Group Business Continuity Policy

June 2022

Contents

This Business Continuity Policy, approved by the Group Chief Executive Officer, establishes the Wheatley Group's commitment to its Business Continuity Management System aligned to the requirements of ISO 22301:2019 International Standard.

It is Wheatley Group policy to:

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

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

- Implement an appropriate business continuity strategy that meets the needs of the 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:

  o Have capacity to maintain or rapidly recover business critical activities.
  o Maintain the availability of key resources to support critical activities.
  o Prevent or limit the disruption to employees and our customers'.

- Define the roles and responsibilities of individuals' involved in business continuity 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 framework remains appropriate to its needs.

This policy, and its associated processes and procedures, provide 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.

Signed _____   Dated: 01 June 2022

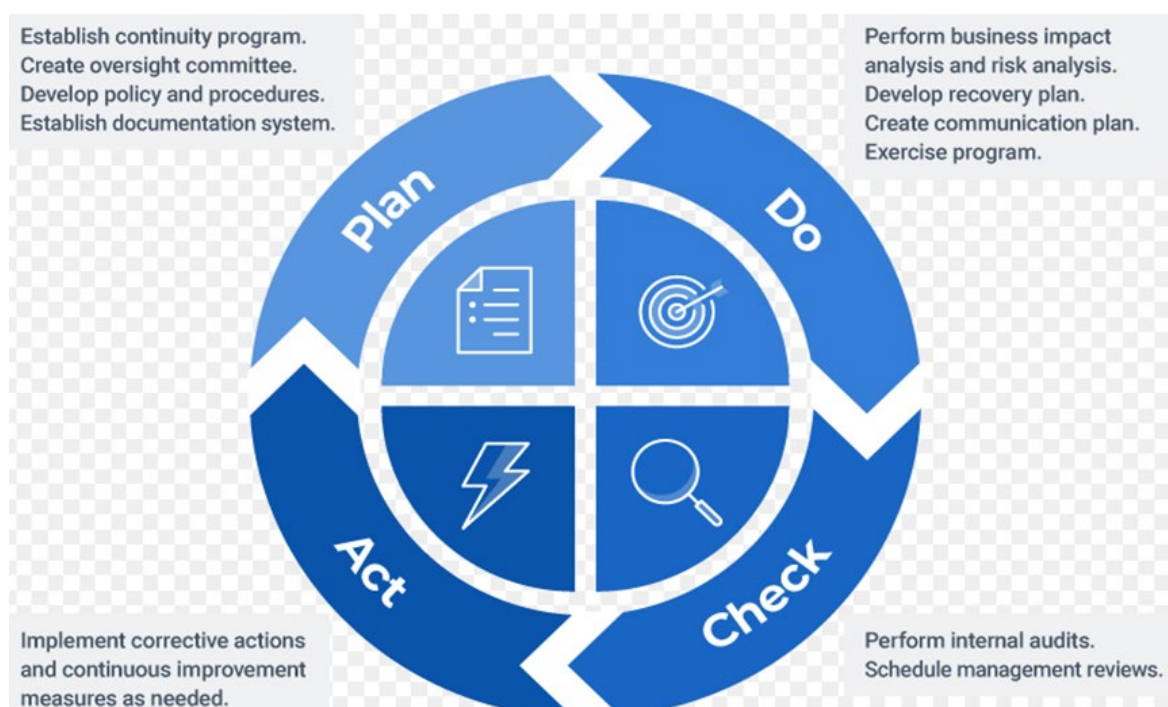**Steven Henderson (Chief Executive)**

The Wheatley Group Business Continuity Policy is intended to provide the foundations for the Wheatley Group and all subsidiaries ('the Group') around which the Business Continuity Management (BCM) capability is designed and built, to ensure we have in place the measures to manage business interruptions efficiently and effectively without escalating to a business crisis.

Business Continuity Management (BCM) 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 BCM arrangements and capabilities form an element of our overall risk management framework. It provides a structure for an effective response that safeguards the interests of key stakeholders, reputation, brand and value creating activities.

The establishment of a BCM Policy is recognised as good practice in line with the principles of the ISO 22301:2019 standard (as illustrated below). A BCM Policy provides the foundations around which BCM capability is designed and built.

