Section	Health and Safety Policy and Procedures
Subject	Incident Reporting (hs040)
Applies To	Employees and Subcontractors
Last Revised	February 2021

Policy: Community Connections Support Services (CCSS) strictly adheres to guidelines for reporting incidents established within CLBC and WorkSafe BC policy. All incidents must be documented and reports must be submitted within established time-lines to the appropriate persons / agencies. Employees and subcontractors will be trained in procedures for incident reporting including prevention, identification, reporting, and corrective actions.

Procedures:

What is a Reportable Incident?

In very general terms and for our purposes, a reportable incident is an event, situation or occurrence that affects the safety of a person supported or an employee.

Why Do We Report Incidents?

Incident reporting is *not* intended to be punitive or to assign blame to any party. Incident reporting is necessary to understand the causes of the incident, the impact of the incident on those we support and others, determine immediate action steps to recover from the incident successfully and analyze the incident to prevent future incidents from occurring. Incident reporting ensures that all those who need to know...do, so that we can all work collaboratively to provide safe services to those we support and safe work environments for our employees; as is our responsibility and obligation.

What Type of Incidents Do We Report?

CCSS and its employees and subcontractors are responsible for reporting the following types of incidents:

- Critical Incidents: Serious or unusual events that involve an individual accessing CLBC-funded services that occur *while service is being delivered* (this includes staffed residential and home share at all times). CLBC defines critical incidents to include the following:
 - a) An individual that is involved in or impacted by a critical incident
 - b) A critical incident, or an alleged or suspected critical incident of emotional, physical, financial or sexual abuse, or neglect, and

- c) An individual who witnesses a critical incident that is traumatic and violent (e.g. all types of abuse, aggression between individuals, incidents of aggressive/unusual behaviour).
- Non-Critical Incidents: Unexpected or unusual events that involve an individual accessing CLBC services that do not meet the CLBC definition of a critical incident.
- Health & Safety Incidents (employees only): Unexpected or unusual events that negatively affect
 or have the potential to negatively affect the general safety of a worksite or an employee while
 that employee is on duty.

Employee and Subcontractor Obligations for Incident Reporting

1. An Incident Has Occurred. What is the First Step?

Once an incident has taken place, the very first step is to secure the situation and respond appropriately to the incident to ensure everyone's safety. For guidance on emergency response, please see CCSS policies hs025 – hs039 to understand best practices on responding to a variety of incidents.

2. The situation has been secured. Now what?

Once the situation is secured and all parties are out of any immediate danger:

- the Employee must call or text their Service Coordinator immediately to let them know that an incident has taken place. The Service Coordinator is responsible to provide any additional direction on further action necessary to address the incident, if applicable.
- The Home Share Provider must call or text their Home Share Coordinator immediately to let them know that an incident has taken place. The Home Share Coordinator may provide suggestions on further action to address the incident.

3. The Service Coordinator or Home Share Coordinator has been notified and I have to complete an incident report form. How long do I have to complete and submit the incident report form?

All incidents, regardless of type, must be reported using the appropriate form within **12 hours** of the incident. The employee or Home Share Provider that has direct knowledge and observation of the incident must complete the incident report form to ensure an accurate account of the incident.

4. How do I determine the right incident type and category based on what has taken place so I know which report form to use?

When the incident involves or affects the person supported.

- 1. It is a reportable Critical Incident if it includes any of the following:
 - A person supported that is involved in or impacted by a critical incident
 - A critical incident, or an alleged or suspected critical incident of emotional, physical, financial or sexual abuse, or neglect, and
 - A person supported who witnesses a critical incident that is traumatic and violent (e.g. all types of abuse, aggression between individuals, incidents of aggressive/unusual behaviour).
 - Any incident that falls within the following categories based on definitions and criteria:
 - Emotional Abuse: Alleged or actual act or lack of action that diminishes an individual's sense of well-being and is perpetrated by a person in a position of trust or authority, including verbal harassment, yelling, or confinement. NOTE: Emotional abuse may include: intimidation, humiliation, withholding needed medication, censoring mail, invasion or denial of privacy or denial of access to visitors.
 - Financial Abuse: Alleged or actual misuse or abuse of an individual's funds or assets by a person in a position of trust or authority. Obtaining property or funds without the knowledge and full consent of the individual or a formal or informal representative.
 - ➤ Physical Abuse: Alleged or actual excessive or inappropriate physical force directed at an individual by a person in a position of authority or trust, including:
 - A staff member or volunteer, or
 - A person who is not responsible for providing services and is not a supported individual.
 - NOTE: The alleged or actual physical abuse is perpetrated against the
 individual. This critical incident type is never about the individual's actions
 towards a staff or any other persons. If an incident is about physical aggression
 by an individual towards another person (including another supported
 individual) refer to Aggressive/Unusual Behavior or Aggression Between
 Individuals.
 - ➤ Sexual Abuse: Alleged or actual sexual behaviour, directed at an individual, whether consensual or not, by a staff member, volunteer or any person in a position of trust or authority. Sexual behaviour may include inappropriate, unsolicited, or forced sexual attention. Sexual behaviour between two consenting individuals is not a critical incident.
 - Aggression between Individuals: Aggressive behaviour by an individual towards

