



HSE National Incident Management Team
Quality and Patient Safety Directorate
Dr Steevens' Hospital
Dublin 8

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Tel. +353 (0)1 635 2003 / 2291 / 2099

Comments/Feedback on DRAFT National Incident Management Policy and Procedures.

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Name of Commentator: Irish Medical Organisation
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Please highlight both positive and negative feedback on the sections reviewed.

Page	Section	Par	Comment
7	4		In the Glossary of terms and definitions there is a need to define harm and serious incident (which includes serious harm) further. There is also a need to include a definition of "Incident Management Team" in the Glossary of terms and definitions. It is unclear if the Incident Management Team refers to the Local Incident Management Team as described in the Support Document 1 page 77
9	5.2.1		Determination of need to escalate the incident to the ISA Office (See Section 6.6...) The criteria in section 6.6 describe the incidents that require escalation to the NIMT – there is no criteria described for escalation to the ISA Office
10	5.2.2		Determination of need to escalate the incident to the RDO Office (See Section 6.6...) The criteria in section 6.6 describe the incidents that require escalation to the NIMT – there is no criteria described for escalation to the RDO Office

Additional Comments

Focus on Prevention

In addition to developing an Incident Management Policy there is a need to develop a Risk Management Policy and assure that systems are in place that prevent error and incidents that lead to harm rather than focussing on apportioning blame when errors occur.

Systems for Investigating Incidents leading to Harm

The Guidelines for Systems Analysis Investigation of Incidents which contains numerous references to identifying deviations from safe/acceptable practice overly focuses on apportioning blame. There are a range of systems available for investigating incidents that lead to harm. It is important that the appropriate methodology is employed to each individual incident.

Alignment with the Medical Council Performance Review Process

The process of performance review which has the potential to overlap considerably with the new procedures in the Medical Council. The procedures in relation to assessments of competence need to be aligned with the Medical Council Performance Review process. Serial reviews of performance using similar methodology - or worse still using different methodology - arising out of the same incident should be avoided.

Remediation

There seems to be no specific reference to what should happen where the outcome of an assessment indicates that remediation is required. While this might fall outside the scope of incident management, some clarity on principles and/or procedures in place is required to build confidence in the incident management process.

Indemnity

There are a range of complex issues in relation to indemnity and these need to be clarified.

The Irish Medical Organisation would be pleased to further discuss the issues raised in detail.