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# Following Policy and Procedure: An RHRA Inspector's Perspective

Webinar

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# Introduction

- Two common examples of non-compliance:
  - Failure to follow policy for zero tolerance of abuse/neglect
  - Failure to follow procedure for complaints to licensee
- What leads to these findings?
- Today we will discuss:
  - What inspectors look for on an inspection related to an allegation of abuse/neglect or the home's handling of a complaint
  - Common pitfalls and some tips and suggestions

# Inspection Overview

- Inspector will explain the reason for the inspection upon entry
- This is an information gathering exercise
  - The nature of the allegation dictates what the Inspector will request and review
- Inspector may:
  - Request multiple documents
  - Speak to management, staff, residents, and family
- As with any inspection, an exit debrief will be conducted or arranged

# The Starting Point

- Inspectors will want to see:
  - Zero tolerance of abuse and neglect policy/complaints procedure
  - Records of investigation of the allegation/complaint
  - Resident files, including:
    - Resident Agreement & information package
    - Assessments, plan of care, progress notes etc.
  - Evidence of notification/follow-up with the resident and their family or SDM, or the complainant
  - Record of analysis, results, changes made

# Digging Deeper

- Other common requests include:
  - Policies, strategies, programs and records that relate to the allegation, for example:
    - Behaviour management strategies
    - Dementia care program
    - Medication administration records
    - Falls strategies and documentation
    - Complaint records
  - Staff training records
  - Staff files
- Inspectors will also speak with individuals who may have information relevant to the inspection

# Scenario

- Allegation of abuse
- Licensee's policy requires home to:
  - Immediately start conducting an investigation
  - Separate staff member from residents
  - Assess the resident and put resident supports in place
  - Immediately notify the resident's SDM
  - Immediately contact police if it is suspected the incident constitutes a criminal offence
  - Complete an investigative report using form 'A'
  - Record statements on form 'B'
  - Conduct an analysis of the incident

# Drawing Conclusions

- Inspectors look at the evidence gathered and determine whether:
  - The home's tailored policy or procedure was followed
  - The requirements of the Act and the Regulation were met

# Common Pitfalls

- Not recognizing cases of abuse or neglect
- Not realizing that a complaint is being made
- Not referring to the home's policy or procedure
- Policies or procedures with steps or forms that are never used
- Inadequate documentation



# Tips and Suggestions

- Streamline and simplify
- Invest in staff training; make responsibilities clear
- Implement policies and procedures that will be useful to staff as working tools
- Document through to closure of the file and remember to include dates
- Remember - one incident or complaint can trigger multiple requirements and policies/procedures

# Bonus Tips: Complaints

- Know how to recognize a complaint and what steps to take
- Take all complaints seriously
- Always follow up with the complainant
- Take advantage of the written record of complaints
- Stay alert to allegations of abuse or neglect

# Questions?

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