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Royal Australian College *of* General Practitioners

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Training organisation adverse event and critical incident reporting guideline

RACGP Fellowship Pathways I Quality and Compliance

1. Introduction and intention

This document provides guidance for identifying adverse events and critical incidents, and the requirements for reporting to the Royal Australian College of General Practitioners (RACGP). This guideline relates to reporting by training organisations to the RACGP in the delivery of vocational training, referred to in this guideline as 'programs'.

Guideline intention

This guideline intends to assist training organisations in the reporting process related to adverse events and critical incidents. It includes identifying whether an event is required to be reported to the RACGP.

Definitions of an adverse event and what makes an adverse event a critical incident, and reporting requirements, are detailed.

Role of training organisations

Training organisations play a vital role in the delivery of programs.

Training organisations support and monitor the day-to-day wellbeing and progress of GPs in training (GPiTs).

Training organisations work closely with GP supervisors and training practice staff. Due to these relationships, the RACGP recognises that training organisations are well placed to address many adverse events that occur in connection to programs. Some events may escalate to critical incidents that require reporting to the RACGP.

It is the responsibility of the training organisations to report adverse events and critical incidents to the RACGP in line with the guidelines below. Evidence of adherence to this is necessary for training organisation accreditation.

Incident reporting is not punitive, nor does it necessarily mean that there has been some failure in a training organisation's internal monitoring system. Quality improvement is at the heart of this activity.

Training organisations are required to educate GPiTs, supervisors and training practices on the need to notify the training organisation of adverse events, critical incidents and significant complaints or issues, as listed below. Procedures, training and reminders should be in place to raise awareness and support understanding of reporting requirements.

Role of the RACGP

Under its Australian Medical Council requirements,

the RACGP is responsible for ensuring that trainee safety and patient safety are protected. Adverse event and critical incident reporting is important for meeting this responsibility. Furthermore, understanding trends in adverse events provides the opportunity for quality improvement for all stakeholders involved.

In addition, the reporting process enables the RACGP to effectively address the negative outcomes of a critical incident and to mitigate the consequent risks.

Relationship between training organisations and the RACGP

The RACGP sees its relationship with training organisations as a mutually supportive one, scaffolded by their contractual arrangements. The RACGP is keen to support training organisations in meeting training standards or obligations that include the duty of care by the training organisation to the GPiT. Reporting and dealing with critical incidents or adverse events are joint endeavours between the RACGP and the training organisation network.

2. Definitions

For the purposes of this guideline, the following definitions are used.

2.1 Adverse events

An adverse event is any disruptive event that causes, or risks causing, significant harm to patients, GPiTs, GP supervisors, practice staff, training organisation staff or the associated organisations involved in program delivery. These may include events or circumstances including, but not limited to, where the training organisation:

2.1.1 undertakes an action to address a GPiT deemed at risk

2.1.2 receives and responds to a complaint or notice of concern related to a program

2.1.3 has a negative stakeholder relationship experience

2.1.4 experiences an adverse event impacting a patient

2.1.5 is aware of difficulties in the functioning of its program, particularly in its capacity to meet the program intent and/or requirements (staffing, systems, processes, etc)

2.1.6 has difficulty in resolving a grievance, a dispute, an appeal or a request for reconsideration.

2.2 Critical incident

A critical incident is any adverse event that has resulted in a serious negative outcome for patients, GPiTs, GP supervisors, practice staff, the training organisation and/or its staff, the RACGP and/or its staff, a program reputation or any combination of these.

All critical incidents must be reported to the RACGP. Critical incidents include:

2.2.1 serious personal injury or death of a GPiT in connection to their Fellowship pathway participation

2.2.2 a serious negative outcome for a patient managed by the GPiT

2.2.3 a serious threat of, or an actual sustained disruption to, a training organisation's program activities

2.2.4 a significant complaint or issue that may result in reputational damage for the GPiT, supervisor, practice, training organisation or the RACGP

2.2.5 the involuntary removal of vocational training accreditation of a training post and/or GP supervisor

2.2.6 mandatory notification of a GPiT or GP supervisor to the Australian Health Practitioner Regulation Agency (AHPRA)

2.2.7 removal of a GPiT from a training facility under the training organisation's 'GPiT at risk' or similar policy.

