

# Risk Management Policy and Procedures September 2022

# **Document Profile**

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Author	Claire White				
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Version control / changes made

Date	Version	Summary of changes made	Author
August New policy		C. White	
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#### 1. INTRODUCTION

#### 1.1 Rationale

Family Nursing & Home Care (FNHC) is committed to providing safe, high quality care and services which are supported by systems and processes which promote continuous improvement, learning and assurance. Risk will always be present in organisational activities so it is important to ensure that risk is understood, recognised, reported, reviewed and managed to support the overall aims of the organisation.

Risk management is applicable at all levels; Board, service/department, team and individual and is approached proactively to:

- Identify the various activities of the organisation;
- Identify the hazards that exist within those activities and the risks associated with those hazards;
- Asses those risks for likelihood and potential severity;
- Eliminate risks where possible
- Reduce the effect of those risks that cannot be eliminated;
- Acknowledge risks that can be tolerated;
- Seek to engage with stakeholders to understand risks and explain tolerated risks.
- Regularly monitor and review all risks.

#### 1.2 Scope

This policy applies to all FNHC employees, (including, volunteers, students and staff who are seconded or co-located to work for FNHC) and Board Trustees.

#### 1.3 Role and Responsibilities

#### **Board of Trustees**

The Board has overarching responsibility for risk and are accountable for ensuring that there are systems and resources to manage risk effectively. The Board will review 15+ Risks at least twice per year.

#### **Governance Sub-Committee**

The Governance Sub-Committee is responsible for reviewing 12+ risks at quarterly meetings to provide assurance that risks are being appropriately scored and effectively managed.

#### Chief Executive Officer

The Chief Executive Officer provides leadership and strategic direction to risk management and is accountable for ensuring that risk is being managed effectively across the organisation and escalated appropriately internally and externally where appropriate. The Chief Executive Officer is responsible for chairing quarterly Risk and Performance Meetings where 12+ risks from all services and departments will be reviewed to ensure appropriate scoring and effective management of risk. The Chief Executive Officer is responsible for overseeing and supporting Department Managers (who are direct reports) to maintain and review their risk registers during monthly 1:1 meetings.

#### **Director of Finance**

The Director of Finance is accountable to the Board and Chief Executive Officer for FNHC's financial management risk activities. The Finance Director is responsible for ensuring that FNHC carries out its business within sound financial governance arrangements that are controlled and monitored through robust audit and accounting mechanisms that are open to public scrutiny on an annual basis. The Director of Finance is responsible for overseeing and supporting Department Managers (who are direct reports) to maintain and review their risk registers during monthly 1:1 meetings.

#### **Director of Governance and Care**

The Director of Governance and Care is accountable to the Board and to the Chief Executive Officer for coordinating and supporting the management of clinical and non-clinical risk. The Director of Governance and Care is responsible for ensuring that FNHC carries out its business through sound governance arrangements that are controlled and monitored. The Director of Governance and Care is responsible for overseeing and supporting Operational Leads and Department Managers (who are direct reports) to maintain and review their risk registers during monthly 1:1 meetings.

#### **Operational Leads/Department Managers**

Operational Leads/Department Managers are responsible for ensuring that they and their teams are fully aware of risk management processes and that procedures are fully implemented. Operational Leads/Department Managers are responsible for assessing risk, maintaining and reviewing their Risk Registers on a monthly basis and escalating risk appropriately.

#### **Employees/Volunteers**

All employees and volunteers have a responsibility to:

- Ensure they work in accordance with all FNHC policies and procedures
- Remain up to date with mandatory and statutory training
- Report incidents, accidents and near misses in a timely manner

- Identify risks they feel exist within their department or service and escalate appropriately.
- Highlight identified risks to their manager where they are unable to manage the risk as part of their role responsibilities.

#### 2. POLICY

The policy should be read in conjunction with the following procedures: Incident Reporting and Learning Events Investigation. By providing a supportive risk management framework, FNHC will be enabled to develop and adopt a risk appetite, the benefits of which include:

- Supporting informed decision-making
- Reducing uncertainty
- Improving consistency across governance mechanisms and decision-making;
- Supporting performance improvement
- Focusing on priority areas within an organisation
- Informing spending review and resource prioritisation processes

It is expected that the policy will:

- Support the integration of risk management into activities across the organisation as well as policy making, planning and decision making processes.
- Help to minimise the impact of adverse incidents, risks and complaints by effective risk identification, prioritisation mitigation and management.
- Provide assurance to the Board of Trustees that strategic and operational risks are being managed.
- Develop risk management as an integral part of FNHC culture and encourage learning.
- Help to minimise risks associated with patient safety, health, safety & wellbeing of staff, service delivery and information security.
- Ensure clients are safeguarded using due process with escalation for cases and incidents which hold safeguarding risk as required.
- Help to improve outcomes for patients, clients and children
- Help to protect reputation, finances and business continuity through the process of risk identification, assessment, control and mitigation.

