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FLOWCHART

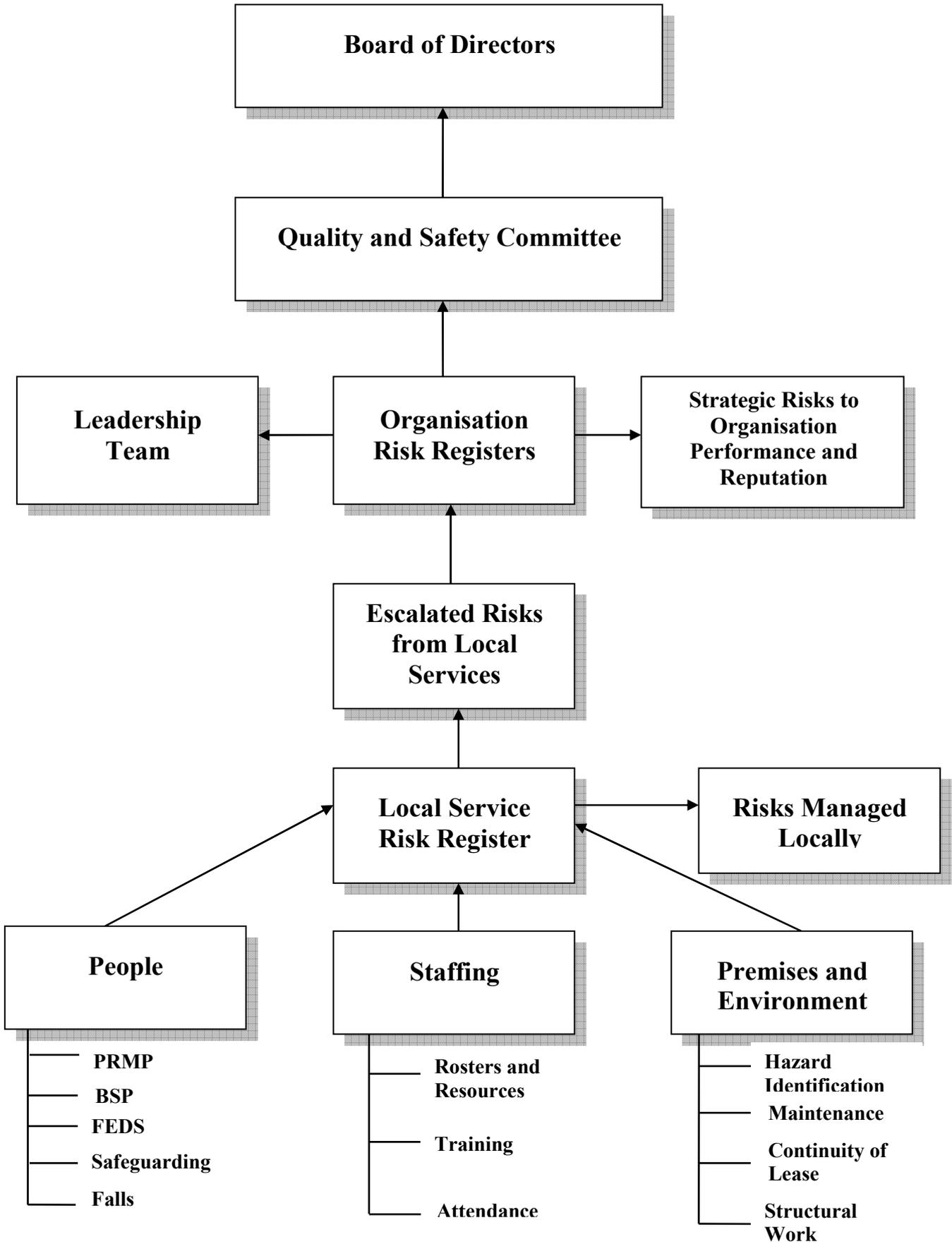


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Policy and Procedure Feedback Form

A Policy and Procedure Feedback Form is available on the Western Care Association Intranet (under Procedures) which will provide an opportunity to comment on any policy/procedure.

Your comments will be forwarded to the person who has the lead for the on-going development of the policy/procedure.

All comments will be collated by the person responsible and will inform the three-yearly review cycle for updating procedures.

