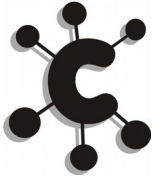


Community Connections Support Services

Risk Management Plan

2016



Community Connections Support Services

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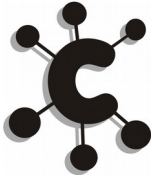
Risk Management Plan and Assessment 2016

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.

Strategies Implemented for 2015 Recommendations

1. 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.
 - The agency has developed comprehensive policy and procedures regarding restrictive practices, rights reinstatement and prohibited practices
 - The agency has ensured that all support protocols for those supported where restrictive practices are in place are comprehensive and clearly outline alternative behavioural strategies as well as the necessity to reinstate rights immediately.
 - The Director of Strategic Management regularly meets with CLBC representatives to discuss liability issues and policy directives regarding supporting those who display behaviours that present a risk to employee and public safety.
 - Recommendation to request support from community partners (CLBC, Pivot Point, posAbilities) is carried forward.
2. Directors are analyzing corporate structure with the intent to develop a holding company to limit risk to operations.
 - The Directors have begun the process of separating the company structure to provide for division between holdings and operations and are currently developing a plan with the company accountants.
 - Recommendation remains incomplete and is carried forward.

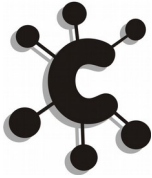


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3. CCSS is to continue to liaise with CLBC representation to discuss informed consent issues with the intent to have this addressed at a provincial level to inform agency practices.
 - The Director of Strategic Management has met with CLBC representation from Kelowna and the Kootenay area to discuss this issue and has been assured that the matter will be brought to CLBC head office.
 - Recommendation is carried forward until such time as we receive an action plan from CLBC.
4. Continue to approach CLBC regarding funding increases to allow for increased wages.
 - CCSS has recently received approval for a wage lift for employees.
5. 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.
 - This recommendation is carried forward for 2016
6. 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.
 - This recommendation is partially complete and no further complaints have been received. Planting shrubs is carried forward for 2016.
7. Develop advertising tools to be presented to prospective Home Share recipients and contractors.
 - This recommendation is in progress and carried forward to 2016.
8. Enlist involvement in planning processes from all service coordinators and provide more education regarding the necessity for consistent accountability practices.
 - This recommendation is complete. We were successful in our recent CARF survey due in part to a better understanding and richer collaboration among service coordinators regarding accountability practices.
9. Re-visit management structure and identify changes required to ensure a balanced workload for management members.
 - The agency has split the top level management to include a Director of Strategic Management. A Quality Assurance Manager has been hired in addition to identifying Senior Home Share Coordinators for each region.



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2016 Identified Risk Exposure and Recommendations:

1. **Practice:** CCSS has not conducted formal site specific, job related risk assessments for employees.

Risk:

- Non-compliance with WorkSafe BC regulations
- Possibility of increase in WCB claims due to work related injuries or under-reported injuries
- Possibility of higher turn over rates due to employees initially being unaware of inherent job related risks

Factors Increasing Risk:

- Lack of formal risk assessment related to specific service areas or work sites
- Lack of procedures requiring mandatory attendance of employees at training sessions specific to risk-reduction strategies
- Inadequate training regarding mandatory reporting to WorkSafe BC

Mitigating Measures: CCSS has thus far managed work place risk and work related injury successfully on a case by case basis with very low sick time utilization.

Level of Risk: Moderate

Recommendations:

- Develop comprehensive site-specific risk assessments
- Ensure risk assessment is part of all orientation for new employees
- Ensure that training associated with risk-reduction is mandatory for employees
- Track annual WCB claims
- Management is to become familiar with WorkSafe BC regulations and reporting requirements

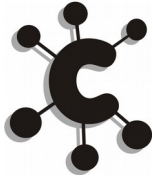
2. **Practice:** Currently, risk assessment for persons supported is addressed within annual ISPs.

Risk:

- Increased vulnerability to persons supported due to lack of information and planning
- Failure to safeguard for potential risk
- Inadequately trained support staff

Factors Increasing Risk:

- Section in ISPs related to risks to persons supported are incomplete or inadequate
- Lack of formal and separate risk assessment tool
- Risk assessment is not currently part of Emergency Management Plans (EMP)



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Mitigating Measures: The focus of the agency is on providing highly individualized support services and identifying risk factors are typically captured across several modes of communication and documentation practices.

Level of Risk: High.

Recommendations:

- Utilize risk assessment template for person supported
- Include risk assessment as part of a person's annual ISP and EMP and update/review annually
- Risk assessment for person supported is to be included as part of orientation and on-going training for employees

3. **Practice:** Behavioural support planning is completed by an external agency contracting with CLBC and does not formally address reinstatement of rights, risk to public safety and safeguarding others in the home.