#### 3. PROCEDURE

FNHC uses Assure which hosts an electronic risk management system for assessing, monitoring, review and reporting of organisational risks.

#### 3.1 Risk Categorisation

Risks come in many forms. FNHC uses the following categories of risk which are listed on Assure:

- Clinical
- Health and Safety
- Premises
- Financial
- Information
- Reputation
- Legal
- Political
- Safeguarding

#### 3.2 Risk Scoring

Each risk identified will be examined for its initial (gross) level of risk. That is assuming the absence of any controls.

The risk will then be re-evaluated for its residual (net) level of risk using the same factors but taking into account controls and mitigations already in place which affect the likelihood and impact. The net score (referred to as 'Final' on Assure) will be used for reporting and discussing risk.

The consequence and likelihood of risk occurrence will be assessed against the FNHC risk scoring matrix (Appendix 2). This matrix is based on best practice and supported by the National Patient Safety Agency. Risks will be recorded, reviewed, monitored and reported from the Assure Risk Module. Appendix 3 contains a guide to support consequence scoring.

#### 3.3 Risk Escalation

Where there is an immediate risk to the health and wellbeing of patients/clients/ employees/others, this must be escalated immediately. If outside of normal working hours, the risk must be reported to the on-call manager for assistance

Risk Score	Escalation and management
1-3 Low risk	Risk should be managed at team/service level where appropriate. No escalation required.
4-6 Moderate Risk	Risk should be managed by Operational Lead/Department Manager. Discussed and reviewed at monthly 1:1 meetings with Line Manager.
8-12 High Risk	Risk should be managed by Operational Lead/Service Manager. Director of Governance and Care to review upon notification of risk entered onto Assure. Consider further escalation.
15+ Extreme Risk	Risk should be escalated immediately to Director of Governance and Care for management and further escalation to the Chief Executive Officer and Board.

#### 3.4 Accountability for Risk/Risk Escalation

Upon identification of risk, Operational Leads and Department Managers will complete a risk assessment on Assure.

Some risks will affect the whole organisation, the risk assessor will be responsible for managing and reviewing the risk on Assure. However, where appropriate, may action others to take measures to control/mitigate the risk.

Where a risk has a different impact upon different services/departments then a separate risk assessment should be carried out specific to the service/department under its Organisational Unit.

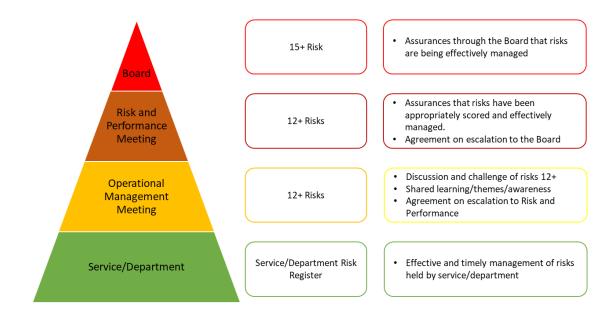
Assessors are responsible for reviewing their risks on a monthly basis.

Risks that score 12+ should be discussed at monthly Operational Managers Meetings, for challenge, to agree scoring, share learning, ensure effective management and agree escalation.

Risks that score 12+ will be discussed and reviewed at quarterly Risk and Performance meetings to ensure effective management and escalation to the Board will be agreed where necessary.

The Governance Sub-Committee will review risks 12+ at quarterly meetings to be assured of effective management of risk.

The Board will review risks 12+ at least twice per year, or as necessary and will be made aware of any 15+ risks so that these may be reviewed, scored and managed effectively in a timely manner.



#### 3.5 Tolerable Risk

It is recognised that it is not possible to eliminate all risks, either because of the high costs of elimination in comparison to the potential severity of the risk, other priorities or external factors.