1. Policy for Developing the Organisation and Local Service Risk Registers

As there are multiple processes involved in managing risks at an organisational level there is a need for a single overview of risk. The design of the Association's risk management process is based on three principle domains; the **person** using the service, the **staff** and the **premises/environment**. The organisation's overview combines information about significant risks that exist in the service, in particular those which pose a threat to the safety of people or the continuity and quality of the service. The format for identifying, assessing and managing these overall risks involves the use of an Organisation Risk Register. The reference to people includes people supported, families, staff, volunteers, contractors and community members. Similarly in relation to environments the Policy refers to all environments people are supported in, work in or undertake volunteering roles in.

The Organisation Risk Register

A Risk Register is a process used to monitor threats to the organisations ability to perform its functions effectively. The Organisation Risk Register includes those risks of a strategic nature which arise in the external policy, structural, regulatory and funding environment that have the potential to significantly impact organisational performance. The Risk Register also contains risks which are identified internally at a thematic level across the organisation such as recruitment and retention levels or training volumes and coverage levels, increased rates of dementia etc. Finally the Organisation Risk Register also contains those risks that are specific to a particular service and cannot be addressed within the capacities or resources of local services and staff teams. These risks then become escalated as per the Policy. Items placed on a Risk Register require action plans to address the risk. These actions are included in the Organisation Risk Register.

The strategic overview of risk is undertaken by the Leadership Team based on their oversight of the policy, structural, regulatory and financial landscape each year. They consider those risks which are currently known or are emerging as risks that could have potentially significant impacts on the organisation's performance. Risks are reviewed using the Standard Risk Matrix. If the risk is deemed to be sufficiently high it requires actions to reduce the level of risk.

These actions are specified in the Risk Register as Additional Measures. Responsibilities and timelines for these actions are assigned to individuals or identified functions. A similar process is undertaken in relation to risks which represent thematic issues across the organisation for example the need to address the process of formal Inquiries, the level of PRN Psychotropic Medication, Falls Prevention and Management etc.

When patterns can be identified in risks that are escalated by local services these may reflect themes beyond an individual service and may require organisation wide action. In other cases local service risks are very specific to that service and although they may be escalated to the Organisation Risk Register they are addressed in response to the particular presenting risk for that specific service.

Existing Measures to Reduce Risk

Services have a significant policy and procedural underpinning to prevent or mitigate adverse events as outlined in the Organisational Safety Statement. Those concerned directly with the people we support include the Individual Planning process, Personal Risk Management Plans, Safeguarding and Protection, Complaints, Safe Administration of Medication and the Missing Persons Policy. Policies related to staff include Dignity at Work, Employee Assistance Programme, Minimal Handling, Staff Development through Training and the Lone Workers Procedure.

Examples of environmental risk plans include the Hazard Identification process, Fire Safety, Emergency Plans and Adverse Weather Policy. There are also financial policies and procedures that safeguard the continuity of services, maintain staffing levels etc.

Many of these policies and procedures which provide direction and guidance in the management or avoidance of adverse events generate reports which provide data. This data informs organisation practice. The most prominent sources of data are the incident reporting and the budget reporting process. Other sources include complaints, fire drills, staff absence, turnover, training coverage etc. This data helps to determine if the organisation is effective in reducing adverse events. These can include frequent or serious incidents, loss of staff continuity through absence or turnover, overspent budgets, high rates of complaints, fire evacuation drills etc.

The extensive policy and procedural system is supported with a staff development programme which includes training in many of these areas such as Protection and Welfare/Safeguarding, Fire Safety, Minimal Handling, Managing Challenging Behaviour, First Aid, Medication Administration, Health Conditions such as epilepsy, diabetes etc. There is also a substantial volume of bespoke training events provided to address person or team specific requirements in areas such as complex behavioural or health needs, handling and movement challenges etc. Bespoke training may account for up to 30% of training events in any given year.

In addition to formal training there are supports available from MDT and organisational support services. These include Physiotherapy, Occupational Therapy, Psychology, Behaviour Support, Speech and Language Therapy, Human Resources, Health and Safety, Records Management, Finance, IT, Evaluation and Training. These functions can provide support and guidance in addressing emerging risks or reviewing existing risks. Often these functions are engaged in supporting the local service at various levels. However it is also open to a service to submit a referral or request assistance when this is appropriate.

