Notifiable Incident Reporting

Procedure for Contracted Providers

Name of function	Notifiable Incident Reporting for Contracted Providers
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1. PURPOSE

Notifiable Incident reporting supports WA Primary Health Alliance's ability to ensure the provision of safe and quality care, conduct good performance and risk management, and engage in continuous quality improvement. In addition, Notifiable Incident reporting provides opportunities for WAPHA to improve its commissioning process and support quality improvement at both service and sector level.

This procedure outlines the requirements for the reporting of Notifiable Incidents pertinent to all relevant contracts serviced by Contracted Providers.

The purpose of this procedure is to:

1. Establish a clear process for Contracted Providers to follow for the reporting of Notifiable Incidents.
2. Ensure Notifiable Incidents are managed and reviewed in the context of good performance management and quality improvement.

2.0 SCOPE

This procedure applies to:

- The reporting of Notifiable Incidents by WAPHA Contracted Providers.

This procedure does not apply to:

- Feedback or complaints regarding a Contracted Provider, regardless of whether that service or provider is contracted by WAPHA.
- Feedback or complaints that are not deemed a Notifiable Incident about the safety and/or quality of a Contracted Provider Service should be managed in accordance with the Complaints and Appeals Management Policy.
- Complaints about WAPHA's staff or service. Complaints should be managed in accordance with the *Complaints and Appeals Management Policy*.

3.0 PROCEDURE

3.1 Submission

1. Following the identification of a Notifiable Incident, you or an appropriate representative from your organisation (a WAPHA Contracted Provider) must report the Notifiable Incident to WAPHA The Notifiable Incident Report must be made using the Notifiable Incident Report Form, which can be accessed using this link: https://wapha.foliogrc.com/contracts/new?contract_template=20&token=7oqrxJsJ5xRGzxJHjKAT

2. The Notifiable Incident must be reported to WAPHA no later than forty-eight (48) hours from the date that your organisation became aware of the Notifiable Incident.

3. If there is any uncertainty as to whether the incident meets the definition of a Notifiable Incident, it is recommended that the incident be reported. WAPHA will then advise if the incident is out of scope.

4. When completing the Notifiable Incident Report Form, you will need to provide information about your organisation, the contract between your organisation and WAPHA, and details of the incident. Details of the questions in the Notifiable Incident Report Form is provided at Attachment A.

5. For data governance and privacy reasons, please do not provide identifying information, such as name or date of birth, for any of the individuals involved (including the patient and staff involved). You can instead use the persons initials, job title or role.

6. Following submission of the Notifiable Incident Report Form, you will receive an automatically generated email from ClinGov@wapha.org.au verifying that the Notifiable Incident Report Form has been submitted. This will be sent to the email that you nominated in the form.

7. WAPHA's IT system (DoneSafe) will automatically generate a unique identifier for each reported Notifiable Incident. This unique identifier will be included in the automatically generated email following submission for the Notifiable Incident Report Form. This unique identifier will be used by WAPHA in all communication with your organisation about this Notifiable Incident.

8. Your organisation must not wait for direction or advice from WAPHA regarding the Notifiable Incident. Your organisation is expected to manage and respond to the Notifiable Incident in accordance with relevant policies and procedures. WAPHA will not provide direction or advice regarding the management of Notifiable Incidents.

3.2 Confirmation

1. On receipt of the completed Notifiable Incident Report Form, WAPHA's Clinical Governance Officer will contact your organisation's representative as nominated in the Notifiable Incident Report Form. This will be by phone within 1 Working Day to:
    a. Confirm that the Notifiable Incident Report Form has been received and that a unique identifier will be assigned to this Notifiable Incident.
    b. Ask the Representative to confirm what action that has/will be taken in response to the Notifiable Incident (this should be verbal confirmation of the

actions identified in the Notifiable Incident Form).

c. Advise that an email will be sent confirming WAPHA's next steps.

2. This phone call will be followed by an email to confirm your organisation's nominated representative that the Notifiable Incident Report Form has been received and is being reviewed by WAPHA.

3. The relevant WAPHA Contract Manager/s and Operational Manager will be copied into this email.

4. Your organisation is responsible for proceeding with the appropriate action in response to the reported Notifiable Incident, in accordance with your organisational policies.

3.3 Review

1. WAPHA will allocate the incident a Severity Allocation Code.

2. The Notifiable Incident Report Form will be reviewed by the Clinical Safety and Quality Committee or a subgroup of that Committee.

3. Your organisation may be asked to provide further information about the incident or further action to be taken in response to the incident. For example, the Contracted Provider may be asked to:
   - Confirm whether an investigation of the incident will be undertaken (see Appendix B) and, if so, provide a copy of the final report.
   - Provide a further summary of action taken following the Notifiable Incident.
   - Confirm that any additional relevant organisations or bodies were advised of the incident.