When all reasonable control measure have been put in place some residual risk might remain and this level of risk can be accepted if the risk:

- is minor in nature, with minimal potential for financial loss or damage to structure, persons, equipment or property; or
- will occur rarely and might cause serious harm, damage or loss but which would take disproportionate resources to eliminate or reduce

Where risks are deemed 'tolerable' with no further action to be taken, they should still be reviewed in case circumstances have changed. The frequency of review will depend upon the level of risk. The minimum review frequency for accepted risks is set out below:

Risk Score	Level of Risk	Review Frequency
1-3	Low risk	Yearly
4-6	Moderate risk	Yearly
8-12	High risk	Quarterly
15+	Extreme risk	Monthly

All risks that score 15 or above can only be deemed 'tolerable' by the Board. All risks which score 15 or above must be reviewed at least monthly, irrespective of whether they are deemed 'tolerable'.

Where risks have been eliminated, the risk assessment will be updated and archived.

#### 3.6 Risk Assessment on Assure

Training will be provided to Operational Leads and Department Managers on the use of the Assure Activity Risk Assessment. Appendix 4 contains instructions on using the Activity Risk Assessment tool on Assure.

#### 3.7 Confidentiality

Where risks concern specific patients/clients/employees and contain confidential information they must not be added to the Assure risk management system in order to avoid breaching confidentiality. Such risk assessments must be stored in the patient / client's health record, or employee personnel folder as per organisational policy and procedures.

#### 4. CONSULTATION PROCESS

Identify who has been involved and when including service users and partner agencies

Name	Title	Date
Rosemarie Finely	Chief Executive Officer	10/08/22
Elaine Walsh	Director of Finance	10/08/22
Tia Hall	Operational Lead - Adults	10/08/22
Clare Stewart	Operational Lead – Out of Hospital	10/08/22
Teri O'Connor	Home Care Registered Manager	10/08/22
Jenny Querns	Safeguarding Lead	10/08/22
Michelle Cumming	Operational Lead – Child and Gamily	10/08/22
Justine Le Bon Bell	Education and Development Lead	10/08/22
Elspeth Snowie	Clinical Effectiveness Facilitator	10/08/22
Claire Whelan	Head of Information Governance and Systems	10/08/22
Michael Gardner	Head of Finance	10/08/22
Amanda de Freitas	Head of Human Resources	10/08/22

#### 5. IMPLEMENTATION PLAN

Action	Responsible Person	Planned timeline
Upload policy and questions to Virtual College and send link to all staff	Education and Development Department	September 2022
Send all user email	Secretary/Administration Assistant (Quality and Governance Team)	Within 2 weeks following ratification
Place on the Procedural Document Library	Secretary/Administration Assistant (Quality and Governance Team)	Within 2 weeks following ratification

#### 6. MONITORING COMPLIANCE

Risks will be monitored on a monthly basis as part of the procedures.

#### 7. EQUALITY IMPACT STATEMENT

Family Nursing & Home Care is committed to ensuring that, as far as is reasonably practicable, the way services are provided to the public and the way staff are treated reflects their individual needs and does not discriminate against individuals or groups on any grounds.

This policy document forms part of a commitment to create a positive culture of respect for all individuals including staff, patients, their families and carers as well as community partners. The intention is to identify, remove or minimise discriminatory practice in the areas of race, disability, gender, sexual orientation, age and 'religion, belief, faith and spirituality' as well as to promote positive practice and value the diversity of all individuals and communities.

The Family Nursing & Home Care values underpin everything done in the name of the organisation. They are manifest in the behaviours employees display. The organisation is committed to promoting a culture founded on these values.

#### Always:

- ✓ Putting patients first
- ✓ Keeping people safe
- ✓ Have courage and commitment to do the right thing
- ✓ Be accountable, take responsibility and own your actions

- ✓ Listen actively
- ✓ Check for understanding when you communicate
- ✓ Be respectful and treat people with dignity
- ✓ Work as a team.

This policy should be read and implemented with the Organisational Values in mind at all times.

#### 8. GLOSSARY OF TERMS

#### Hazard

A hazard is something that can cause harm

#### Risk

Risk is the chance that a hazard will cause harm

#### **Risk Matrix**

A risk matrix is used to evaluate risk – plotting the likelihood of harm occurring from an identified hazard against the severity of the impact should it occur.

#### **Tolerable Risk**

Tolerable risks are those that people are prepared to live with, where the risk has been controlled as far as reasonably possible and the residual risk is minimised.

