Business Continuity and Disaster Recovery Plan

NOTE That this plan should be read in conjunction with the *Risk Assessment and Business Impact Analysis* included in the *ANA Risk Management Policy*.

NOTE that this plan refers to emergencies and disasters affecting ANA directly. It is distinct from the *ANA Catastrophe Plan* which guides ANA's provision of loss adjusting services to areas where a catastrophe has been declared.

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Contents

Overview

Covers all critical operations.

This *Business Continuity and Disaster Recovery Plan* addresses business continuity risks across all areas of ANA's operations, focusing on the maintenance of Client services (primarily loss adjusting).

See below under headings:

- *Risks critical to service continuity (short to medium term)*
- *Risks critical to service continuity (long term)*

Based on a risk assessment and business impact analysis

This plan considers all types of risk identified in the *Risk Assessment and Business Impact Analysis* which is presented in ANA's *Risk Management Policy* and covers all risks critical to ANA's continuity of supply.

The *Risk Assessment and Business Impact Analysis* is subject to ongoing, quarterly and comprehensive annual review by the Risk Management Committee (RMC) as set out in the *Risk Management Policy*, so it is kept up to date. It is also distributed to staff as part of ANA's risk awareness training.

Tested, reviewed, verified

Under this policy, ANA conducts at least annual tests of disaster recovery scenarios.

There is a formal procedure detailed in this policy that sets out how the tests will be conducted and evaluated and how learning from them will be applied to development of the policy.

This procedure allows for Clients to be present at and participate in scenario testing related to Client service continuity, on their request.

See below under heading *Scenario testing of this plan.*

Continuous improvement and updating

This policy is subject to continuous improvement from multiple sources, including analysis and recommendations from actual disasters dealt with, annual scenario-based testing, learning from relevant disasters world-wide and staff input.

See below under heading Continuous improvement of this plan.

Continuity risk analysis

There is a *Risk Assessment and Business Impact Analysis* covering all aspects of the business, included in the ANA *Risk Management Policy*.

The risk analysis presented here is more specific to business continuity, addressing risk to client services.

Critical components in ANA's delivery of client services are:

- People (especially Adjusters).
- Cloud-based data processing and storage.
- Communication including cloud and internet access.
- Transport.

While all these factors are vulnerable to risks identified on the *Risk Assessment and Business Impact Analysis*, the risks are significantly mitigated by ANA's structure, policies and procedures.

People

ANA Adjusters are dispersed across every state and territory of Australia.

Most identified risks are localised: likely to have any impact over limited areas. ANA staff from other areas would be able to cover those areas remotely and via temporary transfer.

The main risk to people that can cover broad areas is pandemic. In the recent COVID-19 pandemic ANA acted early to develop control policies and was successful in reducing office-based infection transmission, most especially by ramping up remote work.

Similar pandemics can be managed just as successfully.

Since COVID-19 we have continued to increase our remote work capacity, so we can do even better next time.

Office based staff are more vulnerable, but we are increasing remote capacity there as well. In addition, we have developed reliable offshore processing capacity that could be quickly ramped up to respond to an emergency.

Within the range of historical disaster events, the risk of client service disruption due to event preventing people from working is low at ANA. At most there will be day or two slow down while work is transferred and people moved.

Cloud-based data processing and storage

The inherently secure architecture of our cloud-based data systems have been enhanced by ongoing investment in cyber security measures, making disruption of client services due to cyber events a low risk for ANA.

All Client data is secured within our proprietary Claims Management Solution (CMS), developed over more than a decade. We do not keep local copies (for example on laptops or office computers).

Our people work on client documents within the CMS cloud: the data is not downloaded to their computer.

See the detailed ANA *IT Security Policy* for full details.

Our CMS is accessed via a remote desktop (not internet) with two level 2FA requirements. We have industry best-practice, 24-hour pro-active security. The CMS is hosted at a highly secure, Tier 1 facility within Australia and backed up to a second, separately located Tier 1 facility.

We have in place multiple recovery options that can have us operating again in 24 hours even after a total data or access loss.

Cyber security has been identified in several surveys as the number one threat to business continuity, but ANA's structure and procedures make cyber incident only a low risk of causing disruption to client services.

Communication including cloud and internet access

To be able to operate our Adjusters need to be able to communicate with the ANA CMS, with each other and with Clients.

