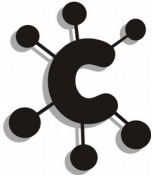


Community Connections Support Services

Risk Management Plan

2015



Community Connections Support Services

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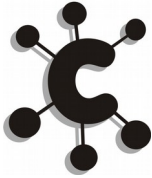
Risk Management Plan and Assessment 2015

Community Connections Support Services remains committed to long range planning to ensure service continuity and, therefore, to a formal and periodic risk management process. Specifically, the organization is committed to Risk Management as a way to:

1. identify any loss exposure
2. analyze and evaluate any loss exposures
3. identify a strategy (including action plans and time lines) to be taken to counter any potential losses or identified exposures,
4. implement the most effective strategy or plan to reduce risk for the organization,
5. provide for ongoing monitoring of any actions taken to reduce risk,
6. report result of action taken to reduce risks, and
7. include the results of risk reduction activities in performance improvement activities.

Identified Risk Exposure:

1. **Practice:** Currently, the agency supports three (3) people in Residential Services who present with significant behavioural issues. In the interest of preserving the safety of employees, the community and the individuals themselves, behaviour support strategies have been implemented in consultation with psychiatric evaluation, DDMH services and behavioural consultants. These strategies include restraint (both chemical and physical) and isolating the person supported.
Risk: Liability related to forced confinement and restraint. There is minimal severity and frequency of this risk. It is not likely that any of the people supported would file suit against the agency for the practice of restraint and confinement in behavioural support protocols.
Factors Increasing Risk: There is currently no consent obtained from these people to implement the restrictive practices and in some cases, obtaining consent would be problematic. In addition, agency policy and current behavioural support plans do not specifically address reinstating rights.
Mitigating Measures: Physical restraint is currently applied only in situations where it is clear that the person supported will or has engaged in assaulting others or self and is a response to prevent the person supported from engaging in this behaviour. Restraint is applied in compliance with MANDT system training and techniques and used only when necessary. Confinement is limited to situations where behaviour has escalated to the degree that danger to support staff is imminent. The person supported is not physically removed and confined but rather, support staff leave their area and lock the door to prevent attacks. Once the person supported has de-escalated, support staff re-enter their space to continue on with daily activities. Rights in this regard are reinstated completely and as soon as possible. All Behavioural Support and Safety plans are designed to work toward the elimination of these practices.



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Tracking Methods: Critical Incident Report forms and tracking charts are used to capture, report and monitor these instances.

Recommendations: CCSS will develop policy that specifically addresses behavioural support involving restraint and confinement. CCSS will liaise with the behavioural support agencies (such as Pivot Point) and request that current support plans and safety plans are comprehensive in addressing reinstatement of rights. CCSS will liaise with CLBC to ensure compliance with all regulatory standards and address larger liability issues and policy.

- 2. Practice:** Currently, CCSS owns the buildings where seven of the people supported in residential services live. The people supported in these homes pay rent back to CCSS. The agency is landlord.

Risk: Liability related to injuries sustained due to structural defects of property. Potential loss should CCSS lose contract to provide services. Potential audit related to rents collected.

Factors Increasing Risk: majority of properties are located in the West Kootenay area, While the Director resides in Kelowna. Properties may sustain damage due to behavioural challenges of some of the people residing in them.

Mitigating Measures: CCSS has enlisted stewardship support of properties located in the West Kootenay area from service coordinators in that area. Service Coordinators are responsible for monitoring on-going needs and providing remedy of any repairs needed. In addition, CCSS management addresses repair needs promptly and requests information from tenants regularly in relation to items requiring updating, fixing or replacement. Properties are kept in good repair and safe at all times. Insurance is comprehensive and up to date. Financial liability on mortgages is frequently reduced as funds permit. Financial records and accounting practices are kept up to date and meet regulatory standards for tenants as well as the agency.