#### 9. REFERENCES

Ripley, M. (2021) *Risk Appetite Guidance Note*, Available from: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment</a> data/file/1012891/20210805 - Risk Appetite Guidance Note v2.0.pdf

NHS England, (2021) *An operational risk management strategy for trusts*, Available from: <a href="https://www.england.nhs.uk/publication/an-operational-risk-management-strategy-for-trusts/">https://www.england.nhs.uk/publication/an-operational-risk-management-strategy-for-trusts/</a>

Health and Safety Executive, (2022) managing risks and risk assessment at work, Available from: https://www.hse.gov.uk/simple-health-safety/risk/index.htm

# 10.1 Appendix 1 Equality Impact Screening Tool

Stage 1 - Screening						
Title of Procedural Docu	ıment: Policy					
Date of Assessment 10/08/22 Responsible Governance Department						
Name of person completing assessment  C. White Job Title Head of Governance, Quality and Care						
Does the policy/function affect one group less or more favourably than another on the						

# Does the policy/function affect one group less or more favourably than another on the basis of :

	Yes/No	Comments
• Age	No	
Disability Learning disability; physical disability; sensory	No	
impairment and/or mental health problems e.g. dementia		
Ethnic Origin (including hard to reach groups)	No	
Gender reassignment	No	
Pregnancy or Maternity	No	
Race	No	
• Sex	No	
Religion and Belief	No	
Sexual Orientation	No	
If the answer to all of the above questions is NO, the EIA is complete. If YES, a full impact assessment is required: go on to stage 2, page 2		

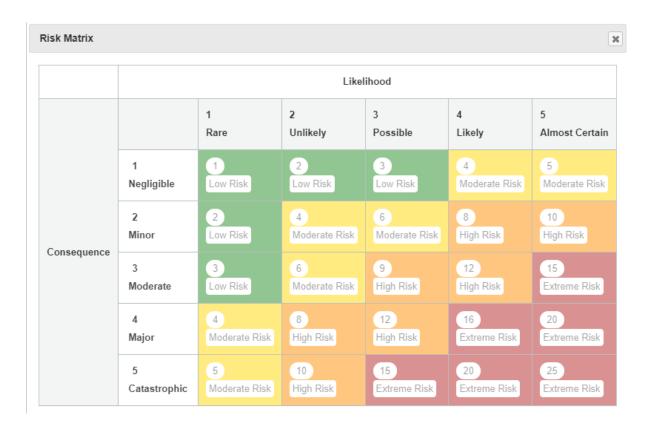
# Stage 2 – Full Impact Assessment

What is the impact Level of Impact		Mitigating Actions (what needs to be done to minimise / remove the impact)	Responsible Officer

# **Monitoring of Actions**

The monitoring of actions to mitigate any impact will be undertaken at the appropriate level.

# 10.2 Appendix 2 Risk Matrix



# 10.3 Appendix 3 Consequence Score

Use the table below to determine the risk consequence. Choose the most appropriate domain from the left hand side of the table then work along the columns in the same row to assess the consequence.

	Consequence score and examples of descriptors					
	1	2	3	4	5	
Domains	Negligible	Minor	Moderate	Major	Catastrophic	
Patient and staff safety	Minimal injury requiring no / minimal intervention or treatment.	Minor injury or illness, requiring minor intervention  Requiring time off work for >3 days	Moderate injury requiring professional intervention  Requiring time off work for 4-14 days.  RIDDOR reportable incident	Major injury leading to long-term incapacity / disability  Requiring time off work for >14 days	Incident leading to death  Multiple permanent injuries or irreversible health effects	
	No time off work		An event which impacts on a small number of patients	Mismanagement of patient care with long-term effects	An event which impacts on a large number of patients	
Quality	Peripheral element of treatment or service suboptimal Informal complaint/ inquiry	Overall treatment or service suboptimal  Formal complaint Local resolution  Single failure to meet internal standards  Minor implications for patient safety if unresolved	Treatment or service has significantly reduced effectiveness  Local resolution (with potential to go to independent review)  Repeated failure to meet internal standards	Non-compliance with national standards with significant risk to patients if unresolved  Multiple complaints / independent review	Unacceptable level or quality of treatment / service  Gross failure of patient safety if findings not acted on  Inquest / ombudsman inquiry	
		Reduced performance rating if unresolved	Major patient safety implications if findings are not acted on	Low performance rating  Critical report	Gross failure to meet national standards	