In general staff demonstrate good practice in preventing and managing adverse events using their own knowledge of people and situations along with the direction and guidance of policies and procedure, associated training programmes and support from a range of MDT and organisational support functions. However on occasion issues may arise that pose a threat to the safety of people or the continuity of the service which cannot be addressed within the resources and capacities of the local service team or the regular MDT or organisational supports.

Examples could include a sudden increase in serious incidents or a rapid turnover of staff. A poor HIQA report may be sufficient to threaten the continued provision of part or all of the service.

Of course all of the above may be within the capacity of the local service to address. However when this is not the case and the nature of the threat is serious and persistent the issue needs to be escalated.

It should be standard practice that concerns arising are discussed at team level and between the FLM and the Senior/Regional Manager/Head of Department. In addition there is ongoing tracking of Basic Assurances data through processes such as incident monitoring, fire drill monitoring, budget monitoring, and attendance monitoring etc. which all provide reports on trends of concern to the FLM and Senior/Regional Service Manager/Head of Department.

In general the normal management and supervisory practice combined with indicators from a range of data sources as described above should ensure that serious risks are identified and addressed in the course of regular operation of the service.

However there does need to be a process in place to identify, assess and address risks in local services and teams/departments to ensure that the oversight and monitoring of risk is systematic and that risks are escalated when required. This is the function of the Risk Register process.

2. Developing the Local Service Risk Register

Risk Identification and Assessment at Local Service Level

Each Frontline Manager (FLM) or equivalent is required to undertake a process of identifying and assessing the nature of significant risks in their service or area of responsibility. The assessment process considers the people and the environment using the Risk Rating Tool to determine a risk score. They then use the Risk Matrix to determine the level of risk as High, Medium or Low.

Completing the Local Service Risk Register

The line manager completes the Local Service Risk Register which has four columns. These are;

1. The Categories of Risk
2. The Existing Measures in place
3. Additional Measures that have been agreed as part of the risk review process
4. Risk Escalation

The first column is divided into the 3 main Categories of Risk ; 1) The Person Using the Service, 2) The Staffing Arrangements and 3) The Premises and Environment.

In the second column 'Existing Measures in Place' the FLM indicates what actions are already in place to address the risk under each of the 3 main categories of risk.

This will usually be completed as follows:

1. The Person Using the Service – All PRMPS rated and scored
2. Staffing Arrangements – Agreed Staff Roster in place
3. The Premises – Hazard Identification Forms completed and scored

The third column contains the Additional Measures which have been put in place by the FLM and, if necessary, involving the agreement of the Senior/Regional Services Manager/Head of Department.

The fourth and final column 'Risk Escalation' identifies where a risk has been escalated by the FLM to the Senior/Regional Services Manager/Head of Department or by them in turn to the Executive Director.

Risk Rating

Each risk is scored using the Risk Rating Tool which estimates how likely (Likelihood Score) that harm will occur and if it does occur how severe will the impact be (Severity Score). The Risk Score is computed by multiplying the Likelihood Score by the Severity Score ($L \times S = R$). The score can be identified as High, Medium or Low on the Standard Risk Matrix which is a table showing how scores are graded (*see Appendix 1*).

Typically a risk score below 9, which is the absolute mid-point on the scale, is acceptable as a lower level risk. As the scores increase above 9 additional measures need to be considered to reduce the risk. Additional measures should be proportionate to the risk. For example a risk score of 10 is marginally above the acceptable level whereas a risk score of 25 represents the maximum level of risk. Therefore the level of urgency, detail and prioritisation for solutions should reflect the degree of risk.

Once the result of additional measures is factored in the risk is re-rated. This is called the Residual Risk Score. This means that when the proposed additional measures are taken it is predicted that the Risk Score will reduce to a specified level.

Risk Escalation

Many risks that arise can be addressed through additional measures taken by the line manager and local staff team. The line manager may also involve MDT and organisation support functions who are already involved with these particular issues in the service. At times problem solving for local service risks will require the active involvement of the Senior/Regional Service Manager/Head of Department. When the additional measures are specified the risk is rerated and the Residual Risk Score is calculated. This will indicate if the risk is acceptable or if it needs to be formally escalated by the local service to the next level of management.