This Policy covers the Wheatley Housing Group and all subsidiaries. All Wheatley Group employees, contractors, consultants, modern apprentices and all visitors to Wheatley Group business premises shall comply with this policy.

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

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.

Implement corrective actions and continuous improvement measures as needed.

Perform internal audits.
Schedule management reviews.

1.1   The Wheatley Group Ltd ('The Group') is Scotland's leading housing, care and regeneration group. We are a dynamic and growing organisation which currently comprises five Registered Social Landlords, Care subsidiary and Commercial subsidiary. The Group currently spans 19 Local Authority areas across Central Scotland.

1.2   Our Group subsidiaries are:

- Wheatley Homes Glasgow
- Dunedin Canmore Housing Association
- Loretto Housing Association
- West Lothian Housing Partnership
- Dumfries and Galloway Housing Partnership
- Wheatley Care
- Lowther Homes
- Wheatley Solutions
- Wheatley Foundation

1.3   Additionally, it is recognised that the following Business Areas within the Group shall form a key role in their management of Business Continuity:

- Wheatley 360
- Customer First Centre
- IT and Digital Services

1.4   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; failure to comply may result in disciplinary action.

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

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

Note: City Building Glasgow is a shared 50/50 split Joint Venture with Glasgow City Council and Wheatley Group. City Building Glasgow manage their own business continuity processes required to protect their organisation from the impact of any disruption.

2.1   Regardless of the nature of the incident which causes a business interruption or impact, (for example pandemic illness, power outage, digital information loss or destruction) there must be a documented and fully understood incident response structure in place. Our BCM system provides the framework for our BCM response to an incident.

2.2   The purpose of this policy is to provide the foundations and set the framework around which the BCM capability is designed and built, to ensure we have in place the preparatory measures to manage business interruption efficiently and effectively that does not escalate into a crisis.

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 BCM methodology across the entire Group.
- To ensure BCM is successfully embedded, via the integration of the framework 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 BCM framework to be successfully embedded, our objectives are to:

- Appoint Business Continuity Leads in each of the Group Business Areas.
- Establish Business Continuity Response Teams in each of the Group Business Areas to include a nominated Business Continuity Co-ordinator.
- Adopt a uniform approach to BCM across the Group which is captured through our performance management system
- Ensure that leaders and senior management take individual responsibility supporting BCM 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 risk assessments and business impact analysis to enable production of Business Continuity Plans
- Promote continuous improvement of the effectiveness of BCM by means of a suitable testing and exercise programme
- Conduct appropriate exercises and tests to validate the effectiveness of the

BCM arrangements and enable improvements to be made where necessary;

- Measure and benchmark our BCM arrangements against best practice to ensure continuous improvement
- Identify and mitigate corporate business continuity risk
- Ensure Business Continuity is aligned with the Group Crisis Management Plan.

Section 3
Organisational Benefits

3.1   There are many benefits to be gained by embedding good Business Continuity Management practices into our culture and organisation. These include:

- The safety and wellbeing of our staff;
- Protecting the Group's reputation and brand image;
- Minimise the impact of significant unplanned interruptions on customers and service users;
- Prevent or limit the impact beyond the Group and its operations;
- Demonstrate effective and efficient governance of business risks;
- Protect the Group's assets; and
- Meet insurance, legal and regulatory requirements.

4.1 For BCM to embed successfully, clearly defined roles and responsibilities require to be assigned. It is essential that all management and staff take on an appropriate level of responsibility.

4.2 The Group Board recognises that by working together to embed BCM within the Group's culture, we are building a framework for resilience and we will be better equipped to deal with potential threats to the Group.

4.3 The following accountabilities have been assigned across the Group to enable us to meet our Business Continuity Policy.

