as a key organisational activity and maintain a comprehensive business continuity approach to implement and manage this;

- Identify the critical business activities of the Wheatley Group through business impact assessment on events that could result in significant business disruption;

- Implement an appropriate business continuity strategy that meets the needs of Wheatley Group;

- Develop and implement business continuity plans to manage business disruption, that cover Wheatley Group information systems, levels of service, operations, premises and employees;

- Regularly test business continuity plans to ensure that they:-

  - Have capacity to maintain or rapidly recover business critical activities;

  - Maintain the availability of key resources to support critical activities; and

  - Prevent or limit the disruption to customers, stakeholders and staff.

- Define the roles and responsibilities of individuals involved in business continuity planning and management and provide appropriate levels of training to ensure that these responsibilities are carried out competently;

- Regularly review Wheatley Group business continuity plans, policies and responsibilities to ensure that the business continuity approach remains appropriate to its needs and is continuously improved

This policy provides a clear statement of our commitment to ensure that critical Wheatley Group business activities can be maintained during a disruption.

A copy of this policy is available to all interested parties via the Wheatley Group and subsidiary websites.

Background

The Wheatley Group Business Continuity Policy is intended to provide the foundations for the Wheatley Group and all subsidiaries ('the Group') around which BC capability is designed and built, to ensure we have in place the measures to manage business interruptions efficiently and effectively.

BC is a holistic process that identifies potential threats to an organisation and the impacts to business operations that those threats, if realised, might cause. The implementation of appropriate BC arrangements and capabilities forms an element of our overall risk approach. It provides a structure for an effective response that safeguards the interests of customers and key stakeholders and protects Wheatley Groups reputation.

The establishment of a BC Policy is recognised as good practice in line with the principles of the ISO 22301:2019 standard (as illustrated below) and the Plan, Do, Check, Act model.
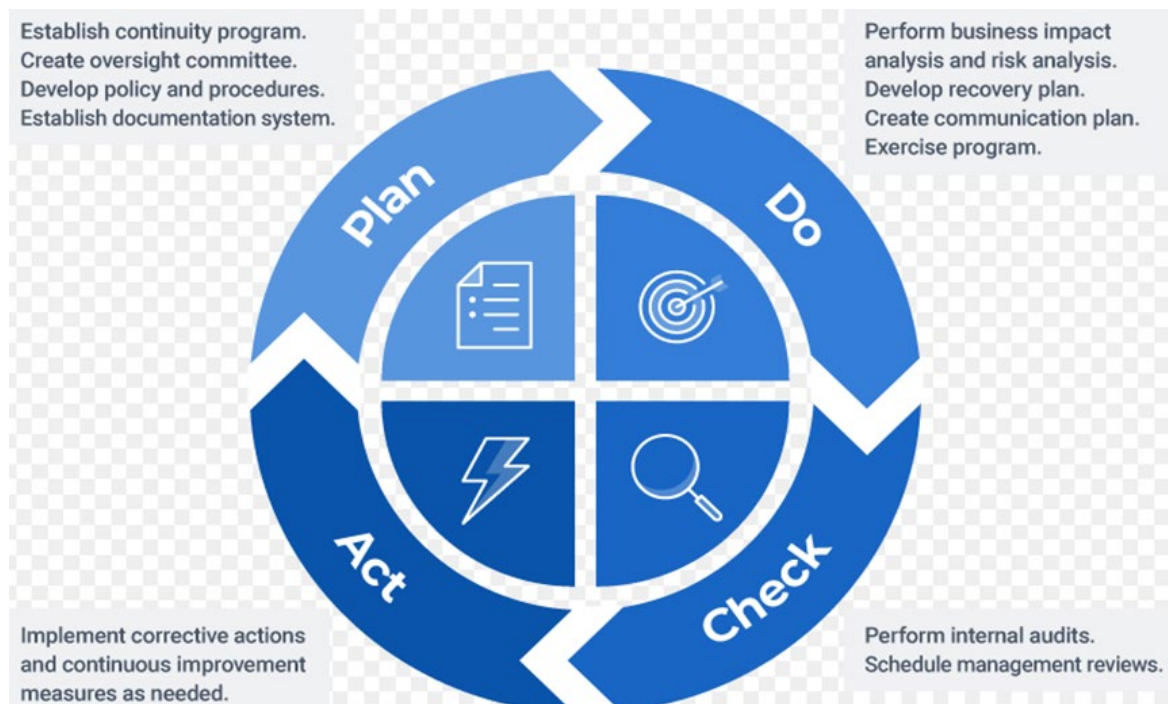
This Policy covers the Wheatley Housing Group and all subsidiaries