- another individual that causes injury requiring first aid (e.g. bandage, ice pack), emergency care by a medical practitioner or nurse practitioner, or transfer to a hospital.
- Attempted Suicide: Attempt by an individual to intentionally self-harm for the purpose of taking his or her own life. Does not include suicidal threat or ideation.
- ➤ **Choking:** An individual's airway is obstructed, requiring first aid, emergency care by a medical practitioner or nurse practitioner, or transfer to a hospital.
- ➤ **Death:** Death of an individual while participating in a CLBC-funded service (e.g. residential support, community inclusion).
- ➤ **Misuse of Illicit Drugs or Licit Drugs:** Serious misuse of legal substances such as a prescription drug, marijuana or alcohol that requires medical attention. Any use of an illicit drug that requires medical attention.
- ➤ **Neglect:** Alleged or actual failure of a service provider to meet the individual's needs, including the need for food, shelter, medical attention or supervision, which endangers the individual's safety.
- ➤ **Poisoning:** Ingestion of a poison or toxic substance by an individual (excluding licit or illicit drugs).
- ➤ Use of Seclusion: Involuntary separation of an individual from normal participation and inclusion. The person is restricted to a segregated area and denied the freedom to leave it and is left alone. Use of seclusion must be reported as a critical incident. It may never be included in a Behaviour Support and Safety Plan.
- ➤ Weapon Use: An individual who uses or threatens to use a weapon to harm or threaten somebody. A weapon includes any object used to threaten, hurt or kill a person, or destroy property. Weapons may include but are not limited to loaded or unloaded firearms, knives, swords, mace, pepper spray or derivatives, and improper use of laser beams.
- Aggressive/Unusual Behaviour: Aggressive or unusual behaviour by an individual that results in harm and/or causes significant concern. Harm can be to property or to a person. Harm to a person can be physical or emotional harm, and can be towards themselves, another supported individual, staff, or others. Unusual behaviour means behaviour that is unusual *for the person*. Behaviours included in the Behaviour Support and Safety Plan **must** be reported **if** they are beyond what is included in, or effectively addressed by the Safety Plan **or** if they cause harm.
- ➤ **Disease/Parasite Outbreak:** An outbreak or the occurrence of a communicable disease above the level which is normally expected, including a communicable disease or parasite such as scabies. If you have any questions, contact your local health authority. Transmission can be by direct or indirect contact with infected persons or with their excretions (e.g. blood, mucus) in the air, water, food, or on

- surfaces or equipment.
- Fall: A fall that results in an injury requiring emergency care by a medical practitioner or nurse practitioner, or transfer to a hospital.
- **Medication Error:** Mistake in administering medication that:
 - Adversely affects an individual, and
 - Requires emergency care by a medical practitioner or nurse practitioner, or transfer to a hospital.
- ➤ Missing/Wandering: Unscheduled or unexplained absence of an individual from a CLBC funded service. An absence is considered unscheduled or unexplained if it is unusual for the individual, the service provider is unaware of their location, and the behaviour is not reflected in a Behaviour Support and Safety Plan.
- Motor Vehicle Injury: Injury to an individual as a result of a motor vehicle accident while participating in a CLBC funded service.
- ➤ Other Injury: Any other injury or assault to an individual (including those of a sexual nature, that do not meet the definition of Abuse) that requires emergency care by a medical professional or nurse practitioner, or transfer to a hospital.
- Exclusionary Time Out: Removal of an individual from a situation and environment for a period of time to prevent harm to them or others. It does not include positive redirection of an individual to a safe, quiet place. It differs from seclusion in that the individual is not left alone. Must be reported as a critical incident even when it is included in an approved Behaviour Support and Safety Plan.
- **Restraint:** Use of physical, mechanical or chemical restraints to temporarily subdue or limit the individual's freedom of movement, including containment. Containment means restricting an individual within a certain area (e.g. using a halfdoor or locked exits). Must be reported as a critical incident even when it is included in an approved Behaviour Support and Safety Plan. Refer to Critical Incidents: Restraint Exemption Framework for information about the specific conditions under which exemptions from the requirement to report use of restraints are allowed. NOTE: Restraints that are required for medical purposes only as prescribed by a health care professional (i.e. not required for behavioural purposes) are not considered restricted practices and do not need to be reported as critical incidents. These restraints do not require a Behaviour Support or Safety Plan, but do require a health care plan or a prescription from a health care professional identifying the need for the restriction. NOTE: PRNs are not intended to be used as a chemical restraint. They are intended to help individuals regulate their behavior and emotions. Since PRNs are not considered a restraint, they do not need to be reported as a critical incident. Service providers should keep records of an

