Business Continuity and Disaster Recovery Plans

- ### Emergency Management Plan

POLICY

Lifemark Health is committed to creating a safe and healthy environment. The health and safety of our employees, clients and the public are the highest priority of the Lifemark Health Emergency Management Plan. The Lifemark Health Emergency Management Plan will comply with all applicable legislation and regulations and will allow for the continuation of business and the return to normal function as soon as possible after an emergency. Our emergency response priorities are:

- Safety of the Lifemark Health community and the public.
- Environmental protection.
- Asset protection.
- Restoration of Lifemark Health essential services.
- Restoration of Lifemark Health business operations

All Lifemark Health employees, and contracted workers are required to be familiar with the Emergency Response protocols and will actively participate in training, exercises, planning and activation of the Lifemark Health Emergency Management Plan.

PURPOSE

The purpose of the Emergency Management Plan is to establish uniform procedures, strategies, and a concept of operations for a planned, coordinated, effective response to all natural and human-caused emergencies in order to protect human health, property, and the environment during an imminent or actual emergency in or affecting the Lifemark Health operation.

SCOPE & APPLICATION

This policy and the related plan and procedures apply to emergencies that occur on the Lifemark Health facility property. Service delivery outside Lifemark Health facility property will follow local emergency procedures.

DEFINTIONS

For the purpose of this policy and the Emergency Management Plan:

- **Emergency** is an urgent and/or critical situation that threatens or causes harm to people, the environment, and Lifemark Health property and/or disrupts critical operations.
- **Emergency Management** is the universal term for the systems and processes for mitigating, preparing for, responding to and recovering from emergencies and disasters.
- **Emergency Services Personnel** are municipal services that are necessary to enable Lifemark to prevent dangers to life, the destruction or serious deterioration of machinery, equipment or premises, as well as serious environmental damage.

ORGANIZATIONAL STRUCTURE & RESPONSBILITIES

Lifemark Health's Emergency Management Plan is designed to manage all emergency response activities on Lifemark Health facility property. This structure will be mobilized to the extent necessary to effectively deal with the situation. It is composed of the following major elements:

I. EMERGENCY RESPONSE LEVELS

Level 1 (Day to Day Emergency): A situation exists that represents a danger to the Lifemark Health facility; however, it can be handled by the designated **"Site Lead"** and first response from fire, police and/or ambulance. The expected duration of the emergency response phase is **less than 12 hours**.

Level 2 (Major Emergency): A serious emergency exists that represents a danger to the Lifemark Health facility that poses an immediate threat to employees, clients, visitors, or the public that cannot be satisfied by evacuating the building (e.g. major fire, dangerous weather, etc.). The expected duration of the emergency response phase is **between 12 to 24 hours** and it is beyond the capabilities of the **"Site Lead"**. This level of activation may require partial or full support and coordination from Regional /Business as per the Business Continuity Plan.

Level 3 (Disaster): A crisis situation exists that seriously affects the Lifemark Health facility's safety, the environment, or operations and may be a direct and immediate threat to employees, clients, visitors, or the public. It requires a significant response from the municipal jurisdictions emergency response agencies and is expected to have **more than 24- hour duration** for emergency response. This level requires full activation of the Business Continuity Plan and the Crisis Management Team.

II. RESPONSE GROUPS & RESPONSIBILITIES

- **Site Lead /Facility Management (FT) -** Facility Management is the first level of decision-making within Lifemark Health's Emergency Management Plan and is responsible for all first line activities related to an emergency on Lifemark Health property. They co-ordinate activities of all Lifemark Health resources present at the scene of an emergency. Lifemark Health will also coordinate with municipal emergency services personnel and additional emergency resources as required.

- **Business Continuity Plan (BCP) Team is** the primary resource for supporting the Site Lead/Facility Management in an emergency They include:
  - · Executive Team
  - · BCP Lead
  - · Business Lead and/or Regional Lead
  - · Site Lead

· Site Team
· Corporate Support
· Additional members as required

Responsibilities:
· Please review the Business Continuity Plan for key responsibilities

EMERGENCY COMMUNICATIONS

- **Internal Communications -** Communication in an emergency situation may come to the Lifemark Health location through a variety of resources.