There will also be some cases where the risk cannot be managed within the resources or capabilities of the local service. These then become the subject of a more formal escalation process to the Senior/Regional Services Manager/Head of Department. This could particularly be the case where resource requirements are significant or where a complex solution such as a service reconfiguration is required.

If it is not possible to reduce the risk to a satisfactory level following rerating of additional measures and the establishment of the Residual Risk Score the risk is escalated by the Senior/Regional Service Manager/Head of Department to the

Executive Director. This follows the same type of process that has been undertaken by the line manager and Senior/Regional Service Manager/Head of Department whereby some initial problem solving is explored first before formally escalating the risk. The Executive Director will escalate those local service risks that cannot be satisfactorily addressed to the Quality and Safety Committee of the Board of Directors.

Additional Considerations

While the risk scores represent a simple measure to draw attention to the estimated level of risk there are other considerations about what determines an acceptable level of risk. In the case of a person using services for example these considerations include the particular circumstances of the person and how important the activity is for them. Risk management is not risk avoidance. It is a problem solving process that ensures the relevant people are informed and engaged in solutions.

This process should not disempower the line manager or deter them from engaging in the problem solving process with their staff team and with the MDT and organisational support functions where these are involved. It should also not become a problem passing exercise at any level as it has the potential to become a defensive practice which results in avoidance and disengagement. The process cannot work without each party assuming their responsibilities in problem solving at each stage in the risk reduction/escalation process.

Addressing the Risk Categories on the Risk Register

Where direct services are provided risks are typically assessed in 3 broad categories;

1. The Person Using the Service
2. The Staffing Arrangements
3. The Premises and Environment

3. The Person Using the Service

Personal Risk Management Plan (PRMP) is used to identify the current significant risks and the measures currently in place to reduce/address the risks are also listed.

The stages in this process are as follows:

1. Describe the risk and possible resulting harm
2. Set out existing controls/measures that are in place as a response
3. Assess the likelihood and severity of harm occurring with these controls in place using the Risk Rating Tool
4. Assess whether this is sufficient
5. Decide whether additional controls are needed
6. Reassess the risk once additional controls are in place
7. Decide whether this issue should be escalated through the line management structure for resolution based on the level of continuing risk.

Update the Local Service Risk Register (Appendix 5) to summarise the key issues from the PRMP so that there is a clear and succinct description of risks, measures to address these and identification of further actions including escalating the risk.

The Senior/Regional Service Manager/Head of Department must receive and retain a copy of the Local Service Risk Register.

4. The Staffing Arrangements

There are a variety of risks that may arise in relation to staffing arrangements. Some may have already been identified through the review of risks for people using the service and issues of resources or training may have been considered as additional measures. Other staffing related risks include insufficient numbers of staff available to operate the service, high levels of absenteeism, high levels of turnover or unfilled vacancies. There may be indicators of poor staff morale such as ongoing complaints and inquiries, poor team work, disputes etc. There may be a poor match between the way resources are used and the assessed needs of the service. These risks need to be identified in the Staffing Arrangements Rating Form (Appendix 3).

Any existing measures to address each risk should be described. The risks should be assessed and scored using the Risk Rating Tool. The same process is then completed by the FLM to specify what additional measures should be taken to reduce risks that are identified as unacceptable. These additional measures should be within the resources and capabilities of the local services. The FLM should calculate the Residual Risk Score which predicts the level of risk if the additional measures were in place.

If the level of risk is still not considered satisfactory the FLM will follow up with the Senior/Regional Manager/Head of Department and agree what further measures may be taken to reduce the risk to an acceptable level. The additional measures are specified on the Local Service Risk Register Form under the heading **Requires Escalation**.

If this process cannot resolve the matter and the risk remains unacceptably high the Senior/Regional Manager/Head of Department will escalate the risk for the attention of the Executive Director noting this in the column **Requires Escalation** on the Local Service Risk Register Form.

The FLM keeps a copy of the completed Local Risk Register Form in their Local Service Risk Register Folder.

The Senior/Regional Service Manager/Head of Department also maintains a copy of the Local Service Risk Register.