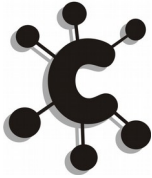
Tracking Methods: CCSS Director meets regularly with West Kootenay service coordinators and addresses tenancy needs. The agency has created an 'asset wish list' for tenants and support staff to complete annually. Items on this list are prioritized, budgeted for and delivered. The agency maintains comprehensive accounting records for the agency and tenants that reflect rents paid and collected.

Recommendations: Director is analyzing corporate structure with the intent to develop a holding company to limit risk to operations.

- 3. Practice:** CCSS is required to obtain consent for services from persons supported. Occasionally, support staff assist the person they support in providing consent for medical procedures, banking needs, etc. There are a number of people the agency supports that are not able to provide informed consent.

Risk: Consent obtained for any reason from a person who is unable to provide informed consent deems that consent void. In situations where the agency and its employees assist in making decisions for and with the person supported, the agency may be held liable for any loss incurred by the person served.

Factors Increasing Risk: the agency is reluctant to encourage legal representation for some of



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the people we support (ie. Representation agreements, committee, medical decision making) due to problematic relationships with family members. In addition, some of the people supported do not have family members who would be prepared to take on this role.

Mitigating Measures: all decisions made with and for the person supported are made openly and with the input from many qualified support staff, community professionals and agency policies that ultimately focus on best practices and the needs of the person supported.

Accountable practices are required by the agency.

Tracking Methods: CCSS continues to request signed consent from all service recipients. All decision making and access to services is well documented in support plans and reports.

Recommendations: CCSS is to continue to liaise with CLBC representation to discuss informed consent issues with the intent to have this addressed at a provincial level to inform agency practices.

4. **Practice:** CCSS pays employee wages as outlined in contracts with CLBC.

Risk: employee wages are not currently in parity with union rates. This impacts the agency's ability to retain employees when higher wages are offered for the same work with other agencies.

Factors Increasing Risk: CCSS will remain a non-union organization.

Mitigating Measures: the agency continues to provide for regular wage increases dependent on funding. We continue to advocate for higher employee wages to be included in contracts from CLBC. CCSS demonstrates an interest in employee satisfaction and explores other benefits and opportunities for employees in lieu of wage increases.

Tracking Methods: we consistently request feedback from employees regarding ways to improve their job satisfaction. The agency also tracks retention rates annually.

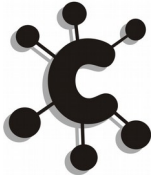
Recommendations: continue to approach CLBC regarding funding increases to allow for increased wages.

5. **Practice:** the agency screens and monitors its Home Share Providers to ensure safe and consistent supports for the people served.

Risk: Our contractors work in autonomous sites where oversight is less consistent than day-to-day. This has at times brought to light practices that have been allegedly abusive or neglectful. The agency may be held vicariously liable for the actions of its contractors.

Factors Increasing Risk: as noted, Home Share provision is very autonomous work and some of our contractors are resistant to monitoring checks being conducted by our agency and reporting responsibilities.

Mitigating Measures: we ensure that all required home checks are being conducted and we exceed standards in this area. The communities we provide services in have become more aware of the vulnerability of the population we serve and as a result, community members are more willing to file complaints or voice concerns regarding supports provided. The agency continues to implement all measures to ensure due diligence in ensuring the safety and well-being of those supported.



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Tracking Methods: we have several monitoring tools that we utilize to ensure that our contractors are adequately screened, meet qualifications, are trained in our policies and procedures and are familiar with our reporting requirements. In addition, any concern resulting in an investigation typically results in increased monitoring of services to ensure on-going safety and care of the people we serve.

Recommendations: some of our Home Share Coordinators keep detailed notes of all contacts made with their Providers. CCSS intends to streamline this process and utilize the information for tracking purposes.

- 6. Practice:** at present, we provide residential support to two people in the Kelowna area. One of these people lives with challenging behavioural issues that result in loud banging on the home's walls and windows.

Risk: We have received multiple complaints from a neighbour (living next to this home) claiming that the noise levels are disturbing and disruptive to them. The City of Kelowna has been involved in assessing the matter and the neighbour has made it clear that their wish is that these two people move out of their neighbourhood. This complainant may file nuisance charges against the agency in the interest of achieving their goal.