Subsidiary	Duty Holder
Wheatley Homes Glasgow (GHA)	Managing Director
Dunedin Canmore	Managing Director
Dumfries & Galloway Housing Partnership	Managing Director
Loretto Housing	Managing Director
Lowther Homes	Managing Director
West Lothian Housing Partnership	Managing Director
Wheatley Care	Managing Director
Wheatley Foundation	Managing Director
Wheatley Solutions	Director(s)
Business Area	**Duty Holder**
Neighborhood & Environmental Services	Managing Director
IT & Digital Services	Managing Director
Customer First Centre	Managing Director

4.4 **Wheatley Group Chief Executive**

4.4.1 The Chief Executive has overall responsibility for Business Continuity Management within the Group.

4.5 **Group Director of Repairs and Assets**

4.5.1 The Group Director of Repairs and Assets has overall responsibility for maintenance and implementation of this Business Continuity Policy. They will ensure the BCM system, policy and framework is reviewed, maintained and updated regularly or as required. They will report as necessary to the Group Board.

4.6 Group Directors

4.6.1 All Group Directors have overall responsibility for Business Continuity Management within their respective subsidiary / business area. Group Directors shall ensure that Business Continuity Management Leads are appointed to oversee and manage the Business Continuity response within their respective business areas.

4.6.2 Group Directors shall ensure the necessary resources and support are provided to Business Continuity Leads to implement an effective Business Continuity Response.

4.6.3 Group Directors shall provide support as necessary to Business Continuity Management Leads and act as a conduit of information between the Business Continuity Response Team and other Group Directors and Group Chief Executive Officer.

4.7 Managing Directors and Directors (Business Continuity Leads)

4.7.1 Managing Directors shall be the responsible lead person for Business Continuity Management within their respective business areas. Managing Directors shall co-ordinate the Business Continuity response as necessary.

4.7.2 Managing Directors shall appoint a Business Continuity Co-ordinator and Business Continuity Response Team within their respective business areas for the effective management and maintenance of their business continuity plans and response.

4.7.3 Managing Directors shall ensure that Business Continuity plans and the associated Business Impact Analysis are established and maintained within their respective business areas.

4.7.4 They shall further ensure that appropriate resources for the training of relevant members of staff and exercising of Business Continuity plans are made available to maintain the validity and effectiveness of Business Continuity plans.

4.8 Business Continuity Co-ordinator

4.8.1 The Business Continuity Co-ordinator shall be appointed by the Business Continuity Lead to oversee and manage the Business Continuity plans on a day to day basis.

4.8.2 The Business Continuity Co-ordinator shall be responsible for the development, communication and implementation of Business Continuity plans within their respective subsidiary / business area.

4.8.3 Business Continuity Co-coordinators shall ensure that the regular review, monitoring and testing of Business Continuity plans is implemented and maintained accordingly.

4.9   **Business Continuity Response Teams**

4.9.1   It is incumbent upon all business continuity response teams and employees to:

- achieve and demonstrate an adequate level of general awareness regarding BCM including being familiar with local BCM plans;
- be familiar with any specific role or responsibility assigned to them, and
- participate actively in BCM familiarisation, training and exercises when required.

4.9.2   The Business Continuity Response team led by the Business Continuity Co-ordinator will have responsibility for designing and implementing their respective Business Continuity plans and business impact analysis in line with ISO 22301:2019, as well as monitoring business continuity activity across their subsidiary / business area.

4.10   **Managers and Employees**

4.10.1   Whilst the responsibility for implementing this policy rests with our Board, Directors and Executive Management Team, it is incumbent upon all management teams and employees to embrace our Business Continuity arrangements as 'good practice', at all times.

4.10.2   All Wheatley Group managers and employees will have responsibility for compliance with this policy in their business area, and also to support the Business Continuity Management System (BCMS), including building and testing local business continuity plans, where necessary.

4.10.3   Managers specifically, are also required to take part as required in the testing of the overall business continuity management plan.

5.1   When a business disruption event occurs the Business Continuity Response Team, under the direction of the Business Continuity Lead and the Group Director has the following mandate:

- **The safety of life must override all other considerations**

- Instruct staff to follow direction of enforcement authorities.   Compliance is mandatory.

- Prioritise business critical services to be delivered over all others. Some non-critical business services may not be delivered during a business disruption event.

- Instruct staff to deliver prioritized business critical services instead of their normal job role. This may include delivering services for another Group subsidiary.