We will develop and maintain a practical and effective BC approach following the methodology of a BC lifecycle with the long-term goal being to improve the organisation's BC capability and hence its resilience.

There are many benefits to be gained by embedding good business continuity practices into our culture and organisation. These include: -

- Ensuring the safety and wellbeing of our staff;
- Minimising the impact of significant unplanned interruptions on customers and people we work for;
- Preventing or limiting the impact on stakeholders;
- Demonstrating effective and efficient governance of business risks;
- Protecting the Group's assets and minimising financial impacts; and
- Meeting insurance, legal and regulatory requirements.

Plan Do Check Act model diagram:

Establish continuity program.
Create oversight committee.
Develop policy and procedures.
Establish documentation system.

Perform business impact
analysis and risk analysis.
Develop recovery plan.
Create communication plan.
Exercise program.

Plan

Do

Act

Check

Implement corrective actions
and continuous improvement
measures as needed.

Perform internal audits.
Schedule management reviews.

Section 1
Introduction

1.1   Wheatley Group is Scotland's leading housing, care and property-management group and one of the UK's best-accredited organisations. Owning or managing over 95,868 homes, Wheatley delivers award-winning services to over 210,000 people across 19 local authorities in Scotland.

1.2   The purpose of the Business Continuity Policy is to provide resilience for critical business activities through the implementation of controls that minimise the impact of a disruption on its business products, level of service, operations, premises, employees and infrastructure.

1.3   Our Group subsidiaries are:
- Wheatley Homes Glasgow
- Wheatley Homes East
- Wheatley Homes South
- Loretto Housing Association
- Wheatley Care
- Lowther Homes
- Wheatley Solutions
- Wheatley Foundation

1.4   Additionally, it is recognised that the following business areas within the Group shall form a key role in their management of business continuity:
- Customer First Centre
- IT and Digital Services
- Neighbourhood Environmental Team (NETSs)
- Repairs Services

1.5   It should also be noted that City Building Glasgow (CBG) is a shared 50/50 split Joint Venture with Glasgow City Council and Wheatley Group. We will work with CBG to ensure that business continuity arrangements are coordinated to support delivery of an effective service.

1.6   In order to adequately address the need for Business continuity capacity to be maintained the Group will, in line with the principles of ISO 22301 carry out Business Continuity impact analysis and risk assessments, and depending on the outcomes of these pursue strategies and solutions which:
- meet the requirements to continue and recover prioritised activities within the identified time frames and agreed capacity
- protect the organisation's prioritised activities;
- reduce the likelihood of disruption;
- shorten the period of disruption;
- limit the impact of disruption on the organisation's products and services; and
- provide for the availability of adequate resources.

Further to the above analyses the Group will develop appropriate Subsidiary and Business Area Business Continuity Plans in order to minimise the impact of incidents when they do occur.

1.7 This Business Continuity Policy applies to all employees of the Group and its subsidiaries in supporting business continuity planning and its execution. Adherence to the Business Continuity Policy is an individual and corporate responsibility.

