

**PMAQ**

# Notification of Concern Guideline



# Notification of Concern

## 1. Statement

Prevocational Medical Accreditation Queensland (PMAQ) is committed to the delivery of fair, impartial and transparent accreditation system that assures and promotes quality education and training for prevocational doctors, providing for their wellbeing, the provision of safe patient care and training that meets the health needs of the community.

PMAQ is accredited by the Australian Medical Council as a prevocational training accreditation authority. The Medical Board of Australia (MBA) has approved PMAQ to accredit prevocational year one training programs and the Health Chief Executive Forum has endorsed the accreditation of prevocational year two training programs.

The *National Framework for Prevocational (PGY1 and PGY2) Medical Training* (the framework) determines the standards and requirements with which both PGY1 and PGY2 prevocational training programs must meet. These are defined in the *National standards for prevocational (PGY1 and PGY2) training programs and terms (the national standards)*. Specific to the PGY1 year, these standards require programs to meet the requirements of the Medical Board of Australia's (MBA's) [Registration standard: Granting general registration as a medical practitioner to Australian and New Zealand medical graduates upon completion of postgraduate year one training, which](#) (the registration standard) defines the requirements for eligibility for general registration on completion of the PGY1 year

PGY2 doctors who undertake training within an accredited PGY2 training program are exempt from the MBA's *Registration standard: Continuing professional development*. On successful completion of the PGY2 program requirements, PGY2 doctors are eligible to receive a certification of completion.

Accredited prevocational training providers are responsible for the standard of the prevocational training program overall and its ongoing compliance with the standards. PMAQ, however, monitors accredited providers throughout their period of accreditation to ensure ongoing compliance and support quality improvement. A number of processes support this monitoring function, with a key process being the ability of interested parties to raise concern in relation to a program's compliance.

## 2. Purpose

The Notification of Concern procedure describes the process for any party concerned that an accredited prevocational training provider may not be meeting any component of the *National standards for prevocational (PGY1 and PGY2) training programs and terms* against which they are accredited. The actions to be taken by PMAQ in response to receipt of such information are also described and purposefully designed to afford procedural fairness and natural justice.

## 3. Scope

This guideline applies to all accredited prevocational training providers (inclusive of their partner facilities and sites) in Queensland that deliver prevocational medical 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 prevocational training program, either PGY1, PGY2, or both, and its compliance with the national standards. This includes but is not limited to:

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

### 4.2 Who can raise a concern?

Concerns can be raised by prevocational doctors, 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 or assessments. 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 is not 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](mailto: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 team.

## 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 national 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 accredited prevocational training provider, during an accreditation assessment, that give rise to a significant risk to patient safety or prevocational doctor wellbeing, the PMAQ accreditation assessment team is required to immediately:

- notify the Chief Executive responsible for the accredited 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, seek immediate remedy from the provider, notify Queensland Health or 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 may be 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 concerns received outside a scheduled accreditation assessment will be managed as follows.

## 5.1 Initial Assessment

PMAQ staff 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 national standards, gain as much information as possible about the circumstances. If the concern is outside the scope of the national 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 Chair, PMAQ accreditation committee of the concern and subsequently the committee.
- Notify the training provider 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.

Should the PMAQ Accreditation Committee decide further action or additional information is required they 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 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 prevocational training program (PGY1, PGY2, or both); and
  - the relationship of the issue to the national standards.
- Seek an initial response from the provider and determine the timeframe for this response.
- Take 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 prevocational training provider's response to the notification.
- Determine if the response evidences ongoing compliance with the national standards and requirements.
- 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 national 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 as defined by the National framework for prevocational (PGY1 and PGY2) medical training.
- 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 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.
- Advise the provider in writing of the findings, outcome and notification of the finalisation of the concern.
- 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 not within the scope of PMAQ 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 five (5) five 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	Date	Comments
0.1	21 May 2020	Initial draft
0.2	1 October 2020	Endorsed by Accreditation Committee
1	28 October 2020	Approved by the DDG Prevention Division
2.0	13 September 2024	Updated to reflect changes resulting from implantation of the <i>National Framework for Prevocational (PGY1 and PGY2) Medical Training</i> . Approved by the ADDG Workforce Strategy Branch, Clinical Planning & Service Strategy Division