Loss of communication would not stop the ongoing performance of assessments in hand. Adjusters would store data for later upload (as we do now in remote areas with no service).

All our Adjusters can access the CMS remotely via laptop and even mobile devices (phone and pad). As work is done in the cloud, bandwidth and speed are not critical.

Internet access can be via wireless internet or by phone connection, so there are back up options.

We can communicate with staff and clients via phone or email, so again there is always a back-up option.

A total collapse of services is of course possible, in which case ANA Client Service would grind to a halt in a couple of days, in affected areas.

However, in Australia a partial outage affecting one service for half a day is considered an outrage demanding a Royal Commission and compensation. An outage that would significantly affect ANA service delivery would have to cover most of the nation, last for days and affect both phone and internet.

Quite probably the ability of Insurers to function would be similarly curtailed by a complete collapse of communications, rendering ANA's service capacity moot.

Nevertheless, client services are vulnerable to widespread, extended, simultaneous collapse of both internet and phone services and ANA is unable to mitigate the risk of this happening.

Transport

ANA Adjusters often need to visit claim sites. This is usually by car. Fuel supply restrictions, and road damage including via environmental event and civil unrest could restrict this access.

In the event of prolonged fuel shortage ANA would prioritise fuel location to site visits, a step within the power of the Emergency Response Group (ERG). Subject to any legal restrictions we could also implement limited stockpiling.

Learning from the experience of COVID-19, ANA is working to increase its remote assessment capacity via strategies that could be implemented in emergencies.

Structure of business continuity & disaster recovery

The *Business Continuity and Disaster Recovery Plan* is managed day-to-day by the Risk Management Committee (RMC), as set out in the Risk Management Plan. The RMC has responsibility for its maintenance, updating and promotion to staff, including training, annual scenario testing and comprehensive annual review.

The plan may be invoked by the CEO or Managing Director (including people acting in these roles) and in specified circumstances by the Manager – Compliance.

When invoked, the first action is to convene an Emergency Response Group (ERG).

The ERG appoints an Emergency Response Controller to take executive command of the response. And a deputy. Resources and powers not normally used are available to the Emergency Response Controller.

The ERG notifies all ANA staff and all clients who might affected. Clients may send a representative to the ERG.

The ERG manages the situation through to resolution, with an emphasis on speedy resolution and maintenance of Client services.

Post-event the ERG reports in writing including recommendations for improvements to readiness and responses to future incidents.

Invoking this plan

This plan may be invoked (and revoked) by the CEO or Managing Director including people acting in these roles. In doing so, they may act on the advice and request of a State Manager or the Technical Manager. In the case of a cyber emergency if the CEO and MD are not immediately available the Manager – Compliance may invoke this plan.

Individual offices seeking to have this plan invoked should contact their State Manager.

This plan may be invoked for one ANA office, a group of offices, a state or nationally.

The primary condition for invoking this plan is that an exceptional situation is posing a critical threat to ANA's people, assets or business viability and this threat cannot be adequately dealt with using existing resources.

The provisions of this plan do not apply until invoked and cease when the emergency or disaster is declared resolved.

Actions on declaration of an emergency

Immediately on declaring an emergency the CEO or Managing Director shall, in order or priority:

- Mass email all ANA staff and contractors advising of the decision, the broad nature of the disaster and the geographical area covered. This email will ask staff to re-read this Plan, to refresh their knowledge, and will include a web link to the plan.

- Convene an ANA Emergency Response Group (ERG) and call it to a meeting to commence within an hour (this can be an online meeting).

- Contact senior ANA people in the emergency area to gather further information, that can be reported to the ERG.

Until the ERG meets, the CEO or Managing Director (whoever declared the emergency) shall be the Acting Emergency Response Controller.

Composition of the Emergency Response Group (ERG)

The ANA Emergency Response Group will include:

- The CEO and Managing Director, or their delegates.

- The relevant State Managers and (if the declared area is small) the relevant local Office Managers or (if the declared area is large) people appointed by the CEO or Managing Director to represent offices.

- The Manager – Compliance.

- Additional people with expertise relevant to the disaster, appointed by the CEO or Managing Director.

- Such other people as the group may co-opt based on their experience (eg, security, infection control) whether from within ANA or external.

- If required, a support officer to take minutes, manage communications and carry out delegated tasks.