  - **Web Sites:** Emergency information on the Lifemark Health website or intranet
  - **Email:** Security Alerts on e-mail to all Lifemark Health employees with a Lifemarkhealth.ca address and all other list subscribers.
  - **Local TV and radio networks**
  - **Health & Safety Bulletin Boards**
  - **Twitter**

  Senior Management is responsible for all aspects of media relations and internal communications during an emergency. They will employ strategic communications to inform the Lifemark Health community of any danger to safety of individuals and to maintain the image and reputation of Lifemark Health.

- **External Communications -** All media inquiries should be forwarded to Executive Team. Management. They will identify the Lifemark Health spokesperson, answer media inquiries, write news releases, and organize news conferences and the media center, where applicable. **Employees who have not received media training and are not designated spokespersons** must politely decline to respond to media inquiries while at the same time offering to arrange for a representative of Lifemark Health to contact the media representative.

GENERAL PREPAREDNESS – FACILITY MANAGEMENT

- Facility management shall obtain and ensure that the Onsite BCP Resource Binder and all employee Personal Emergency Contacts are obtained on a regular basis. Employee Personal Emergency Information includes:
  - Emergency Contacts (Names and Contact Information)
  - Medical Information if required (complete the details)

  This information should be kept up to date and a copy safely secured at the Facility

  Director/Managers personal residence in case of a facility closure, etc.

- Ensure that all employees are aware of the facility emergency evacuation and accountability plan (EEAP) and relevant emergency response procedures in place at the facility on a regular basis.

- Facility Management will ensure the completion of actual and/or simulated emergency response procedural drills annually for:

    - Fire Evacuation Emergency
    - Bomb Threat Evacuation Emergency
    - Natural Disaster Emergency
    - Utility/Power Outage Emergency
    - Medical Emergency
    - Violent Situation Emergency

Evacuations

If a Lifemark Health fire alarm is sounded, all occupants of a building are expected to evacuate the building immediately. This is both for the safety of the occupants as well as the first responders as it ensures that first responders will not have to re-enter the building to search for individuals who have not evacuated. All employees and are expected to know their facility Assembly Points and alternate Assembly Points for evacuating from the buildings in which they work.

Lockdown

A lockdown is an emergency procedure intended to secure and protect occupants when there is an immediate threat on Lifemark Health property such as an armed intruder. This procedure is used when it may be more dangerous to evacuate a building than to stay inside.

Facility Closure

Employees - If a Lifemark Health facility closure has been announced, employees are expected to:

- Report to their supervisors/managers prior to leaving the facility.
- Remain off- Lifemark Health facility property with the exception of those employees identified.
- Keep in contact with their supervisors/managers by phone or email and/or Lifemark Health through the Main TOUCH Home Page to determine the state of alert on Lifemark Health facility property and establish when they are to return.
- Once a re-opening of the Lifemark Health facility has been announced, employees are expected to:
    - Report to work on the identified day, unless they have been advised otherwise by their supervisor/manager
    - If they are unable to report they are to contact their supervisor/manager to indicate the reason.

GENERAL PREPAREDNESS FOR EMPLOYEES

- Ensures familiarity with and follows Lifemark Health Emergency Response Procedures, as well as, any specific onsite Emergency Response Procedures.
- Attend and complete available education and training programs.
- Ensures that personal contact information is current and accurate.

Business Continuity and Disaster Recovery Plans
- **Business Continuity Plan**

POLICY

Lifemark Health is committed to providing a safe and secure environment. As part of an overall risk, management strategy Lifemark Health maintains a comprehensive Business Continuity Plan. The plan is based on a formal risk analysis, which determines the essential services, and critical business functions that must be maintained during any disruption of normal operations building organizational resilience.

All Lifemark Health sites have a comprehensive and coordinated set of recovery plans, procedures and resources to respond to emergencies, disasters, incidents (emergency response plans), and both planned and unplanned outages of information technology services and applications.

All Lifemark Health sites/locations ensure that procedures are in place for carrying out the site specific BC plan and ensure that:
- Multiple copies of BC plans are securely stored in locations distant enough so as to not be in danger if a disaster occurs at the particular facility.
- BC plans are protected to maintain the security of organization-specific details.
- BC plans are reviewed and updated quarterly or as required to ensure that they are timely and effective.