3. Reporting

3.1 Reporting requirements

All critical incidents must be reported.

Other adverse events that require reporting to the RACGP are those where:

3.1.1 there is a risk of escalation of the incident with time

3.1.2 significant hostility or aggression is involved

3.1.3 the incident and its associated risks have not been resolved under the training organisation's internal incident investigation and management processes within a reasonable timeframe

3.1.4 RACGP resources and expertise could assist with the circumstances

3.1.5 the training organisation would be reasonably expected to inform the RACGP, particularly in relation to contractual and fiduciary matters

3.1.6 there are associated training organisation accreditation monitoring requirements in place, or the training organisation has been asked by the RACGP to report on specific incidents as part of the accreditation monitoring outcomes.

It is recommended that training organisations notify the RACGP of adverse events, even when it is not mandated for reporting, which allows the RACGP better oversight of trends in adverse events nationally.

3.2 Reporting process

Concurrent with managing a reportable adverse or critical event, training organisations will:

- discuss the situation or event with the relevant censor, including outlining the steps undertaken by the training organisation after first becoming aware of the information
- document the event and subsequent management on the Critical incident and adverse events report form
- send the completed report to criticalincidents@racgp.org.au

4. Monitoring

4.1 All adverse events must be actively monitored by the training organisation until a satisfactory resolution is achieved.

4.2 The relevant RACGP censor and national clinical lead – education enhancement and remediation will liaise with the training organisation as required, and be available for advice and support.

4.3 The RACGP may request a random file audit of adverse events internally managed by the training organisation. This will involve the RACGP reviewing documents related to the internal management of risks related to the delivery of GP education. Training organisations will be expected to share documents with the RACGP within 20 business days once requested. Details of information required will accompany the document request.

4.4 An adverse event register will be maintained by training organisations. This will be reviewed by the RACGP as part of training organisation accreditation processes.

4.5 Adverse event monitoring will form part of training organisations' quality-improvement processes.

5. Communication

5.1 All email communication should be sent to the RACGP at criticalincidents@racgp.org.au For any critical incidents, it is expected the RACGP will receive the report without any unreasonable delay, recognising the importance of the model of shared risk management, which is inherent in the delivery of RACGP education programs.

5.2 The RACGP will send an email acknowledgement of each report within 10 business days.

5.3 The RACGP will provide the training organisations with the outcome of the internal review of each report, and will provide the training organisations with feedback within 20 business days. As a result of this review, the RACGP may:

5.3.1 ask for additional information or clarification of information provided

5.3.2 request to work with the training organisation to support any ongoing situation of shared risk

5.3.3 request that the training organisation provide periodic reports on the circumstances of shared risk where the incident may have an ongoing impact

5.3.4 advise that the incident can be closed and no further action is required by the training organisation.

5.4 The RACGP will manage information in accordance with the RACGP Privacy policy. The RACGP and the training organisation are required to share information relevant to the circumstances in order to meet mutual obligations in the delivery of programs. This will be for legitimate and justifiable training purposes that are within the bounds of training contracts and in accordance with privacy laws. Identification of parties involved allows accurate and timely support from the RACGP. Where there is uncertainty around identifying individuals in a report, the training organisation should discuss this with the national clinical lead – education enhancement and remediation.

5.5 If any information shared by the training organisation to the RACGP as part of the reporting process is viewed as being potentially in conflict with privacy requirements, this should be discussed with the RACGP clinical lead – education enhancement and remediation.

5.6 The intention of any ongoing communication is to support the training organisation and RACGP in meeting their obligation for safe and effective program delivery and to foster an increased appreciation of each other's risk management procedures and requirements.

6. Document references

- RACGP Accreditation management agreement
- RACGP Standards for general practice training – Criterion 1.1.1.4
- PEP Training organisation agreement
- RACGP Training organisation adverse event and critical incident report form

We acknowledge the Traditional Custodians of the lands and seas on which we work and live, and pay our respects to Elders, past, present and future.