



OP-POL-03 Business Continuity Policy

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1. Introduction

Framework is a complex organisation. Staff are based in offices and residential accommodation, providing housing, health, employment, support and care services to a large number and wide range of people.

People depend on these services, and the organisations that commission us to deliver them rely on us to keep them running, even in difficult circumstances. This policy forms the basis of our approach to Business Continuity Management (BCM), which is how we aim to achieve this. For simplicity, throughout this document, we refer to anything that might trigger a BCM response from us as a relevant event.

Some of our services are delivered in partnership with other organisations and, where this is the case, we will work with them to make sure our respective BCM plans dovetail effectively.

It is important to understand that, where the relevant event has an impact wider than Framework, our actions will be limited and may be controlled by statutory agencies.

2. What is Business Continuity Management in Framework?

Business Continuity Management (BCM) is about identifying the parts of the organisation that we can't afford to lose – such as information, stock, premises, staff – and planning how to maintain these, if an incident occurs.

Any incident, large or small, whether it is natural, accidental or deliberate, can cause major disruption. By planning rather than waiting for it to happen, we will be able to get back to business in the quickest possible time.

For clarity, we define business continuity management as a framework for identifying our risk of exposure to internal and external threats. The aim of BCM is to provide us with the ability to respond effectively to challenges such as:

- Natural events or disasters, for example flooding, severe weather
- Data breaches or major IT service interruptions
- Major loss of power or other essential service(s) to a building or buildings
- Major illness outbreaks including pandemic
- Loss of a building (administrative or residential) due to fire, explosion, etc
- External events, e.g. gas leak, major power failure, terrorism, etc, which prevent access to or use of essential buildings.

BCM is an established part of the UK's preparations for managing risks faced by organisations, whether from internal system failures or external emergencies. The Civil Contingencies Act 2004 recognised its importance by requiring frontline responders to maintain internal BCM arrangements and local authorities to promote BCM to commercial



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and voluntary organisations. BCM covers the range of our responses to these kinds of threats, including:

- Initial Response - incident management, critical phase management
- Continuity Phase - ongoing incident management after the initial phase, which could last a few hours, a few days, or a few weeks, depending on the nature of the incident
- Recovery Phase – starting to get “back to normal” after dealing with the challenges of the earlier stages of the incident
- Review Phase – learning the lessons from the incident(s) and our responses – what went well, what did not go well, who else could have been involved, etc

In developing our policies and procedures on BCM, we have made reference to ISO 22301. According to ISO 22301, a business continuity management system emphasizes the importance of:

- Understanding continuity and preparedness needs, as well as the necessity for establishing [business continuity](#) management policies and objectives
- Implementing and operating controls and measures for managing an organisation’s overall continuity risks
- Monitoring and reviewing the performance and effectiveness of the business continuity management system
- Continual improvement based on objective measurements

3. Business Continuity Leadership Group (BCLG)

The responsibility for BCM in Framework sits with the Business Continuity Leadership Group (BCLG).

The focus of the BCLG will be ensuring business continuity in relation to Property, Information Systems and People with more specific issues delegated into the subgroups or managed by the Health and Safety Steering Group.

The initial response to all business continuity events will be led by the BCLG - The BCLG may delegate the onward management of an event to one of the two subgroups. This will depend on the severity of the event or potential impact.

3a. BCLG Responsibilities

The Business Continuity Leadership Group is responsible for:

- Overseeing the development and maintenance of this policy and the associated policies and procedures



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- Monitoring the effectiveness of the relevant policies and procedures (see the table, Related Documents, at the front of this policy), including gap analysis with a view to identifying any potential omissions or weaknesses
- Co-ordinating and commissioning relevant training
- Continuing to promote BCM across the organisation
- Initiating Framework’s BCM procedures in the event of a relevant event
- Overseeing the implementation of those procedures
- Determining when it is appropriate to declare a relevant event is at an end
- Co-ordinating the review of our handling of the BCM process after the end of a relevant event
- Carrying out its responsibilities with the aims of:
 - Ensuring, as far as is practicable, the safety and security of service-users, staff and public
 - Minimising the financial impact of any relevant events including the consideration of an insurance claim or additional insurance cover.

3b. BCLG Membership

The BCLG core membership will be:

- Director of Corporate Services (Chair)
- Deputy Chief Executive (Vice Chair)
- Director – Health and Social Care
- Head of Infrastructure and Cybersecurity
- Assistant Director of SHEQ
- Assistant Director – Housing Services

Other managers or staff may be co-opted as necessary, having regard to the nature of the relevant event. The Chief Executive and Chair of the Board are *ex officio* members of the BCLG. They will not attend routine meetings, but may attend during any relevant event, in order to ensure effective communication.