- Clients may send a delegate to the ERG, on their request.

Meetings of the Emergency Response Group (ERG)

The ANA ERG at its first meeting in relation to a declared emergency shall:

- Appoint an Emergency Response Controller to oversee day-to-day operations, and a Deputy ERC.

- Map out and document a course of action in response to the emergency and disseminate this appropriately.

- Identify and document additional resources which may be needed to resolve the situation and advise the CEO of these.

- Set a schedule of meetings for the ERG. Attendance may be virtual. Communication outside scheduled meetings is expected. Any ERG member may ask the Controller to call an additional meeting of the ERG.

- Decide on an operating base for the ERG during the emergency and arrange necessary resourcing (communications, catering, accommodation, transport).

- The ERG may not need a physically proximate site, in which case the Controller may elect to have a different base, nearer the emergency site.

- ERG meetings will be chaired by the Controller or Deputy Controller.

- Set up a single number inquiry line and arrange for 24-hour response if needed. Display this number on the website.

- Prepare and arrange immediate distribution of an advisory statement to staff. Include emergency-specific contact details for staff to use if they have concerns or can provide relevant information.

- Prepare and arrange immediate distribution of additional advisory statements to contractors, to insurers and to current claimants if appropriate.

- Prepare advice on possible media responses for the CEO.

Decision making, management and oversight

The ERG acts under authority of the Board and is empowered to make all necessary decisions in relation to the declared emergency. ANA staff must give urgent priority to instructions from the ERG.

Meetings of the ERG will aim to make decisions by consensus but in the event that agreement cannot be reached in a reasonable time the decision may be made on a majority vote of all ERG members present (including electronically) who are ANA managers. The Controller (whether an employee or not) will have both a deliberative and if required a casting vote.

The Controller has full executive responsibility for all decisions relating to the emergency, between meetings of the ERG. These decisions may be reviewed by a meeting of the ERG.

The Controller must give the emergency response their top priority and should appoint someone to manage their normal workload as needed.

Similarly, the Deputy Controller should have a person ready to take over their normal duties whenever they as Acting Controller.

Decision style

Normal business operation seeks a balance between speed of action and the time taken to consider all viewpoints and allow all stakeholders a say, so that the most effective decision is reached.

In an emergency, the need for timely action is much greater and the decision balance shifts to speed of action. Speed of decision and action is paramount in an emergency.

Less time will be spent giving stakeholders a say and evaluating options. Normal evaluation, engagement and consultation may be truncated.

Naturally this increases risk in decision making, but in emergency and disaster situations timeliness of response is more important than achieving the absolute optimal response.

Just being seen to respond quickly often has a significant value in reassuring staff and participants and in calming the situation.

The decisions of the ERG should be made quickly.

Staff should not expect normal access to participate to the process, but they are needed to make a contribution: on-the-ground feedback on the effectiveness of decisions is more important than ever and should be made via local managers. Staff should not however expect the normal response and discussion.

Resources

By definition, an emergency/disaster is an event that cannot be resolved within existing allocated resources. A central function of this plan is to access adequate additional resources, including incident management.

An emergency or disaster is defined by requiring resources beyond those ordinarily available.

A key and urgent task for the ERG is to define what those essential additional resources are and obtain them.

Emergency resources

In an emergency the initial additional resources will be police/fire/ambulance.

Further resources will depend on the situation but may include:

- Counselling, for staff and others, especially in response to violence or other traumatic stress.
- Increased training for staff to deal with some unexpected situation.
- Repair or upgrade to an ANA facility, and perhaps temporary facilities.
- Isolation and disease control facilities.
- Rental vehicles, replacement phones and laptops.

Government and community resources

If it's a general disaster, extending beyond ANA, there may be government assistance available. The ERG should coordinate rapid application for this support.

There may be a community response which it is appropriate for ANA to participate in.

Continuity-of-business resources

The ERG shall evaluate the need for ANA to continue operations within the disaster area.

Operations within the area might be suspended for a defined period.

- Staff, contractors, insurers and claimants-in-progress will be notified urgently and advised immediate actions and a timeframe to recovery.
- ANA premises will be secured and repairs arranged if required.
- Staff may as necessary be evacuated from the disaster area.

The ERG may decide to continue at least some operations within the disaster area.