- Instruct staff to backfill for staff who are delivering prioritized business critical services. This may include delivering services for another Group subsidiary

- Instruct staff to deliver prioritized services or backfill roles will be of the appropriate skill-set and grade or trained to step up to role as part of business continuity planning.

- Instruct staff to attend work at an alternative location or work from home for the duration of the business disruption event

- Instruct staff not to attend work or to deliver a limited service for the duration of the business disruption event. All staff must follow instructions – safety of life must override all other considerations.

- Requisition resources including Group owned and leased vehicles and equipment from one part of the Group to be used by another part of the Group to deliver prioritized business critical services

- Offer staff and resources to other partners and statutory authorities

- Request staff and resources from other partners and statutory authorities

- Request key suppliers to provide staff and resources

- Instruct staff of their duties via a single line of communication managed through the Business Continuity Management Lead

- Prioritise IT services to support business critical services. IT services may not be available or be limited to some staff delivering non critical services.

Business Continuity Implementation Working Group

6.1   The aims and objective of the BCM Implementation Working Group is to provide a forum to review and maintain our Business Continuity Management Framework and Business Continuity arrangements, that is aligned to the Group's 5-year strategy and new operating model.

6.2   The BCM Implementation Working Group would seek to provide a collaborative forum to review and maintain oversight of existing Business Continuity Plans, offering a strategically focussed approach, aligned to new and emerging business risks, whilst maintaining key levels of service across the Group.

6.3   The Business Implementation Working Group shall be led by the group health and safety team and have representation from relevant business leads for their respective business areas to review and maintain their business continuity plans and arrangements.

Business Continuity Leads

6.4   The Business Continuity Lead and their respective Business Continuity Co-ordinator's shall monitor Business Continuity across their respective subsidiary / business area to ensure that plans are up-to-date and have been exercised to ensure they are fit-for-purpose and to rehearse those staff members who have a key role in the plan.

6.5   The Business Continuity Lead and their respective Business Continuity Co-ordinator will also collate lessons learned from live business continuity incidents and share them across their teams and the wider Group as necessary.

Assurance

6.6   A continuing process in the effective management of Business Continuity Management across the Group is the Business Continuity Management System, which is subject to Group Assurance team inspection.

6.7   A continuing process in the effective management of the Group's Business Continuity Management process is the requirement that the performance of the BCMS operated by the Group confirms that all parts of the organisation are adhering to best practice to protect us from potential threats.

Section 7
Equal Opportunities Statement

7.1   This Policy complies fully with the Group's Equal Opportunities Policies.   We recognise our pro-active role in valuing and promoting diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures.

7.2   We are committed to providing fair and equal treatment for all our stakeholders including tenants and will not discriminate against anyone on the grounds of race, colour, ethnic or national origin, language, religion, belief, age, sex, sexual orientation, gender re-alignment, disability, marital status, pregnancy or maternity. Indeed, we will positively endeavour to achieve fair outcomes for all.

7.3   We carry out Equality Impact Assessments when we review our policies. We check policies and associated procedures regularly for their equal opportunity implications. We take appropriate action to address inequalities likely to result or resulting from the implementation of the policy and procedures.

Section 8
Legal and Regulatory Framework

8.1   We adopt and regularly review best practice in BCM. We adopt best practice in line with the principles of British Standards Institute ISO22301:2019 and the Good Practice Guidelines issued by the Business Continuity Institute.

8.2   We recognise the Scottish Housing Regulator's Regulatory Framework an associated Regulatory Standards in relation to managing and mitigating risk

8.3   We adhere to principles of the General Data Protection Regulations.

8.4   An integral part of our risk management framework is to establish and maintain a BCM system.

Section 9
Policy Review

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

9.2   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 10
Relationship to other policies

10.1   This policy should be read in conjunction with the following documents which can be found in the Group Policy Framework and on the staff intranet, WE Connect:

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

Section 11
Document Control

Version	Date of Issue	Issued By	Authoriser	Comments
1.0		G	E McDowall	First Draft
2.0		E Conquer	E McDowall	Second Draft
3.0	1 June 2022	John Crooks	F McCafferty	Updated to reflect revised approach to BC Management incl BC Co-ordinator and BC Response Teams. Introduction of C3 command and control structure.

Date of Next Review: June 2025