4. Business Continuity Sub- Groups

There will be two Business Continuity Sub-Groups. One subgroup will lead on central functions and the other will lead on service delivery. The primary focus of the sub-groups will be to ensure effective BCP’s are available for all Services, Sites and Business areas.

In some circumstances the BCLG may delegate the onward management of a Business Continuity Event to either or both of the sub-groups.

Membership of Business Continuity Sub-Groups

The Corporate/Central Services subgroup will comprise of:

- Tenancy Services Manager



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- HR Manager
- Finance Manager
- Repairs and Voids Manager
- IT Team Leader

The Service Delivery subgroup will comprise of:

- Staff involved in delivering services across all elements of the organisations. Membership will be reviewed on an annual basis.

5. Planning for Business Continuity

Each service/business area/site within Framework will be responsible for drafting its own local BCP, in accordance with the available template. Once approved by the BCLG, copies of this plan will then be retained in an accessible format by the service itself, by the Out of Hours Service, and held on the Business Continuity Share-point Site

6. Plan Invocation

Any event which may disrupt business continuity should be reported immediately to a member of the Senior Leadership Team (SLT).

At the point of notification, SLT will invoke an initial meeting of the BCLG. Where appropriate the meeting may be held virtually using established communication methods such as Teams or Zoom. If a physical space is required it will become the focal point for the organisation's response.

The BCLG will review the event and determine the steps required for effective onward management. The factors determining the approach to BCM may include:

- The type of event – (people, property, information systems)
- The level of risk to BC (is it service specific or are wider parts of the organisation effected)
- Whether the nature of the event incident requires onward reporting
- Has there been a regulatory or legal breach?
- Does the event pose a risk to the organisation's reputation?

7. Reviewing Business Continuity Events

When a business continuity event is closed the BCLG will be responsible for implementing a review. The review will verify that:

- BCM arrangements instigated during the event accurately reflected Frameworks objectives.
- Arrangements were fit for purpose, and appropriate to the level of risk presented.



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- BCM arrangements were successfully implemented.
- BCM arrangements adopt improvements identified during incidents.
- Any lessons learned throughout the incident are adopted into BCM planning and training.

8. BCM Arrangements

Business Continuity Plans will be reviewed

- Annually.
- When there are changes to site or service delivery.
- Following lessons learned

9. BCP Testing

This policy acknowledges that not all aspects of BCM can be tested, but some crucial elements can. BCM testing will take place at regular intervals, commissioned by the BCLG and facilitated by the Business Continuity Sub Groups. Testing may encompass one or more of the following:

- Discussion Based Exercise: This brings staff together to inform them of the plan and their individual responsibilities. It will also include a discussion of the plan to identify potential problems and solutions.
- Table Top Exercise: An exercise based around a specific BCM scenario, aimed at validating plans and rehearsing key staff. It should allow the scenario to unfold as if it were a real incident.
- A Live Exercise: Live exercises are a necessity for BCM scenarios, such as evacuation, that cannot be tested by other means.

All testing will be recorded and evaluated by the BCLG. The service should also engage in a debrief immediately after the exercise to extract lessons learned.

10. Training and Awareness

It is good practice to ensure that all staff who have business continuity responsibilities receive training on BCM. All members of the BCLG will be required to work through the Business Continuity Management Toolkit.

We will use the following mechanisms to raise and maintain awareness of BCM with staff to ensure that they are aware of why BCM is important to the organisation:

- involving staff in the development of the organisation’s policy;
- written and oral briefings;
- learning from internal and external incidents;
- discussion based exercises
- All new staff should be made aware of the organisation’s BCM arrangements on joining and this will form an integral part of the induction process.



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11. Media and Public Relations

It is vital, as always, that all media and PR enquiries are dealt with by the Communications Manager or an authorised deputy in the first instance. They will then involve an appropriate member of the SLT or Board as necessary. In line with Framework’s Media Policy, any member of staff receiving a direct approach from the media must politely refer that enquiry to the Communications Team, without responding to any questions regarding any possible events.

12. KPI’s

- % of individual BCP Plans reviewed annually – Target – 33%
- Number of tests of individual BCP carried out annually –Target - 4
- Number of QA checks carried out by sub-groups – Target - 22

Performance against these KPI’s will be reported annually at the Audit and Risk Management Committee and CLT on an annual basis