- Some services may continue being provided from outside the disaster area and information should be provided for this, including temporary contact numbers.
- ANA staff to be informed if they can continue working from other locations.
- Temporary local facilities might be established to enable at least some staff to continue work.
- The website should carry up-to-date information about changes to services.

Support to staff

Staff may not be able to work during the disaster recovery period. At a time of potentially reduced income, they may face significant extra costs. Uncertainty about the future could create significant stress.

The ERG will:

• Keep all staff and (as appropriate) contractors a fully and openly informed as possible about events and expected outcomes.

• Quickly obtain expert advice on staff entitlements and employer rights in the situation and assure staff that all their entitlements will be met.

• Confer with the Managing Director and CEO about possible additional support for staff when their legal entitlements and leave is exhausted, for example opportunities to work at other ANA offices, opportunities to continue work from home, a guaranteed pay period beyond their statutory rights, specialised assistance eg with children or disabled/aged dependents and extended periods at reduced pay. Additional support will be explained promptly and in detail to staff.

Wider engagement

Most disasters will affect more organisations that just ANA and they will have causes that are external to ANA and not all under ANA's control.

In such cases the ERG will:

• Engage broadly with other affected organisations especially within the insurance sector.

• Engage with affected organisations in other sectors.

• Engage with local, state and federal government authorities, as appropriate.

• Advocate for a government level response to the situation, that will help resolve it, and for government support to affected organisations.

• Recommend to the CEO a strategy for engaging with media that promotes hope for a positive outcome, with appropriate government support.

Most often for a disaster there will be some government-level response, for example financial support to individuals or organisations, emergency support from military personnel or new regulations affecting behaviour.

It is up to the response groups to maintain awareness of government actions, take full advantage of any support offered and ensure ANA's compliance with new legislation.

Sustainability

An emergency/disaster is defined as an event requiring additional resources, beyond normal, sustainable operations.

Responding to the event will impact on ANA's profitability.

Sometimes it will be beyond the capacity of ANA acting alone to resolve a disaster.

Responding to an emergency or disaster will thus **not** be sustainable for ANA in the medium to long term, unless additional funding is provided.

This means that placing a time limit, or at least a review period, on emergency/disaster responses is critical to ANA's security.

A primary function of the ERG is thus to:

- Assess the likely time for resolution of the situation.

- Assess the likelihood of receiving external resources.

- Estimate the trading losses and costs of additional resources ANA may have to meet during the resolution period.

- Recommend short and long-time strategies and structural changes to ameliorate these losses.

- Recommend a time frame after which the response should be reviewed, if no resolution is obtained.

- Recommend actions to reduce the likelihood of similar emergencies/disasters occurring in the future.

- Recommend whether to continue or exit the critical market.

Continuity of business services

A primary goal of disaster response and recovery is to maintain client services as contracted.

Any significant failure of service is an existential threat, involving immediate loss of income, quick loss of clients (who cannot suspend services) and reputational damage that could make it impossible to recover within a financially supportable time frame.

The ERG when invoked must respond first to any exigent threat to life or property (eg, a continuing fire, cyber attack, communications failure).

Once a response is in place and ongoing the ERG must focus on ensuring maintenance of client services as its top priority.

Drawing on any available resources as needed, it shall urgently assess:

- ANA's ability to deliver service to each client and each geographic area.

- ANA's capacity to deliver an adequate volume of services to each client, having regard to their demand levels.

- Factors decreasing capacity, such as stall or communications loss.

- Impediments to service delivery, and what can be done to overcome in the immediate and the long term.

Based on this assessment the ERG shall, in relation to staff:

- Temporarily reassign as needed any staff in non-affected areas to areas of greater need, including moving people interstate.

- Ask staff to work regular and if necessary significant paid overtime during the crisis period.

- Defer management projects to free management staff to engage hands-on where needed.

- Seek to employ additional temporary staff, as market conditions permit. This could include recently retired Adjusters and Adjusters taking family leave who might be able to work part time, especially from a home base.

- If the disaster is specific to ANA, seek to borrow Adjusters from other adjustment providers.

- Use readily available commercial services for functions like payroll, payments and recruitment, where these are affected by staff losses.

- Draw short term on staff, especially senior managers, within the global network of our parent company, VRS.