Factors Increasing Risk: It is unlikely that the 'banging' behaviour will abate soon. The neighbour has threatened to campaign to have these two people removed from the neighbourhood by enlisting petition from other members of the neighbourhood.

Mitigating Measures: CCSS, upon receipt of initial complaint, has erected a fence to absorb noise and has purchased and installed noise reduction wall treatment to minimize the noise levels. In addition, the agency speculates that this may be a case of NIMBY and believes that the action would receive little support from the city.

Tracking Methods: support staff for this person frequently measure and track noise levels at the property line using appropriate devices. Noise levels have not exceeded appropriate levels.

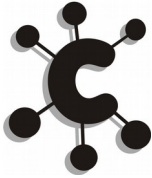
Recommendations: CCSS intends to continue to implement noise reduction methods and respond to complaints as we receive them. The agency will be planting shrubs along the property line to further reduce noise.

- 7. Practice:** Home Share services in the West Kootenays and in the Central Okanagan are provided by several agencies including CCSS. Service recipients have the ability to choose which agency they wish to receive services from.

Risk: CCSS may lose contracts for Home Share services if service recipients elect to receive those services from another agency at the outset or during their contract term.

Factors Increasing Risk: While the agency has worked at developing recruitment tools, we do not currently have presentations or advertising tools that provide for a competitive edge.

Mitigating Measures: our agency has gained a very good reputation in the communities where we provide services as being the agency of choice with our funder and current Home Share Providers. CLBC views our agency as setting the pace for Home Share services in these communities.



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Tracking Measures: we annually analyze acquisition and retention rates in Home Share services and are currently meeting our targets.

Recommendations: develop advertising tools to be presented to prospective Home Share recipients and contractors.

8. **Practice:** CCSS is a CARF accredited agency and is committed to continuous quality improvement and adherence to all CARF and CLBC standards and requirements.

Risk: each service area presents with a number of employees or contractors who are resistant to reporting requirements, the resultant paperwork necessary to meet accountability expectations and established time lines to complete and submit this paperwork. This may result in difficulty accomplishing CARF accreditation in an on-going way as standards require consistency across all areas which becomes difficult to demonstrate with records that are not consistent or complete. This may also result in an inability to adhere to regulations and policy expectations set out by CLBC. In addition, lack of required documentation results in difficulty for analysis and response by management in each service area.

Factors Increasing Risk: systems, tracking methods, data analysis has not yet been fully embraced and utilized by all those in leadership positions. This compounds the attitudinal resistance to the necessity of the information requested of front-line supports and the necessity for consistency.

Mitigating Measures: we continue to stream-line reporting requirements in all service areas and we have made slow progress in the comprehension and implementation of accountability measures.

Tracking Methods: record keeping practices illuminate areas where reporting requirements are falling short or lacking.

Recommendations: enlist involvement in planning processes from all service coordinators and provide more education regarding the necessity for consistent accountability practices.

9. **Practice:** CCSS has expanded its services and has had remarkable growth in the last number of years.

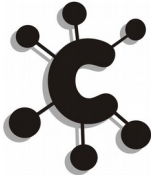
Risk: inability to meet all requirements with increase of workload demands

Factors Increasing Risk: funding limits the amount of positions available to assist in administrative management

Mitigating Measures: we continue to find ways to simplify administrative duties and delegate responsibilities to teams.

Tracking Methods: this is accomplished mostly through self-report from management. In addition, performance indicators are in place to measure efficiency, efficacy and accessibility to program outcomes.

Recommendations: re-visit management structure and identify changes required to ensure a balanced workload for management members.



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This report is generated and reviewed annually and is meant to be used in conjunction with all other CCSS performance reports. Review of this report, the action plans and time-lines are reviewed quarterly in the CCSS Performance Improvement Plan.

Date Report Generated:

April 2015

Date For Renewal:

April 2016

Report Generated By:

Jacqueline Burnham,
Quality Assurance Manager