5. The Premises and Environment

Review all of the risks related to the premises both internally and on the grounds. These will, by and large, already have been addressed in the Hazard Identification process which also involves the use of the Risk Rating Tool and the Risk Matrix and therefore fits into the Risk Register scoring process quite easily (*Appendix 4*).

In addition to the typical safety issues that can arise with the premises there can be other types of risks identified such as problems with the lease or tenancy or other risks that remain unacceptably high. These should also be listed on the Premises and Environment Risk Form. Existing measures to address the risk should be described.

The risk is then scored using the Risk Rating Tool in the same way as it has been done for People Using Services or Staffing Arrangements. If the Residual Risk score is still too high having considered additional measures which are within the resources and

capabilities of the local service then the matter is escalated to the attention of the Senior/Regional Services Manager/Head of Department.

A similar process is undergone with the Senior/Regional Services Manager/Head of Department in working to put additional measures in place to reduce the risk to an acceptable level. If there are resource issues or other types of measures which cannot be addressed at this level the matter is escalated to the Executive Director noting this in the column **Requires Escalation** on the Local Service Risk Register (*Appendix 5*).

The FLM keeps a copy of the completed Local Risk Register in their Local Service Risk Register Folder.

The Senior/Regional Service Manager/Head of Department also maintains a copy of the Local Service Risk Register.

6. Escalating Risks from Local Services to the Organisation Risk Register

Following a review of risks and additional measures for escalated risks the Executive Director will re-rate the risk. If it remains unacceptably high the risk will be included in the Organisation Risk Register.

The Quality and Safety Committee of the Board of Directors will be informed of any additions to the Risk Register and will receive reports to update them on the implementation of the action plan. The contents of the Risk Register and progress on action plans will be the subject of a 6 monthly report to the Board of Directors. The Board of Directors and the Quality and Safety Committee may seek to review the Organisation Risk Register at intervals determined appropriate by themselves.

7. Monitoring Implementation

When the action plan to address the concerns is implemented the risk will be re-rated using the standard matrix to determine if the risk has been reduced to an acceptable level. If the risk has been reduced to an acceptable level it will be removed from the organisational Risk Register.

The issue of initial concern will continue to be monitored at local service level and by the Senior line manager in consultation with the FLM. If there is a change in the status of the risk and it increases again to unacceptable levels the process of escalation to the Executive Director will recommence.

The Leadership Team will review and update the Risk Register at 6 monthly intervals. Each member assigned to manage a specific risk will update the Executive Director on an ongoing basis concerning the implementation of the action plan and the status of the risk.

The Quality and Safety Committee will review the Risk Register every 6 months and will determine what periodic updates are required to assure them that the identified risks are being addressed through the implementation of the action plan. The status of the Organisation Risk Register will be included in the 6 monthly reports by the Quality and Safety Committee to the Board of Directors.

Risk Rating Tool

The purpose of Risk Rating is to determine the level of significance of the risk.

Risks are rated by considering two key factors:

1. Likelihood; this refers to how likely it is that harm will occur.
2. Severity; how serious would the consequences be if harm occurs.

To determine the Risk Rating, you score likelihood and severity separately using the Scoring Guidance below:

LIKELIHOOD RATING									
Rare / Remote (Score 1)		Unlikely (Score 2)		Possible (Score 3)		Likely (Score 4)		Almost Certain (Score 5)	
Actual Frequency	Probability	Actual Frequency	Probability	Actual Frequency	Probability	Actual Frequency	Probability	Actual Frequency	Probability
Occurs every 5 years or more	1%	Occurs every 2-5 years	10%	Occurs every 1-2 years	50%	Bimonthly	75%	At least monthly	99%

SEVERITY RATING				
Negligible (Score 1)	Minor (Score 2)	Moderate (Score 3)	Major (Score 4)	Extreme (Score 5)
Adverse event leading to minor injury not requiring first aid.	Minor injury or illness, first aid treatment required <3 days absence < 3 days extended hospital stay.	Significant injury requiring medical treatment e.g. fracture Agency reportable, e.g. HSA, Gardai >3 Days absence 3-8 Days extended hospital stay.	Major injuries / long term incapacity or disability (loss of limb) requiring medical treatment	Incident leading to death or major permanent incapacity. Event which impacts on large number of people including members of the public.