As noted in the Risk Assessment section of the ANA Risk Management Policy, ANA's management structure is relatively flat and at the operations level (Adjusters) can work quite autonomously at least in the short term. Adjusters are the major part of the ANA workforce and there are many qualified people who could be drawn on to replenish or expand this workforce. Vulnerability to loss of physical resources is low as services are not currently critically dependent on any location or infrastructure.

The ERG shall, in relation to physical resources:

- Ask staff to work from home where offices are not available or not at full capacity.
- Rent temporary office space for example in serviced office complexes or by approaching businesses in needed areas to rent excess space.
- Hire vehicles as needed.

As noted in the Risk Assessment section of the ANA Risk Management Policy, ANA's vulnerability to loss of physical resources is low as services are not currently critically dependent on any location or infrastructure.

The ERG shall, in relation to IT and communications resources:

- Purchase new phones, laptops, pads etc as needed over the counter, from stock.
- Engage professional IT recovery services based on existing contracts and expanding to new suppliers as needed.

As noted in the Risk Assessment section of the ANA Risk Management Policy, ANA's vulnerability to loss of physical communication resources is low as services are not currently critically dependent on any specific device or any one infrastructure installation.

Loss of key people

Loss Adjusters

The key people necessary to maintaining client services are Loss Adjusters. Our Adjusters are senior people who already work mostly autonomously. They could continue to work effectively with reduced head office resources for months.

Adjusters are numerically the biggest part of the ANA workforce and they are located across the country, so they are less likely to be completely lost. While ANA hires at the top of the qualifications and experience range, there is a national pool of Loss Adjusters ANA could hire from to recover losses.

Management

ANA's management structure is relatively flat and at the operations level (Adjusters) can work quite autonomously at least in the short term. A loss of management staff would not immediately threaten ANA's customer service capability.

Training, simulations and drills, audits and systems development might all be paused, but adjusters (who already work substantially autonomously) could continue at full capacity for months.

This would give ample scope for ANA to make changes to management and engage new people.

Some key parts of management including financial oversight, wages and payments processing and staff recruitment could be outsourced as there are multiple commercial suppliers and independent contractors already used routinely by many companies.

We also can draw short term on managers within the global network of our parent company, VRS.

Support staff

ANA has used technology and systems to minimise and standardise support tasks.

While we value and have invested in our current support staff, the skill level needed is not exceptional and there is a ready supply of potential new support staff if needed.

Termination and final report

From response to recovery

The role of the ERG is to respond to exceptional events which threaten client services and general business continuity, via actions that contain the impacts and as necessary create new ways of working.

Once the active threat is contained and essential services restored, the business enters a recovery phase and the work of the ERG, with its exceptional powers and resources, is finished. The recovery process begins.

Terminate quickly

As noted, declared emergencies/disasters and the special measures they invoke are a temporary arrangement.

The aim of the ERG is to return operations to normal (or perhaps a "new normal") as quickly as possible. This means that the need for immediate access to extra-to-normal resources is ended and the continuation of the business is sustainable.

Control returns to the normal management structure.

The handover should be early, not late. The situation need not be perfect or exactly as it was before; it must only be within the capacity of normal management and resources to complete the recovery process and move forward. There may still be some extra work to be done, but the crisis and existential threat is over.

Quick resolution and termination of the declared emergency speeds the overall business recovery.

Final report and recommendations

The last official act of the Controller shall be to submit a written and verbal report to the CEO.

This report should be in two sections, including:

Review of disaster cause and ANA response

- A concise description of the course of the emergency or disaster.

- An analysis of its causes.

- An assessment of its severity.

- A summary of all actions taken, whether failed and discontinued or successful and continued, and the outcomes.

- A summary of the final outcome, including quantification of any interruptions to Client services (especially loss adjusting).

- An assessment of ANA's performance in managing the emergency or disaster, with particular comment on continuity of Client services.

- An assessment of the costs of the disaster, including cost of response, additional resources and lost business, and human costs.

- A review of any lasting impacts of the disaster, especially changes to the business landscape (a "new norm") such as is happening post-COVID-19.

- Advice on changes needed to manage any lasting impacts, including additional ongoing management focus, meetings and resources.

- As assessment of possible benefits of the disaster response experience.

Recommendations

- Recommended changes to this plan.

- Recommendations to enhance preparedness and response to future disasters, especially in relation to continuity of Client services.

- Recommendations regarding staff training and culture.

- Recommendations for managing the recovery process.