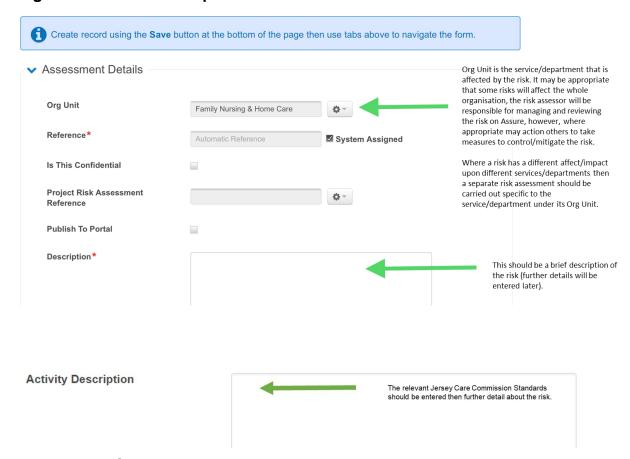
Human Resources / Organisational Development	Short-term low staffing level that temporarily reduces service quality (< 1 day)	Low staffing level that reduces the service quality	Late delivery of key objective/ service due to lack of staff  Unsafe staffing level or competence (>1 day)  Low staff morale  Poor staff attendance for mandatory/key training	Uncertain delivery of key objective/service due to lack of staff  Unsafe staffing level or competence (>5 days)  Loss of key staff  Very low staff morale  No staff attending mandatory/ key training	Non-delivery of key objective/service due to lack of staff  Ongoing unsafe staffing levels or competence  Loss of several key staff  No staff attending mandatory training /key training on an ongoing basis
	Consequence score (incident severity) and examples of descriptors				
	1	2	3	4	5
Domains	Negligible	Minor	Moderate	Major	Catastrophic
Statutory duty / inspections	No or minimal impact or breech of guidance/ statutory duty	Breech of statutory legislation  Reduced performance rating if unresolved	Single breech in statutory duty  Challenging external recommendations / improvement notice	Enforcement action  Multiple breeches in statutory duty  Improvement notices  Low performance rating  Critical report	Multiple breeches in statutory duty  Prosecution  Complete systems change required  Zero performance rating  Severely critical report
Adverse publicity / Reputation	Rumours Potential for public concern	Local media coverage – short-term reduction in public confidence Elements of public expectation not being met	Local media coverage – long-term reduction in public confidence	National media coverage with <3 days service well below reasonable public expectation	National media coverage with >3 days service well below reasonable public expectation. MP concerned (questions in the House)  Total loss of public confidence

Business Objectives	Insignificant cost increase / schedule slippage	<5 per cent over project budget  Schedule slippage	5–10 per cent over project budget  Schedule slippage	Non-compliance with national 10–25 per cent over project budget Schedule slippage Key objectives not met	Incident leading >25 per cent over project budget Schedule slippage Key objectives not met
Finance	Small loss Risk of claim remote	Loss of 0.1–0.25 per cent of budget  Claim less than £10,000	Loss of 0.25–0.5 per cent of budget  Claim(s) between £10,000 and £100,000	Uncertain delivery of key objective/Loss of 0.5–1.0 per cent of budget  Claim(s) between £100,000 and £1 million  Purchasers failing to pay on time	Non-delivery of key objective/ Loss of >1 per cent of budget  Failure to meet specification/ slippage  Loss of contract / payment by results  Claim(s) >£1 million
Service / business interruption Impact on environment	Loss/interruption of >1 hour  Minimal or no impact on the environment	Loss/interruption of >8 hours Minor impact on environment	Loss/interruption of >1 day  Moderate impact on environment	Loss/interruption of >1 week  Major impact on environment	Permanent loss of service or facility  Extreme impact on environment

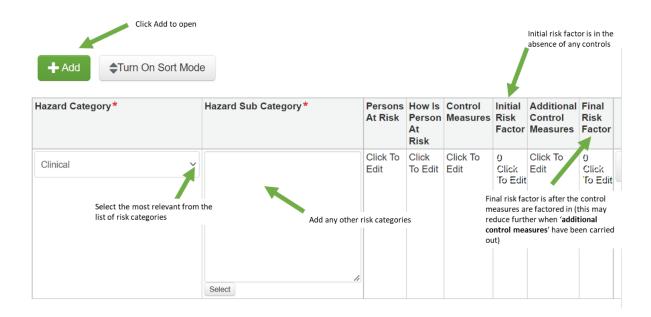
#### 10.4 Appendix 4 'How to Guide' - Assure Risk Assessment

The following sets out how to complete a risk assessment using Assure, most of the sections are self-explanatory, however the following notes will provide support:

#### **Org Unit and Risk Description:**



#### **Hazards and Control Measures:**



#### **Tolerable Risk:**



Where risks are deemed 'tolerable' with no further action to be taken, they should still be reviewed in case circumstances have changed. The frequency of review will depend upon the level of risk. The minimum review frequency for accepted risks is set out below:

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8-12	High risk	Quarterly
15+	Extreme risk	Monthly

#### **Record Review:**