All Lifemark Health employees, physicians and contracted workers are required to be familiar with the Emergency Response Protocols, site specific Business Continuity Plans, and actively participate in training, testing exercises, planning and activation of the Lifemark Health Business Continuity Plan.

PURPOSE

The purpose of this policy is to ensure a system-wide, coordinated approach to Business Continuity, Emergency Preparedness and pandemic planning to:
- ensure a common approach for responding to, managing and recovery from emergencies, disasters, incidents;
- ensure the safety and security of all staff, patients/clients and visitors in an emergencies, disasters, incidents; and
- enable all staff to respond effectively in emergencies, disasters, incidents.

RATIONAL

Lifemark Health Group recognizes the requirement for effective response to both internal and external situations that may impede the organization's ability to provide normal levels of service. Subsequently, Lifemark Group will ensure the best possible service will be provided during a business impairment, emergency or disaster by supporting the development, evaluation and maintenance of an organization wide Emergency Management & Business Continuity Program, and a high level of readiness and a coordinated response.

	Policy Name: Business Continuity Plan
	Corporate Health & Safety
	Form #	Adopted Date:
	Position Responsible: VP Quality Improvement	Revised Date:

lifemark

DEFINITIONS

Business Continuity (BC) includes business continuity, emergency preparedness, pandemic influenza or any disruption to normal operations.

Business Continuity (BC) Plan is the framework for building resilience and capability for an effective organization response and recovery to potential disruptive events. It includes the specific response and recovery protocols based on the routine functions and responsibilities of the "divisional site location". They provide detailed response and recovery protocols and ensure continuity of services through training, planning, testing and maintenance of the protocols.

Emergency Response Plan (ERP) directs Lifemark Health's response to emergencies, disasters, incidents.

Enterprise Risk Management Committee (ERM) is responsible for advancing and promoting an enterprise risk management framework, stewardship of Lifemark Health policy surrounding risk management and risk management practices, monitoring the risk profile of Lifemark Health and providing guidance and leadership related to changes in the development, implementation and monitoring of risk mitigation measures on an ongoing basis.

Information Security provides protection against accidental or malicious disclosure, modification, or destruction through implementing controls that protect the confidentiality, integrity, and availability of information and information systems. Information should be protected based on its value (sensitivity or criticality) and the risk of loss or compromise.

Information Technology (IT) Services include non-application specific services such as: email; printing; network drives, files, and folders; and computer network connectivity to internal and external information resources in the electronic domain. Information resources specific to the electronic domain include:
- Applications/software/databases
- Storage media/removable storage
- Personal Computers/Laptops/tablets/PDA's/Wireless devices
- Servers/minicomputers/mainframes
- Peripherals
- Data Centers/service centers/any facilities that house the above defined information

Pandemic is a disease that occurs throughout the population of a country or the world.

Pandemic Plan directs Lifemark Health's response to a declaration of a pandemic.

RESPONSIBILITIES
I. **Executive Management Team**
- Reflects risk management strategies in the corporate strategic plan.
- Provides resources for a Business Continuity Management program.

- Provides leadership in the management of disaster and/or emergency events.
- Receives updates on risk management strategies and initiatives through the Enterprise Risk Management Committee.

II.   Enterprise Risk Management Committee (ERM)

- Assesses the impact on the Lifemark Business Continuity Plan of additions or changes to existing business functions, procedures, equipment, and facilities requirements.
- Provides leadership, guidance, and acts as the coordinating body for identifying, analyzing and managing risk for Lifemark Health.
- Develops, implements, reviews and revises Lifemark Health risk management policies and procedures to identify, assess, control, monitor and measure Lifemark Health risk.
- Undertakes necessary activity to revise and monitor the Lifemark Health risk profile and supporting risk control activities on a regular basis.
- Ensures appropriate mechanisms are established and integrated into Lifemark Health's daily practice, enabling the management of risk, anticipating and preventing adverse outcomes and the evaluation of performance against standards, policies and regulations or legislation.
- Ensures the organization can withstand a test of diligence at all levels of the organization (which includes but is not limited to compliance testing of policies and procedures, internal and external review and audit).
- Supports education to facilitate understanding of risk management/business continuity throughout the organization.
- Reviews Lifemark Health's risk management related plans such as the Business Continuity Plan, Emergency Management Framework and any other contingency related plans on a regular frequency, as determined by Lifemark Health Senior Management Team.
- Ensures annual priorities for business continuity planning activities are established and monitored in recognition of business continuity being a major risk for Lifemark Group.