- individual's PRN use to ensure proper management of an individual's medication.
- ➤ Restriction of Rights: Removal of an individual's access to activities. It does not include standard safety practices or reasonable house rules. Must be reported as a critical incident even when it is included in an approved Behaviour Support and Safety Plan.
- Service Delivery Problem/ Disruption of Services: Condition or event that could impair or interrupt the ability of a service provider and its staff to provide care to an individual and which affects the individual's health, safety, dignity, or well being. For example sudden illness of caregiver.
- ➤ Unexpected Illness/Food Poisoning: Illness of an individual requiring emergency care by a medical practitioner or nurse practitioner, or transfer to a hospital, including food poisoning. Food poisoning is a food borne illness involving an individual that requires emergency care by a medical practitioner or nurse practitioner, or transfer to the hospital. For unlicensed programs, any incidents of food poisoning must be reported as "unexpected illness" on the CLBC Critical Incident Report.
- 2. If the incident type does not meet any of the above criteria for a Critical Incident, it may be a Non-Critical Incident (NCIR). It is a NCIR if it includes any of the following:
 - A person supported that is involved in or impacted by an incident where that incident does not fall into the categories of a Critical Incident as defined by CLBC.
 - Any incident that falls within the following categories based on definitions and criteria:
 - Any injury that does not require emergency care by a medical or nurse practitioner or transfer to hospital.
 - Medication errors that do not require emergency care by a medical practitioner or nurse practitioner, or transfer to a hospital.
 - ➤ Choking that does not require first aid, emergency care by a medical practitioner or nurse practitioner or transfer to a hospital.
 - Aggressive behaviour by an individual that does not result in harm to any person or property and/or does not causes significant concern.
 - ➤ 'Near Misses' any situation that may have resulted in a critical incident but was avoided due to circumstances or intervention.
 - > Falls not requiring emergency care by a medical practitioner or nurse practitioner, or transfer to hospital.
 - ➤ Illness that does not require emergency care by a medical practitioner or nurse practitioner or transfer to a hospital.
 - ➤ Possession of a weapon such as loaded or unloaded firearms, knives, swords, mace, pepper spray or derivatives, and improper use of laser beams where the person does

- not use or threaten to use the weapon to harm or threaten somebody.
- Threats of suicide or suicidal ideation that does not result in attempted suicide.

 *Must inform the person's physician of suicide threat or ideation as well.
- ➤ Motor vehicle accident not resulting in any injury to the person supported.

When the incident affects an employee's safety while on duty or the overall safety of the worksite (Applies to Employees Only).

It is a reportable Health & Safety Incident (HSIR) if it includes any of the following:

- An employee is negatively affected or is unsafe while on duty.
- The general safety of the worksite is compromised.
- Any incident that falls within the following categories based on definitions and criteria:
 - Critical Health & Safety Incidents:
 - A worker is seriously injured or killed on the job. Serious injuries are those that are life-threatening or could cause permanent injury. Serious injuries include traumatic injuries such as major fractures, amputations, and serious burns. Serious injuries also include incidents such as exposure to chemicals and heat and cold stress, as these could result in life-threatening conditions or cause permanent impairment.
 - There is a major structural failure or collapse of a building, bridge, tower, crane, hoist, temporary construction support system, or excavation.
 - There is a major release of a hazardous substance.
 - There is a dangerous incident involving a fire or explosion that had potential for causing serious injury to a worker.
 - There is a blasting incident that results in personal injury or injuries.
 - Urgent Health & Safety Incidents:
 - employee sustains an injury and is taken from or leaves the jobsite for medical treatment
 - employee sustains a minor injury, or no injury, but the incident had the potential for causing serious injury
 - employee misses time from work after the day of injury
 - employee loses consciousness
 - employee is diagnosed with a work-related disease
 - employee develops symptoms of a mental health disorder related to work or the work environment
 - employee suffers broken eyeglasses, dentures, hearing aid or artificial limb due to a work-related incident
 - Violence in the workplace resulting in injury of an employee
 - Non-Urgent Health & Safety Incidents:

- Utility failure
- Communication failure
- Equipment failure
- Minor Structural Damage
- Natural disaster
- Contamination of drinking water or a boil water advisory
- Bomb threat
- Unsecured Medication
- Motor vehicle accident no injury (must also refer to hs110 Motor Vehicle Accident Reporting Policy)
- Third party injury
- Threat of violence in the workplace
- Violence in the workplace no injury.

5. Can an incident require completing more than one incident report?

Yes. Some incidents will require reporting on multiple forms because the incident has components of multiple types of reportable incidents. Below are a few examples of when this may be the case:

- 1. A CIR can only be used to report one critical incident for one person at one time. If multiple critical incidents occur in a day or around the same time, or there are two people supported who are affected by the same incident, separate CIR forms must be completed for each person and each incident.
 - eg. If there are two people receiving support who are involved in a Motor Vehicle Accident at the same time and both are injured, CIR forms need to be submitted for both person A and person B.
 - eg. If a person supported attempts suicide, is taken to hospital and dies later that day, two CIRs must be submitted Attempted Suicide and Death.
- 2. In some cases, an incident may have components of both a NCIR and a CIR. In this case, both report forms must be completed to report the incident.
 - eg. A person supported begins to choke but is coughing and manages to resolve the issue without any intervention (NCIR report for Choking). While the person was coughing and attempting to dislodge the food particle, the person fell and sustained an injury requiring emergency care at the hospital (CIR for Fall). In this case, both forms would need to be submitted.
- 3. Some incidents will require the completion of a CIR form for the person supported *and* a HSIR form for an employee.
 - eg. A support worker is assisting the person they support up a set of outdoor stairs. The stairs are icy and both the person supported and the employee fall. Both people sustain injuries. The person supported requires emergency care at the hospital for a cut on

their arm sustained during the fall. The person receives 6 stitches. The employee continues on with their shift but their wrist is red, swollen and sore. The next day, the employee visits their physician and is diagnosed with a sprained wrist. In this case, a CIR is submitted for the person supported for a Fall and a HSIR is submitted for the employee for Injury.

- eg. A person supported appears agitated and strikes out at the support worker. The person supported does not have a Behaviour Support or Safety Plan in place. The person supported strikes the support worker on their shoulder. While the support worker is not injured, they are very shaken and upset. In this case, a CIR is submitted for the person supported for Aggressive/Unusual Behaviour and a HSIR is submitted for the employee for Violence-No Injury.
- 4. Some incidents may require the completion of a NCIR form for the person supported *and* a HSIR form for an employee.
 - eg. A support worker is transporting the person they support in their vehicle. They are in a motor vehicle accident. Neither person sustains any injuries. In this case, a NCIR is submitted for the person supported for Motor Vehicle Accident not resulting in injury and a HSIR form is submitted for the employee for Motor Vehicle Accident.

6. Ok. I've determined the type of Incident and the category. Which report form do I use and how do I fill it out?

- The CLBC Critical Incident Report form and instructions for completing the form can be found in policy at hs041
- The CCSS Non-Critical Incident Report form and instructions for completing the form can be found in policy at hs042
- The CCSS Health & Safety Incident Report form and instructions for completing the form can be found in policy at hs043

7. I've completed the form to the best of my abilities. Who do I send it to?

- Employees must email all completed incident forms to their Service Coordinator *within 12 hours* of the incident.
- Home Share Providers must email all completed incident forms to their Home Share Coordinator *within 12 hours* of the incident.

