

Accreditation Concern Escalation Protocol

Purpose and Scope

The purpose of this guideline is to outline the escalation protocol for any significant concerns that are raised that may require immediate action or further investigation.

Context

The Postgraduate Medical Council of Victoria Inc. (PMCV) is approved as a Prevocational (PGY1/PGY2) training accreditation authority.

The purpose of prevocational medical training is:

To develop, monitor and evaluate accreditation standards and processes for the provision of prevocational medical education and training and for promotion of junior doctor wellbeing and safe quality patient care.

In Victoria, prevocational training programs and posts must be accredited by PMCV prior to the commencement of the post within the health facility. PMCV is authorised to monitor standards to ensure patient safety and high-quality clinical training for prevocational doctors.

PMCV monitors the education and training provided to prevocational doctors across a four-year accreditation cycle. The structured Accreditation review processes include survey visits (every four years), mid-cycle reviews (every two years) and the Conditions Monitoring Process (CMP).

What is a Concern:

Significant concerns are expressions of apprehension, anxiety or dissatisfaction advised to PMCV about any aspect of an accredited health service which may or may not relate to their compliance with the AMC's National Framework Accreditation Standards. This includes but is not limited to:

- issues relating to the governance of the health service, including issues with individual team members.
- Any issues relating to bullying, harassment and/or discrimination.
- issues relating to patient or prevocational trainee safety.

Method to raise a Concern:

Notifications of concern will ideally be made by an identified individual. This individual's identity will be kept confidential by PMCV. PMCV will seek as much information as possible from the complainant and may also seek information from the health service involved.

If PMCV decides not to investigate a concern further, both parties will be advised of PMCV'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 PMCV directly. In the event, of the issue raised sits outside of the scope of PMCVs work, it may be raised with an alternate agency.

PMCV supports early and local resolution of concerns. Before lodging a notification of concern, PMCV recommends contacting the Director of Clinical Training, a member of the Medical Education Unit or of the health service'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 PMCV.

PMCV notifications of concern may be raised:

- via email to accreditation@pmcv.com.au or post to PO Box 13330, Law Courts, VIC, 8010
- over the phone or in person with the PMCV Accreditation Manager or delegate
- Contact us page on the PMCV website.

Who can raise a Concern?

Concerns can be raised by:

- Prevocational doctors.
- Their advocates.
- Staff from a health service.
- External agencies; and/or
- Consumers and consumer organisations.

Concerns identified during an accreditation assessment:

Members of PMCV accreditation survey teams may raise concerns during accreditation assessments. In most cases, these concerns will be managed through the accreditation survey process, or if outside the scope of the AMC's National Framework Accreditation Standards, this will be referred to the health service's executive for further management.

During an accreditation assessment, if a significant risk to patient safety or prevocational doctor wellbeing the PMCV accreditation survey team leader is required to act immediately:

- Notify the Chief Executive or delegate responsible for the health service together with recommendations for the appropriate remedial actions to be taken and the timeframe for this.
- Notify the Chair, PMCV Accreditation Committee that the concern has been raised; and
- Notify the Chief Executive, PMCV that the concern has been raised.

The Accreditation Executive in consultation with the PMCV Chief Executive, notify the Department of Health with recommendations for action where the health service's actions have proven to be inappropriate or inadequate to remedy the risks within an appropriate timeframe. Department of Health Escalation Matrix can be referred to for further information.

Concerns raised with a PMCV Accreditation Survey Team member or Accreditation Committee member.

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

Assessment of Concerns

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

Initial Assessment:

The PMCV Accreditation Team will:

- acknowledge and register the concern within five (5) working days.
- clarify issues with the individual(s) raising the concern, and if within the scope of the AMC's National Accreditation Standards, gain as much information as possible about the circumstances. If the concern is outside the scope of the AMC's National Accreditation 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 PMCV Accreditation Committee of the concern; and
- the health service will be notified of the concern in writing.

Responding to a concern raised:

The PMCV Accreditation Committee may decide to take no further action, seek additional information, or take immediate action. Irrespective of the Committee's decision, the health service'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 PMCV Accreditation Committee will:

- notify the relevant health service executive of the concern and seek a response in relation to the concern; and
- review the information available about the notification of concern with consideration given to:
 - the impact on prevocational doctor 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 Training Program.
 - the relationship of the issue to the AMC's National Framework Accreditation Standards.
 - Seek an initial response from the health service and determine the timeframe for this response; and
 - Any further immediate action required pending the health service's response.

Following receipt of the health service's response, the Accreditation Committee will consider:

- the appropriateness of the health service's response to the notification.
- determine if the response is evidence of ongoing compliance with the AMC's National Framework Accreditation Standards.
- the health service'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 AMC's National Framework Accreditation Standards continue to be met and should there have been a deviation from the standards, how the health service identified and responded to this.
- ensure the issues raised fall within the remit of PMCV under the delegated authority from the Medical Board of Australia to judge upon and make decisions about prevocational doctor accreditation in Victoria; and
- evaluate PMCV's response to the concern raised.

No further action:

The Accreditation Committee will:

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

Further action required:

Where the decision is made to assess a concern further, PMCV will determine the best course of action using PMCV’s existing Concerns Monitoring Progress and quality assurance processes.

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 health service with a copy of the final report, if applicable; and
- notify the relevant health service of their rights and the process for seeking review.

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.

Timeframes for responding to concerns:

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

Version Control

Version approved along with date of next review.

Version	Amendments by	Changes	Date
1	Natalie Ward	Initial Draft	25 March 2024

Approved by	Accreditation Committee
Next Review	
Date	