

Notification of Concern Guideline



Notification of Concern

1. Statement

Prevocational Medical Accreditation Queensland (PMAQ) administers a system of accreditation that ensures quality education and training for medical interns that enables the provision of safe patient care.

PMAQ is accredited by the Australian Medical Council as an Intern Training Accreditation Authority and has been approved by the Medical Board of Australia (MBA) to accredit Intern Training Programs and posts in Queensland.

The Medical Board of Australia's Registration Standard: Granting general registration as a medical practitioner to Australian and New Zealand medical graduates on completion of intern training defines the supervised intern training requirements that must be completed for Australian medical graduates to be eligible for general registration. As per the Registration Standard, training terms must be accredited against approved accreditation standards for intern training. It is PMAQ's responsibility to ensure that the Intern Training Programs (ITP) offered in Queensland meet the requirements of the Registration Standard.

Training providers accredited by PMAQ are responsible, throughout their period of accreditation, for ensuring their ongoing compliance with the PMAQ Accreditation Standards.

2. Purpose

The Notification of Concern procedure provides an opportunity for any party who is concerned that an accredited intern training provider may not be meeting the Prevocational Medical Accreditation Queensland (PMAQ) standards to notify PMAQ of their concerns.

PMAQ will review the information provided and determine the actions required. PMAQ will ensure all notifications of concern are afforded procedural fairness and natural justice.

3. Scope

This guideline applies to all facilities and sites in Queensland that deliver medical intern training programs.

4. Context

4.1 Definition of Concern:

Concerns are expressions of apprehension or dissatisfaction made to PMAQ about any aspect of an accredited intern training program and its compliance with the PMAQ standards. This includes but is not limited to:

- issues relating to the content of training provided to interns.
- issues relating to the management of the intern training program, including issues with staff.
- issues relating to patient or intern care and safety.

4.2 Who can raise a concern?

Concerns can be raised by interns, their advocates, staff from a training provider, external agencies, consumers and consumer organisations. Notifications of concern will ideally be made by an identified individual. This individual's identity will be kept confidential by PMAQ. PMAQ will seek as much information as possible from the complainant and may also seek information from the provider involved. If PMAQ decides not to investigate a concern further, both parties will be advised of PMAQ's decision. Such concerns may be noted and followed up in future accreditation reviews. It is recommended that anyone considering lodging a notification of concern contact PMAQ directly.

PMAQ supports early and local resolution of concerns. Before lodging a notification of concern, PMAQ recommends contacting the Director of Clinical Training, a staff member from the provider's Medical Education Unit or a member of the provider's leadership team directly as this is often the quickest and easiest way for problems to be addressed. Where this isn't possible, or the issue has not been addressed to the satisfaction of the complainant the concern may be raised in writing with PMAQ. PMAQ notifications of concern may be raised:

- via email to pmaq@health.qld.gov.au or post to PO Box 48, Brisbane 4001
- over the phone or in person to the Manager or another member of the PMAQ

4.3 Concerns identified during an accreditation assessment:

Members of PMAQ accreditation assessment teams may raise concerns during accreditation assessments. In most cases these concerns are managed through the accreditation assessment process, or if outside the scope of the PMAQ Accreditation Standards referred to the training provider's executive for further management.

In addition to the process outlined below for managing the assessment of a concern where PMAQ becomes aware of any circumstances at an intern training provider, during an accreditation assessment, that give rise to a significant risk to patient safety or intern wellbeing the PMAQ accreditation assessment team is required to immediately:

- notify the Chief Executive responsible for the Intern Training Program together with recommendations for the appropriate remedial actions to be taken and the timeframe for this.
- notify the Chair, PMAQ Accreditation Committee that the concern has been raised.

The Accreditation Committee may then, at their discretion, notify Queensland Health and provide recommendations for action where the provider's actions have proven to be inappropriate or inadequate to remedy the risks within an appropriate timeframe.

4.4 Concerns raised with a PMAQ Accreditation Assessor or Accreditation Committee member

Accreditation Committee members maybe directly approached with the intent to advise of a concern. In this situation the Committee member should abstain from eliciting specific details or providing advice in relation to the concern and should direct the complainant to contact PMAQ directly via email, phone or in person.

5. Assessment of Concerns:

Notifications of Concern's received outside a scheduled accreditation assessment will be managed as follows:

5.1 Initial Assessment

PMAQ agency staff will:

- acknowledge and register the concern within 5 working days
- clarify issues with the individual(s) raising the concern, and if within the scope of the PMAQ Accreditation Standards, gain as much information as possible about the circumstances. If the concern is outside the scope of the PMAQ accreditations standards, advice will be provided to the individual(s) on alternate pathways to address the concern.
- explain to the individual(s) raising the concern the process for the management of concerns.
- inform the PMAQ Accreditation Committee of the concern.
- The training provider will be notified of the concern in writing.

5.2 Responding to the concern raised:

The PMAQ Accreditation Committee may decide to take no further action, seek additional information or take immediate action. Irrespective of the Committee's decision, the training provider's executive will be notified that a formal notification of concern had been received, and of the Committee's decision regarding a further course of action. The PMAQ Accreditation Committee will:

- notify the relevant training provider's executive of the concern and seek a response in relation to the concern
- review the information available about the notification of concern with consideration given to:
 - the impact on intern safety, patient safety or the provision of patient care
 - the severity and likelihood of the issue including if the concern has previously been raised

- the impact the issue has had or may have on the delivery of the Intern Training Program
- the relationship of the issue to the PMAQ standards
- Seek an initial response from the provider and determine the timeframe for this response
- Any further immediate action required pending the provider's response.

Following receipt of the training provider's response, the accreditation committee will consider:

- the appropriateness of the intern training provider's response to the notification
- determine if the response evidences ongoing compliance with the PMAQ accreditation standards
- the provider's ability to implement timely, sustainable, and effective strategies to avoid any negative consequences or rectify any negative consequences as a result of a change
- evidence that the PMAQ accreditation standards continue to be met, and should there have been a deviation from the standards, how the provider identified and responded to this
- ensure the issues raised fall within the remit of PMAQ under the delegated authority from the Medical Board of Australia to adjudicate upon and make decisions about intern accreditation in Queensland.
- Evaluate PMAQ's response to the concern raised

5.3 No further action:

The Accreditation Committee will:

- inform the individual(s) that raised the concern and the relevant provider of the decision to take no further action and the reasons for this decision.
- record the details of the concern for future reference.
- ensure that future accreditation assessments include consideration of the issues raised.

5.4 Further action required:

Where the decision is made to assess a concern further, PMAQ will determine the best course of action using PMAQ's existing accreditation assessment and quality assurance processes.

5.5 Finalising a concern:

The Accreditation Committee will:

- inform the individual(s) that raised the concern of the finalisation of the response to the concern.
- provide the relevant provider with a copy of the final report, if applicable.
- notify the relevant provider of their rights and the process for seeking review.

6. Notifications that are ‘Out-of-scope’:

Notifications of concern that are considered out-of-scope will be re-directed, with the support of the individual raising the concern, to an appropriate agency for management.

7. Timeframes for responding to concerns:

Concerns are expected to be acknowledged within 5 working days of receipt. Most concerns are expected to be finalised within 60 working days, acknowledging that complex concerns may take longer to finalise.

Version Control

Version	Date	Comments
.1	21 May 2020	Initial draft
.2	1 October 2020	Endorsed by Accreditation Committee
1	28 October 2020	Approved by the DDG Prevention Division