Developing the Business Continuity and Disaster Plan

Disaster plans, perhaps more than most plans, require constant development and improvement.

Things change and every disaster is in some way new and different.

New types of disaster emerge.

Because disasters happen infrequently, there is limited scope to build experience, but maximum scope for bad outcomes. Getting the planning right is the best way to deal with this: good planning reaches its maximum payoff in a disaster.

Continuous improvement of this plan

This policy is subject to continuous improvement from multiple sources, including analysis and recommendations from actual disasters dealt with, annual scenario-based testing, learning from relevant disasters world-wide and staff input.

As disasters are rare and varied, practical learning opportunities are limited.

Annual scenario-based testing is the main hands-on review tool.

ANA also draws on incidents world-wide, where lessons may be applicable locally. This happens through general and industry media and more formally via our global parent, VRS, which gives us access to more detailed information about global disaster outcomes.

Staff are encouraged through ANA in-house training and by management lead to take an interest in disaster incidents affecting insurance organisations, to alert management and to make suggestions. Managers are expected to maintain broad industry knowledge and awareness as part of required professional development.

Reporting is to managers and via them to the CEO. Information is reviewed by the CEO and forwarded as appropriate to them Risk Management Committee for discussion, further research, recommendations and changes to this policy.

In this way ANA maintains continuous improvement to its business continuity and disaster recovery stance.

Scenario testing of this plan

ANA conducts annual, scenario-based testing of it critical functions, including cyber security and disaster response.

This testing is directed by the Manager – Compliance, in consultation with the CEO and Executive Chairman.

Each test results in a written report to the CEO, which is available to Clients on request.

Procedures for continuous development of emergency plans

The greatest opportunities to improve disaster plans are immediately after a disaster.

- After a disaster, suitably edited versions of Controller's final report will be distributed to staff, contractors and insurers and a version will be available on the website.
- Staff will be invited to attend an on-line presentation and Q&A by the Controller.

- Staff will be encouraged to make written submissions reporting their experiences of the disaster, what helped them (and what didn't) and their suggestions for the future.

- A Post-disaster Review Committee will be created, including appointees by the CEO/Managing Director and staff, who may be self-nominated or supported by other staff.

- This committee will meet as it thinks fit to arrive within six months at a written report proposing any needed changes in policies or settings and updates to the Disaster Plan.

- This report will be reviewed and actioned as decided by a committee of the CEO/Managing Director, General Manager and State Managers.

- In years where there is no disaster, the CEO or Managing Director will create a Post-disaster Policy Review Committee, to review all settings and report in writing within six months.

- The people on this committee should be substantially different each year and a person should serve as chair of this committee only once in a decade.

- This report will be reviewed and actioned as decided by a committee of the CEO/Executive Chair, Manager – Compliance and the State Managers.

- Review and improvement options that are not contingent on an actual disaster include and can be continuous include:

  o All ANA staff are encouraged (including via regularly training) to be aware of business disaster and continuity risks and issues and to comment on them to their manager, who refers suggestions to the Manager – Compliance.

  o Industry tracking via media, conferences, publications and contacts, to learn from what others in the sector are doing and especially their disaster response experiences.

  o Information and understanding gathered and developed globally by ANA parent, VRS.

Ongoing disaster recovery

Once the active threat is contained and essential services restored, so the disaster event is over, the business enters an ongoing recovery phase and the work of the ERG, with its exceptional powers and resources, is finished. The recovery process begins.

That doesn't necessarily mean a return to the pre-disaster "normal". Many disasters leave behind a permanently changed business landscape that is a new normal. This happened with the COVID-19 pandemic.

The ERG through its final report has a role in identifying characteristics of the new norm and especially areas where policy change is needed.

Making the ongoing adaptations needed (and seizing the opportunities presented) is rightly the role of the full management team, on their resumption of full responsibility. They work daily with the staff and clients, experiencing the issues and working to resolve them.

Following more significant events the CEO in consultation with the managers may decide to establish a temporary working commit to coordinate and monitor ongoing recovery, including making suggestions for changes in policy and procedures.

Additional funds and resources may be allocated as needed to implement approved changes.

The post-disaster period is also a time to consult with Clients and other stakeholders, to determine changes in their needs that may need to be addressed, and to share learning from the disaster.

Such actions are within the scope of normal management actions.