- **Membership**
    1. Director of Corporate Compliance (Co-Chair)
    2. Information Technology (Co-Chair)
    3. Executive Assistant to Quality Improvement & Innovation (Recorder)
    4. VP Quality
    5. Human Resources
    6. Finances
    7. Lifemark Rehab
    8. Lifemark Senior Wellness
    9. Lifemark CAR
    10. Viewpoint

III.   Business Continuity Lead
- Partners with the site/location BC team in the direction and support of business continuity planning for Lifemark Group business.
- Determines and partners with the Enterprise Risk Management Committee (ERM) and site/location BCP team in development of plans for business continuity educational needs.
- Where appropriate, makes and forwards recommendations to the Enterprise Risk Management (ERM) Committee on strategic initiatives to ensure optimal planning for and provision of services during an emergency, disaster, incident, or outage of information technology services and applications.
- Ensures implementation, communication and education of all Lifemark Health BC plans.
- Ensures consistent development and review of emergency response procedures, with adherence to the Lifemark Health BC plans.

IV.   Site BCP Teams
- Implements the BC plans at the site level.
- Determines Emergency Response Procedures (ERP) that apply to the specific site.
- Develops, implements, evaluates and annually reviews and updates accordingly the Site Plan in consultation with the designated Business Continuity Lead.
- Distributes updated plans to all relevant stakeholders at the site.
- Determines which information technology services and internal and external software applications the department is dependent upon, the severity of these dependencies, and the business processes that are affected if these services or applications abruptly become unavailable for an indeterminate period of time.
- Ensures services departments annually review and update accordingly their BC and emergency plans.
- Ensures departmental telephone fan-outs/phone trees are updated quarterly and as required.
- Ensures that site staff are knowledgeable and competent in their role in the event of a disaster, emergency, incident, or outage of information technology services or applications.
- Participates in an annual testing exercise of the BC Plan. The only exception would be if a site has experienced a major incident. Lessons learned and recommendation should be shared with staff.
- Communicates to and educates staff of changes to the site BC plan.

V.   Site Managers or Supervisors
- Ensures all employees who report to them receive orientation to site-specific emergency response plans and Business Continuity Plan.

VI.   All Staff
- Must be familiar with the Lifemark Health Plans for Business Continuity,

Emergency Preparedness and Pandemic as well as the relevant Site and Department Plans.

- Ensures familiarity with and follows Lifemark Health Emergency Response protocols as well as any specific site Emergency Response procedures.
- Attends and completes prescribed education and training programs.
- Ensures that personal contact information is current and accurate.
- Works as required in an emergency. In an emergency event, changes to normal job activities and locations may be required with minimal notice.
- Must be prepared to respond effectively in emergencies, disasters, incidents, and outages of information technology services and applications.

POLICY MANAGEMENT

The management of this policy including policy education, monitoring, implementation and amendment is the responsibility of the Enterprise Risk Management Committee.

NON COMPLIANCE

Non-compliance with Lifemark Health Policy and/or Procedures shall result in, at a minimum, a review of the incident. Non-compliance could also result in disciplinary actions up to and including termination of employment/contract/relationship with Lifemark Health.

RESOURCES

- Master Business Continuity Plan Lifemark Health

INCIDENT REPORTING & INVESTIGATION POLICY

Policy

Lifemark wishes to promote the safety of all its employees through accident prevention and compliance with provincial Occupational Health and Safety Act (OHSA). This policy sets out guidelines and procedures for the reporting and investigation of incidents.