1.8 Should you require any assistance or guidance with any business continuity matter, please contact #wheatleyhealthandsafety@wheatley-group.com

| Section 2 |
| Aims and Objectives |

2.1 Regardless of the nature of the incident which causes a business interruption or impact, (for example pandemic, staff absence, power outage, digital information loss or destruction) there must be a documented and fully understood incident response structure in place. Our BC approach outlines the methodology for our BC response to an incident.

2.2 The purpose of this policy is to provide the foundations and set the approach around which the BC capability is designed and built, to ensure we have in place the preparatory measures to manage business interruption efficiently and effectively.

2.3 **Aims**

- To ensure critical services to customers and critical business processes are maintained in the event of a significant disruption to normal operations by introducing a consistent BC approach across the entire Group; and
- To ensure BC planning and management is successfully embedded, via the integration of the approach and processes with our strategic and day-to-day business practices as well as aligning it with business priorities.

2.4 **Objectives**

In order for an effective BC approach to be successfully embedded, our objectives are to:
- Appoint BC Leads and Co-ordinators in each of the Group subsidiaries and business areas;
- Establish BC Response Teams in each of the Group business areas to include a nominated BC Co-ordinator;
- Ensure that leaders and senior management take individual responsibility supporting BC across the Group and within each subsidiary;

- Ensure that roles and responsibilities are clearly defined and adequate training provided that is commensurate with the level of staff responsibility and involvement;
- Ensure that all departments undertake business impact assessment (BIA) to enable production of business continuity plans;
- Implement a BC approach supported by appropriate action plans and monitored by the Business Continuity Implementation Working Group, and co-ordinated by the organisational BC Lead;
- Identify and mitigate corporate BC risk by ensuring BC plans are developed, are in place and followed;
- Ensure compliance with all aspects of BC is achieved through a programme of monitoring;
- Promote continuous improvement of the effectiveness of BC by means of a suitable testing and exercise programme;
- Measure and benchmark our BC arrangements against best practice to ensure continuous improvement;
- Ensure all BC documents are readily available for all responsible parties, and that records of these documents are appropriately held in both hard copy and electronic format at appropriate locations as required; and
- Ensure BC is aligned with the Wheatley Group Crisis Management Plan.

Section 3
Roles and Responsibilities

3.1 General

3.1.1 For BC planning to embed successfully, clearly defined roles and responsibilities require to be assigned. It is essential that both management and staff take on an appropriate level of responsibility.

3.1.2 The following roles have been assigned as BC Leads across the Group to enable us to meet our BC obligations. Further details of their responsibilities are detailed in section 3.2 onwards below.

Subsidiary	Responsibility Holder
Wheatley Homes Glasgow	Managing Director
Wheatley Homes East	Managing Director
Wheatley Homes South	Managing Director
Loretto Housing Association	Managing Director
Lowther Homes	Managing Director
Wheatley Care	Managing Director
Wheatley Foundation	Managing Director
Wheatley Solutions	Director(s)
Business Area	**Responsibility Holder**
Neighborhood & Environmental Services	Director
IT & Digital Services	Director
Customer First Centre	Director

3.2 **Wheatley Group Chief Executive**

3.2.1 The Chief Executive has overall responsibility for business continuity within the Group.

3.3 **Director of Group Health and Fire Safety**

3.3.1 The Director of Group Health and Fire Safety will be responsible for the following:

- Review and development of Group Business Continuity Policy and Strategy documents at least every 3 years, or more often in the event of significant changes;
- Monitoring of compliance with the above by Group subsidiaries and business areas, including by implementation of a programme of regular audit according to activities and risk profile;
- Ensuring appropriate training on business continuity is provided and completed by all relevant role holders, and in particular their completion of 3 yearly BC E-Learning;
- Provision of guidance and assistance to all relevant role holders across the Group, as required, by dedicated staff specialising in BC; and
- Chairing of the Business Continuity Implementation Working Group.