Risk:

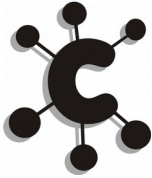
- Possibility of misuse/abuse of restrictive practices due to a lack of identification of reinstatement of rights
- Possibility of threat to public safety where person supported exhibits violent behaviour leading to criminal charges against the person supported or damages sought from the agency
- Lack of provision for safeguarding others in the home, including others receiving supports; resulting in injury or abuse

Factors Increasing Risk:

- The agencies responsible for behavioural support planning are external to CCSS
- CCSS is expected to follow all protocols established in behavioural support plans and safety plans
- CCSS is not at liberty to make changes to or amend information in behavioural and safety plans
- Pivot Point has been approached and is reluctant to make any changes to their procedures and reporting criteria at this time

Mitigating Measures:

- CCSS has developed its own policies and procedures regarding reinstatement of rights related to restrictive behavioural support practices
- CCSS is scheduled to meet with PossAbilities to discuss concerns
- CCSS has met with CLBC regarding liability concerns, risk to public safety and behavioural support planning.



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Level of Risk: Moderate to High

Recommendations:

- Continue to approach CLBC, Pivot Point and posAbilities to amend policies and behavioural support planning criteria to include above noted concerns
 - Ensure that CCSS employee risk assessments are included as part of overall behavioural support information
 - Develop comprehensive safeguard plans for risk to others in the home
4. **Practice:** CCSS requires employees to provide evidence of established minimum business use insurance on personal vehicles used for work purposes. CCSS does not currently enforce this requirement for employees working at residential resources with an agency owned vehicle.

Risk:

- In the event that an agency owned vehicle is found inoperable and it is necessary to transport a person supported from their home (ie. emergency), the agency has no way to verify adequate vehicle insurance.
- Difficulty recovering costs where uninsured or under-insured vehicles may be involved in accidents causing damages to company property

Factors Increasing Risk:

- Current emergency management planning does not consider implications of insurance / use of agency owned vehicles
- Personnel vehicles that may be uninsured or under-insured are currently parked on company owned property

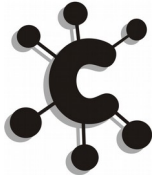
Mitigating Measures:

- CCSS currently holds non-owned automobile insurance that would cover any accident-related damages

Level of Risk: Low

Recommendations:

- Continue to request copies of current and valid auto insurance from all employees
- Ensure that employees are aware that a failure to produce auto insurance will likely exclude them from consideration for other positions in the agency where transportation is a job related requirement
- Ensure that employees are aware that they are not at liberty to claim any mileage expenses from the agency in lieu of current and valid copies of auto insurance, driver's abstract and BC driver's license.



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- Personally owned vehicles, where the owner has failed to provide current and valid auto insurance to the agency; will not be permitted to park on company owned property.

5. Practice: CCSS has created comprehensive privacy policy in accordance with the *Personal Information Protection Act* (PIPA)

Risk:

- Failure to fully comply with PIPA guidelines

Factors Increasing Risk:

- Not all management and personnel are familiar with the required practices outlined in PIPA
- Some current practices are inconsistent with PIPA guidelines

Mitigating Measures:

- Management and employees have been provided with access to updated CCSS privacy policies as well as a comprehensive guide to understanding PIPA guidelines.
- The QAM and Director of Strategic Management are currently evaluating information gathering and storing practices of the agency

Level of Risk: Low

Recommendations:

- Management to familiarize themselves with PIPA guidelines and pass along information to their teams
- Continue analysis of requests for information from employees and persons supported.

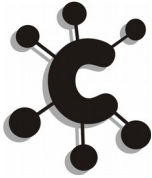
6. Practice: CCSS receives all referrals from CLBC, including information on supports required, historical information and any relevant medical information. Referral information can be incomplete.

Risk:

- CCSS is unable to create adequate support plans without comprehensive information.
- CCSS is unable to identify any risks associated with providing support and is therefore unable to inform caregivers and support staff of their exposure to risk and injury.
- CCSS is unable to determine appropriate safeguards necessary to keep all parties safe including others in the home.
- CCSS is unable to create supports that protect public safety when we are unaware of past criminal behaviour and/or charges.

Factors Increasing Risk:

- CCSS has been unable to obtain comprehensive files from CLBC due to privacy issues.



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Mitigating Measures:

- CCSS' accountability practices include making attempts to obtain previous information on person supported to maintain comprehensive files
- CCSS ensures on-going comprehensive information and files for persons supported

Level of Risk: Moderate to High

Recommendations:

- Continue to research and explore record sharing practices and regulations between support agencies
- Continue to research and explore PIPA and FIOPPA guidelines related to contracted services and disclosure of information to contractors.

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 2016
Date For Renewal: April 2017

Report Generated By: Jacqueline Burnham,
Director of Strategic Management