Purpose

The purpose of incident reporting and investigation is to determine the cause(s), identify any unsafe conditions, acts other deficiencies that may be contributing factors and, where appropriate/applicable, make corrective recommendations to prevent reoccurrence. Incident investigations will be conducted whenever there is a workplace injury, accident, illness or exposure or where there is an incident where there was a potential for a work-related injury, accident, illness or exposure. No fault or blame is to be placed on any individual as a result of an investigation process.

Scope

This policy applies to all Lifemark staff, as well as, independent contractors providing services for or on behalf of Lifemark, and is inclusive to all incidents that occur in the course of work activities on Lifemark properties or during the delivery of Lifemark services off site.

INTERNAL – Contractor OHW Incident Report

Nurse Name:_____

Date of Incident	MM/DD/YYYY
Time of incident	
Type of Incident (ie, Fall)	
Clinic Name	
Clinic Location	
Site Contact Name	
Site Contact #	

Participant Name	
Contact Phone #	
Participant Email	

Describe the event, issue or situation. What happened?

Action taken

Who was notified	Nurse Signature	Date

For Office Use Only	
Report received date	Reviewed and online report submitted by
	Name: Date:

Outcome/ Follow-ups Notes	
Date incident report closed	

CLIENT & STAKEHOLDER COMPLAINT PROCESS

Policy

Each individual participating in any program, as well as all other key stakeholders, are provided with the opportunity to file a complaint about service or accessibility or appeal any decision made by the Lifemark staff, regarding their rehabilitation or wellness program without fear of reprisal or barriers to services.

Definition of a Formal Complaint: A consumer complaint or customer complaint is "an expression of dissatisfaction on a consumer's behalf to a responsible party" (Landon, 1980). It can also be described in a positive sense as a report from a consumer providing documentation about a problem with a product or service. A complaint can be received verbally, via phone, email or by any other means of communication.

Purpose

It is within the human rights and dignity of clients and stakeholders served to have the opportunity to question decisions regarding their or their client's rehabilitation or wellness program. This form of immediate feedback will also serve to ensure quality of service.

Procedure

1. Any client or stakeholder who verbalizes a complaint shall be informed that all complaints are taken seriously. As a first step, the individual will be encouraged to discuss their concern with the treatment provider. If the issue is not resolved the client or stakeholder will be requested to put their complaint in writing. This can be done using a Client Complaint Form or independently. The written complaint should be forwarded to the Account Manager.
2. With respect to verbal and written complaints the Account Manager shall address the issue within three days of receiving a written complaint. All relevant information will be reviewed including communication with the client and/or stakeholder and the treatment provider and a decision will be made on the best way to handle the situation. Strategies considered should include:
    a. When appropriate, a meeting can be set up between the client / stakeholder and specific party stated on the form to attempt to resolve the complaint.
    b. A therapy team meeting can be held with the client present.
    c. The Account Manger can further discuss the complaint with the client/stakeholder to come to a mutual agreeable resolution.
    d. A meeting with an independent Lifemark corporate director can be set up.
3. Any action taken to address the complaint shall be documented on the Client/Stakeholder Complaint Form.
4. All completed Client / Stakeholder Complaint Forms will be brought to the attention of the Account Manager and will be forwarded to the Director, Health and Wellness and the VP of Quality Improvement.
5. In cases where complaints are expressed but a form is not filled out, the staff member who received the verbal complaint will complete a form and submit it to the Account Manager who will contact the client to determine if the above strategies are warranted to resolve the complaint.
6. In cases where the client / stakeholder is not satisfied with the internal complaint resolution

process will escalate to the Corporate Leadership and information will be provided, without prejudice, on how to contact the appropriate Regulatory Board(s)for the discipline(s) addressed in the complaint.

Lifemark strives to have issues addressed within 72 hours.

CANCELLATION POLICY

Lifemark requires cancellation notice with 15 or more business days incurs no charge; otherwise, 100% of the applicable fees for the clinic will be applied.

15 business days – deadline for changes @ 0%

21 business days

Nurses / Coordinators scheduling begins

21 business days

Supplies ordered

12 business days

-Confirmation of clinics with nurses / coordinators

- Bins packed

-Affiliate equipment and supplies shipped out

10 business days*

Equipment and supplies shipped out including clinic schedule

5 business days

Reminder notification to nurses of clinic

CLINIC DAY