3.4 **Group Directors**

3.4.1 All Group Directors have overall responsibility for ensuring that:

- BC arrangements within their respective subsidiary / business areas are in place;
- BC Leads are appointed to oversee and manage the BC response within their respective business areas;
- The necessary resources and support are provided to BC Leads to implement an effective BC response; and
- BC Leads are supported as necessary to act as a conduit for information between the BC Response Team and other Group Directors and Group Chief Executive Officer.

3.5 **Managing Directors and Directors (Business Continuity Leads)**

3.5.1 Managing Directors have overall responsibility for ensuring that:

- They act as the responsible lead person for business continuity within their respective business areas;
- BC response is co-ordinated as necessary;
- A BC Co-ordinator is appointed, and BC Response Team is put in place within their respective business areas for the effective management and maintenance of their business continuity plans and response;
- BC plans and the associated Business Impact Assessment are established and maintained within their respective business areas;

- Appropriate resources for the training of relevant members of staff and exercising of BC plans are made available to maintain their validity and effectiveness; and
- Information is collated and lessons learned from live business continuity incidents and test exercises and that these are share across their teams and the wider Group as necessary.

3.6 Business Continuity Co-ordinator

3.6.1 The BC Co-ordinator has responsibility for ensuring that:

- BC plans are developed, communicated and implemented within their respective subsidiary / business area; and
- BC plans are regularly reviewed, monitored and tested.

3.7 Business Continuity Response Teams

3.7.1 The BC Response Team led by the BC Co-ordinator will have responsibility for designing and implementing their respective BC plans and business impact assessment (BIA) in line with the principles of ISO 22301:2019, as well as monitoring BC activity across their subsidiary / business area. They will also be responsible for ensuring that:

- Adequate levels of general awareness are achieved regarding BC including being familiar with local BC plans;
- They are familiar with any specific role or responsibility assigned to them;
- They participate actively in BC familiarisation, training and exercises when required; and
- They familiarise themselves with and follow the principles outlined in section 4 of this document.

3.7.2 When a business disruption event occurs the BC Response Team, under the direction of the BC Lead and BC Co-ordinator has the following mandate:

- Ensure the safety of life over-rides all other considerations;
- Consult local BC plans and follow actions specified;
- Prioritise business critical services to be delivered over all others. Some non-critical business services may not be delivered during a disruption event;
- Instruct staff not to attend work or to deliver a limited service for the duration of the business disruption event and communicate their duties via a single point of contact;
- Offer staff and resources to other partners and statutory authorities;
- Instruct staff to follow direction of statutory authorities; and
- Request where required key suppliers provide appropriate resources.

3.8 Managers and Employees

3.8.1 All managers and employees will have responsibility to support the business continuity approach, including assisting with the development and testing of local BC plans, where necessary. Managers specifically, are also required to take part as required in the testing of the overall business BC plan.

3.9 Business Continuity Implementation Working Group

3.9.1 The role of the BC Implementation Working Group is to provide a forum to review and maintain our BC approach and BC arrangements, and also to share knowledge and experience of outcomes from BC events and testing.

3.9.2 The BC Implementation Working Group will meet every 3 months and be led by the Director of Group Health and Fire Safety. The Group will have representation from relevant business leads, for their respective business areas to review and maintain their business continuity plans and arrangements.

3.10 Group Health and Safety Team

3.10.1 The Group Health and Safety Team will implement a programme of regular audit of business continuity compliance across all Group subsidiaries and functions. Communication of the results of this programme, including any non-conformities identified and actions arising, will be made on an ongoing basis to the BCI Working Group.

3.11 Assurance

3.11.1 Business continuity across the Group may be subject to Group Assurance team audit, at the discretion of the Assurance Team.

Section 4
Business Continuity Plans

4.1 Subsidiary Business Continuity Plans

Each subsidiary will have a plan or plans to ensure that the subsidiary is able to respond to any incident affecting either the delivery of products and/or services to customers, or to an incident that directly affects customers' homes or personal safety, e.g. fire or flood. This includes a plan that addresses any incident affecting the building(s) in which subsidiary staff are based.