Service Coordinator or Home Share Coordinator Obligations for Incident Reporting

Once the Service Coordinator (for Residential and Community Support Services) or the Home Share Coordinator (for Home Share Support Non-Urgent CIRs or Non-Critical Incidents) or the Service

Coordinator (for Home Share Support Urgent CIRs) is in receipt of the completed incident form, they are responsible for the following:

1. Review the Completed Form

The Service Coordinator or Home Share Coordinator is to review the completed incident report form and ensure that it is written correctly. This means:

- all fields are completed
- the correct incident category is chosen
- information is sequential (ie. clearly describes sequence of events)
- incident is reported based on its impact on the PS for CIR or NCIR.
- information is objective and strictly observational (ie no anecdotal information, no 'guesses', no speculation on how others 'felt' about the incident)
- there is clear description of steps taken to address or diffuse the incident

Additionally, any information that is missing must be provided before reporting to the relevant authority, such as:

- Actions necessary to prevent a similar incident from reoccurring.
- Updates to any plans or processes that are impacted and/or informed by the incident. May include:
 - For the person supported: ISP, Risk Assessments, Medical Consultation, Health Profile, Health Care Plan, Behaviour Support Plan, request for funding, training for employees or Home Share Provider, requests for referrals to other agencies, etc
 - ➤ For employees or the worksite: updating Employee Risk Assessment, policy review, training, requests for equipment or renovation, changes in protocols, etc.

2. Submitting the Completed Form to Correct Authority within Correct Timelines

Timelines for submitting incidents vary depending on the type of incident, urgency of incident and role of the person responsible for completing this step.

* For clear direction on reporting incidents to relevant authorities, please refer to workflows hs040.1 - hs043.1 for step by step instructions on reporting incidents, notifying relevant parties, storage and follow up.

3. Storing the incident report

Storage of incident reports vary depending on the type of incident and role of the person responsible for completing this step.

* For clear direction on reporting incidents to relevant authorities, please refer to workflows hs040.1 - hs043.1 for step by step instructions on reporting incidents, notifying relevant parties, storage and follow up.

4. Following up and closing the loop

Follow up for incidents may vary depending on the type of incident and role of the person responsible for completing this step.

* For clear direction on reporting incidents to relevant authorities, please refer to workflows hs040.1 - hs043.1 for step by step instructions on reporting incidents, notifying relevant parties, storage and follow up.

Agency Obligations for Incident Management

1. Incident Analysis

A written analysis of all agency critical incidents is completed annually in the Community Connections Support Services Annual Critical Incident Analysis. This formal review addresses the following:

- Identification of all Critical and Non-Critical Incidents across all services areas.
- Possible causes.
- Identified trends.
- Actions for improvement.
- Identification of necessary education and training of personnel and subcontractors.
- Prevention of recurrence.
- Internal reporting requirements.
- External reporting requirements.

The Annual Critical Incident Analysis is reviewed by leadership and actions for improvement are noted in the agency's quarterly Performance Improvement Plan.

2. Improving Resources

- Health and Safety: Community Connections Support Services has established a health and safety committee with health and safety officers posted at each service site. As part of our commitment to risk management and minimizing potential hazards, health and safety officers are expected to take note of any health and safety concerns, run drills and ensure emergency preparedness for the people they serve. Problem areas are to be addressed in a timely way and remedied as soon as possible. It is the expectation of CCSS that all personnel are familiar with Health and Safety Policies and Procedures as well as individualized emergency planning specific to the needs of the people they support.
- Individualized Planning: Each person supported has an up-to-date individualized planning document (ISP or 6 month summary) that identifies health concerns, potential risks to safety in all domains, as well as medical diagnoses and medication needs. All supports are to be familiar with this information and any protocols established and safeguards put in

place to ensure the safety and well-being of the person supported. Where applicable, comprehensive Behavioural Support Plans and Safety Plans are to be maintained for those requiring them as a proactive approach to minimizing risks for the person supported, personnel and the person's community.

- Training: Regular training in areas of health and safety such as: incident reporting, First Aid, MANDT, infection control, medication management, support protocols specific to the persons supported, evacuation procedures, emergency management, and risk management will be offered to all personnel, subcontractors and persons supported on an annual basis.
- Risk Assessment: Comprehensive and detailed risk assessments are completed for all
 employees and all those supported by the agency. Risk Assessments are reviewed semiannually to ensure that adequate controls are being implemented to reduce or eliminate
 risk.

References:

CLBC Critical Incidents Service Provider Requirements Guide, 2021 CLBC Critical Incidents Policy, 2021 CLBC Critical Incident Report, 2021 WorkSafe BC, 2021

For further information on this policy or permission to reprint, please contact:

Jacqueline Burnham, BA
Director - Strategic Management
Community Connections Support Services
275 Rutland Road North
Kelowna, BC V1X 3B1
ph. (250) 491-2907 fx.(250) 491-2920
jacqueline@commconn.ca
www.commconn.ca