Take your scores and multiply the Likelihood by Severity score to get the Risk Rating score. Now check the table below to see if the Risk Rating score falls into the High, Medium or Low category of Risk Rating. The nature of actions required to address different categories of risk; High, Medium, Low, are specified.

Control measures are defined as those measures which are required to reduce the risk.

Example:

- Likelihood Score = 4, Severity Score = 4
- Risk Rating – Likelihood x Severity Score, 4 x 4 = 16
- Risk Category = High
- Action - *Immediate action required. Activity should be stopped until control measures can be implemented to reduce risk to medium rating.*

RISK MATRIX					
	Negligible (Score 1)	Minor (Score 2)	Moderate (Score 3)	Major (Score 4)	Extreme (Score 5)
Almost Certain (Score 5)	5	10	15	20	25
Likely (Score 4)	4	8	12	16	20
Possible (Score 3)	3	6	9	12	15
Unlikely (Score 2)	2	4	6	8	10
Rare / Remote (Score 1)	1	2	3	4	5

RISK RATING	Descriptive Risk Rating	ACTION
15 – 25	High	Immediate action required. Activity should be stopped until control measures can be implemented to reduce risk to medium rating
6 – 12	Medium	Activity can proceed, but with caution, and ensuring control measures are maintained. Efforts should be made to reduce risk rating to low
Less than 5	Low	Activity can proceed. Control measures must be monitored and reviewed as required to ensure they remain suitable and sufficient.

You must rate the risks you have identified as part of the process of developing your Local Service Risk Register.

**Risk Rating Form for the Person Using the Service
PERSONAL RISK MANAGEMENT PLAN (PRMP)**

Personal Risk Rating Score For: _____ **Relevant Diagnosis:** _____

Date Completed: _____ **Form Completed By:** _____

List the locations where this risk occurs – home, community, day service etc.	Describe the risk/vulnerability for the person and state what harm can happen to the person or others	Describe the Existing Measures you have in Place to Manage the Risk	Risk Score (L X S=R)	Is this Satisfactory	Describe any additional measures you require to put in place to reduce the risk	Re-rated Risk Score (L X S=R)	Risk Escalation; If the risk is not reduced to a satisfactory level then forward this to the Executive Director through your line manager

PERSONAL RISK MANAGEMENT PLAN AGREEMENT

Date Completed: _____

Next Review Date: _____

Signed By: _____
All Present _____

Person Using Supports / Services-----

Family/Advocates/Representatives _____

Person Leading the Risk

Management Process:

(e.g. Usually the Frontline Manager with the support of other staff involved) _____

Read By:

(To be signed by all staff who support this individual)

Staffing Arrangements Risk Rating Form

Name of Service _____ Date Completed: _____ Form Completed By: _____

Risk Description <i>As a result of xxxx (cause) xxxx may happen (uncertain event) leading to xxxx effect</i>	Describe the Existing Measures you have in Place to Manage the Risk	Risk Scor e (L X S=R)	Is this Satisfactory	Describe any additional measures you require to put in place to reduce the risk	Re- rated Risk Score (L X S=R)	Requires Escalation by 1)FLM to Senior/Regional Service Manager/Head of Dept., or 2) by the Line manager to Executive Director

Premises and Environment Risk Rating Form

Name of Service: _____ **Date Completed:** _____ **Form Completed By:** _____

Risk Description <i>As a result of xxxx (cause) xxxx may happen (uncertain event) leading to xxxx effect</i>	Describe the Existing Measures you have in Place to Manage the Risk	Risk Score (L X S=R)	Is this Satisfactory	Describe any additional measures you require to put in place to reduce the risk	Re-rated Risk Score (L X S=R)	Requires Escalation by 1)FLM to Senior/Regional Service Manager/Head of Dept., or 2) by the Line manager to Executive Director

Local Service Risk Register

Name of Service: _____ Date: _____ Form Completed By: _____

Risk Categories	Addressed within the Service through existing or Additional Measures	Additional Measures Agreed by FLM with Senior/Regional Services Manager/Head of Department including Formal Escalation of the Risk	Escalated by Senior/Regional Services Manager/Head of Department to Executive Director
Meeting the Needs of People Using the Service	•		
Staffing Arrangements	•		
Premises and Environment	•		