As a minimum, each business continuity plan should include the following essential elements:

- Responsibility for the BC plan
- Scope of the plan
- Roles and responsibilities in the event that the plan is activated
- Communication information (managers, colleagues, Group Services, suppliers)
- Link to area / local plans
- Testing regime

The Director of each subsidiary is responsible for the development and maintenance of its own business continuity plans. Each plan will be approved by the relevant Managing Director. The most senior officer at each separate building location is responsible for the plan for that building.

The Group policy recognises the need for consistency of approach but also recognises that each part of the Group is different – they have different geography, scale, properties and customers. Subsidiaries have responsibilities to respond to business continuity events affecting customers and may also have responsibility for delivering services from specific locations e.g. offices, depots.

4.2 Business Area BC Plans

Business Continuity plans will in addition be required in the following areas with cross functional responsibilities:

- Wheatley 360/ NETS
- Customer First Centre
- IT and Digital Services
- Repairs Services

4.3 Local Business Continuity Plans

Additional Business Continuity plans may be created where necessary to facilitate appropriate Business Continuity response. It is envisaged that such plans will be necessary, in particular, for functions carried out by Wheatley Solutions, Wheatley Care, CFC and Repairs.

4.4 Supplier Business Continuity Plans

A number of key suppliers have been identified whose business continuity plans are regularly reviewed in conjunction with testing of the Group's plans to ensure that there is understanding of respective roles and responsibilities in the event of a business interruption event. Failure of these could cause a business continuity event, affect our ability to respond to an event of our own or be required only in the event of a crisis.

4.5 Procedural Guidance for Business Continuity Events

In addition to specific Business Continuity actions contained within individual plans, the Group may develop and use as reference further procedures relating to topics considered to have widespread impact e.g. Severe Weather, IT disruption. These procedures may also have dual application in respect of issues dealt with under the remit of Group Crisis Management Plan.

4.6 Testing of BC Plans

A programme of regular testing of the effectiveness of all BC Plans will be undertaken by all BC Lead and BC Co-ordinators, according to frequencies and methodologies outlined in a separate BC guidance document developed for the Group, available on WE Connect.

The Group H&S Team will monitor outcomes of these test exercises and ensure that lessons learned are applied across all subsidiaries and business areas.

Section 5
Legal /Regulatory Approach and Guidance

5.1 The Group approach and approach used to develop our Business Continuity documentation has been derived using the principles of ISO 22301:2019 Security and Resilience – Business Continuity Management Systems.

5.2 In pursuit of implementation of this approach we will adhere to the principles of the General Data Protection Regulations where applicable

Section 6
Policy Review

6.1 This policy shall be reviewed three yearly; however, regular reviews will be considered where, for example, there is a need to respond to changes to legislation or technical guidance. Reviews will consider legislative, performance standard and good practice changes.

6.2 The Group will publish this policy on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages e.g. Braille.

Section 7
Equal Opportunities Statement

7.1 This Policy aligns the Group's Equity, Diversity and Inclusion (EDI) and Human Rights Policy. We recognise our pro-active role in valuing and promoting EDI and equity of opportunity by adopting and promoting fair policies and procedures.

7.2 We are committed to providing fair and equitable treatment for our stakeholders and will not discriminate against anyone on the grounds of race, ethnicity, nationality, language, religion, belief, age, sex, sexual orientation, gender re-assignment, trans history, disability, marital status, pregnancy or maternity.

7.3 As required, we carry out Equality Impact Assessments on relevant policies, strategies, projects and frameworks to help us take appropriate action to address positive negative impacts or maximise potential positive impacts.

Section 8
Relationship to Other Policies

8.1 This policy should be read in conjunction with the following documents which can be found in the Group Policy Approach and on the staff intranet:

- Group Risk Management Policy
- Group Records Management Policy
- Group Data Protection Policy
- Group Health and Safety Policy