



Management Agent Business Continuity Plan

June 2024

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MANAGING AGENT BUSINESS CONTINUITY PLAN AND PROCEDURE

1. INTRODUCTION

- 1.1 This Business Continuity Plan (BCP) outlines the procedures St George Housing Limited (SGH) will follow to minimise service delivery disruption caused by the performance failure of our managing agents to deliver services or their liquidation/insolvency. The goal is to ensure that services continue, and tenants are safeguarded.

2. SCOPE AND OBJECTIVES

- 2.1 This policy applies to all volunteers and staff of SGH.
- 2.2 This policy objective is to:
- Ensure uninterrupted service delivery to our residents.
 - Comply with regulations set by the Regulator of Social Housing.
 - Provide clear steps for response and recovery in the event of service disruption.

3. KEY RISKS

- 3.1 Managing agent going into liquidation or insolvency.
- 3.2 Poor performance by managing agents necessitating intervention.

4. RISK TRIGGERS

- 4.1 SGH has built in risk triggers that act as early warning signs that the key risks above may crystallise. See Risk trigger guide at Appendix 1.

5. RESPONSE STRATEGY

- 5.1 Initial Assessment and Activation of BCP.
- 5.2 Upon notification of a potential service disruption, the following steps should be taken immediately:

6. NOTIFICATION AND COMMUNICATION

- 6.1 Notify the SGH Senior Leadership Team.
- 6.2 Communicate with the affected managing agent to understand the extent of the issue.
- 6.3 Inform key stakeholders, including residents, local authorities, and the Regulator of Social Housing where applicable.

7. ASSESSMENT

- 7.1 Conduct a rapid assessment to determine the impact on service delivery.
- 7.2 Identify immediate risks to residents, particularly those related to safety and housing security.

8. MANAGEMENT AGENT LIQUIDATION OR INSOLVENCY

- 8.1 Verify the liquidation or insolvency status through legal channels.
- 8.2 Activate emergency funds if necessary to ensure continued service delivery.
- 8.3 Engage with alternative managing agents to take over the management of affected properties on a temporary basis.
- 8.4 Inform residents about the situation and ensure their immediate needs are met.

9. POOR PERFORMANCE BY MANAGING AGENTS

- 9.1 Conduct a detailed performance review.
- 9.2 Implement improvement plans with specific timelines.
- 9.3 Monitor progress closely and provide additional support if required.

10. SERVICE CONTINUITY MEASURES

- 10.1 Assign SGH staff or temporary managing agents to take over the management of affected properties.
- 10.2 Ensure all legal and regulatory requirements are met during the transition.

11. RESIDENT SUPPORT

- 11.1 Set up a dedicated helpline for affected residents.
- 11.2 Provide immediate support services using SGH's pre-approved managing agents.

12. FINANCIAL MANAGEMENT

- 12.1 Ensure continuity of housing benefit/UC payments to prevent financial disruption.
- 12.2 Activate emergency funds to cover any immediate financial shortfalls.

13. LONG-TERM SOLUTIONS

- 13.1 Review and revise contracts with managing agents to include more robust contingency clauses.
- 13.2 Consider performance-based renewal options for SLA contracts.

14. PARTNERSHIP DEVELOPMENT

- 14.1 Strengthen partnerships with local authorities and other managing agents to enhance support networks.
- 14.2 Continue to develop a pool of pre-approved managing agents who can step in quickly during emergencies.

15. TERMINATION OF CONTRACTS

- 15.1 As a last resort, if a managing agent cannot meet the required standards, initiate the process to sever the contract.
- 15.2 Ensure a smooth transition to new managing agents or direct management by SGH.
- 15.3 Communicate clearly with residents about the changes and ensure their housing needs are met during the transition.

16. RECOVERY PHASE-Post-Disruption Review

- 16.1 Conduct a thorough review of the disruption and the response to identify lessons learned.
- 16.2 Update the SLT based on findings to improve future responses.
- 16.3 Present the lessons learnt report to the Board and incorporate findings into a time-based action plan.
- 16.4 Review and update risk register.

17. RESTORATION OF NORMAL OPERATIONS

- 17.1 Work towards restoring normal operations as quickly as possible.
- 17.2 Continue to monitor the performance of new or temporary managing agents to ensure stability.
- 17.3 Monitor, follow up and implement action plan.

18. COMMUNICATION PLAN

- 18.1 Regular updates to residents through letters, meetings, and a dedicated helpline/what's app group.
- 18.2 Continuous communication with local authorities and other key stakeholders.
- 18.3 Transparent reporting to stakeholders about the status of the disruption and recovery efforts.

19. CONTACT INFORMATION

- The BCP Team is made up of members from the Senior Leadership Team.
- BCP Team Leader: Monty Kareem, Director of Operations at support@stgeorgehousing.co.uk
- Emergency Helpline: 07554583155 (also available to WhatsApp).
- Blackpool Council Contact: Jamie Weston at Jamie.Weston@bch.co.uk
- Coles Managing agent contact: Stephen Coles lettings@cpmblackpool.co.uk

19.1 This plan is approved by the SGH Senior Leadership Team and will be activated by the BCP Team Leader in the event of a service disruption.

20. LEGAL FRAMEWORK

20.1 The legal framework that underpins the policy takes into account the following legislation, regulation and codes of practice.

- The Housing Act 1985, 1988, 1996
- The Equality Act 2010
- The Housing Regeneration Act 2008
- Prevention of Eviction Act 1977
- Homelessness Reduction Act 2017
- Localism Act 2011
- Insolvency Act 1986
- Data Protection Act 2018
- Civil Contingencies Act 2004
- ISO 22301:2019 - Security and resilience - Business continuity management systems

20.2 This policy complies with Regulator of Social Housing (RSH) Standards.

21. EQUALITY IMPACT ASSESSMENT

21.1 In writing this policy we have carried out assessment to ensure that we are considering, equality, diversity and inclusion. Our assessments did not indicate that any group had been adversely impacted by our approach managing service disruption.

21.2 We have also carried out a privacy impact assessment as information regarding applicants is sensitive. However, responsible information sharing plays a key role in the delivering our services. We follow information sharing protocols with local authorities and our partner where they in place.

- 21.3 To request copies of these assessments, please contact
Gdpr@stgeorgehousing.co.uk

22. RELATED INTERNAL POLICIES

- 22.1 Business Plan
- 22.2 Risk Management Strategy
- 22.3 Business Continuity Plan
- 22.4 Management Information Framework
- 22.5 Management Arrangements Framework
- 22.6 Internal Control Framework

23. CONSULTATION

- 23.1 This policy will be reviewed in consultation with the Senior Leadership Team.

24. REVIEW AND APPROVAL

- 24.1 This policy will be reviewed at least every 2 years or after any major incident to ensure its effectiveness and relevance.

Responsible officer: Chief Executive
Policy Author: Director of Governance
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Date the next review is due: June 2026