4. Where a Contracted Provider has undertaken an investigation of the Notifiable Incident (see Appendix B), a copy of the report must be provided to WA Primary Health Alliance via email (clingov@wapha.org.au) no later than 60 calendar days from the date that the incident was reported to WA Primary Health Alliance. The report must be redacted to remove any personal identifying information and WA Primary Health Alliance only requires information pertaining to contributing factors, key findings and any recommendations made.

5. The purpose of WAPHA's Clinical Safety and Quality Committee in reviewing Notifiable Incidents is to:
   - Support the provision of safe and quality care in WAPHA Contracted Services.
   - Support good performance and risk management.
   - Support WAPHA's internal continuous quality improvement, particularly around WAPHA's commissioning process.
   - Identify trends and patterns related to safety and quality that may benefit from a system wide response.

3.4 Closing the Notifiable Incident

1. A letter signed by the Chair of the Clinical Safety and Quality Committee will be provided

to the Contracted Provider's Representative by email within 30 calendar days of receipt of the Notifiable Incident Report Form. This letter will include a summary of any action taken by WAPHA or the Contracted Provider. Once this letter has been sent, the Notifiable Incident is deemed to be closed.

2. If actions related to the Notifiable Incident are not complete within 30 days of receipt of the Notifiable Incident Report Form, a letter will instead be sent to the Contracted Provider to summarise any action taken by WAPHA or the Contracted Provider, and any action yet to be completed. Where a Contracted Provider is undertaking an investigation of the incident, the letter will confirm the date that the final report is due to be provided to WA Primary Health Alliance. This date will be 60 calendar days from the date that the incident was reported to WA Primary Health Alliance.

4.0 RELATED DOCUMENTS

4.1 Policies

WA Primary Health Alliance Clinical Governance Framework
WA Primary Health Alliance Notifiable Incidents Policy
headspace Clinical Governance Framework
headspace Centres Serious Incidents and Complaints Reporting Policy

4.2 Legislation

Privacy Act 1988 (Cwth)

5.0 DEFINITIONS

Contract Manager
Refers to the WAPHA staff member responsible for managing the relevant Contracted Service, as documented in WAPHA's Contract Management System (Open Windows).

Contracted Provider
Refers to an organisation that has entered into a contractually binding agreement with WAPHA for the provision of a service.

Contracted Service
Means a service provided by a Contracted Provider as an obligation under a contract with WAPHA which includes a requirement for the Contracted Provider to comply with any policies or procedures communicated by WAPHA to the Contracted Provider in writing from time to time.

Notifiable Incident
An incident that occurs within a WA Primary Health Alliance funded Service, and is where harm or death is, or could have been (Near Miss), specifically (or suspected to be) caused by the Clinical Services rather than by the underlying condition or illness of the person receiving the Clinical Services.

It also includes any 'reportable death', as defined in the Coroners Act 1996.

Reportable Death
A Reportable Death as defined by the *Coroners Act 1996*, is:

a Western Australian death —

a) that appears to have been unexpected, unnatural or violent or to have resulted, directly or indirectly, from injury; or
b) that occurs during an anaesthetic; or
c) that occurs as a result of an anaesthetic and is not due to natural causes; or
d) that occurs in prescribed circumstances; or
e) of a person who immediately before death was a person held in care; or
f) that appears to have been caused or contributed to while the person was held in care; or
g) that appears to have been caused or contributed to by any action of a member of the Police Force; or
h) of a person whose identity is unknown; or
i) that occurs in Western Australia where the cause of death has not been certified under section 44 of the Births, Deaths and Marriages Registration Act 1998; or

that occurred outside Western Australia where the cause of death is not certified to by a person who, under the law in force in that place is a legally qualified medical practitioner.

6.0 ROLES AND RESPONSIBILITIES

Clinical Safety and Quality Committee

The Clinical Safety and Quality Committee is responsible for:

- Providing advice to the CEO, Executive team and Managers on issues relating to the reporting of Notifiable Incidents.
- Reviewing all Notifiable Incidents and associated correspondence on a monthly basis.
- Reviewing a cumulative monthly summary of all Notifiable Incidents and monitoring trends in Notifiable Incidents at Contracted Provider and sector level.
- Providing quarterly advice on Notifiable Incidents to the Executive team and the Board.
- Leading a 'safety culture' and a culture of openness and transparency at WAPHA.

Clinical Governance Officer

The Clinical Governance Officer is responsible for:

- Acting as the coordination point for all Notifiable Incident reports.
- Ensuring that Notifiable Incidents are managed in accordance with WAPHA's *Notifiable Incidents Policy*.
- Reviewing Notifiable Incidents and identifying possible trends and/or opportunities for quality improvement, referring such issues to the Clinical Safety and Quality Committee.
- Liaising with relevant WAPHA staff to promote integration across feedback, complaints and Notifiable Incidents.
- Advising staff regarding clinical governance processes (as per relevant policies), and escalating questions or concerns to the Clinical Safety and Quality Committee.
- Coordinating the provision of monthly and quarterly summaries of all Notifiable Incidents to the Clinical Safety and Quality Committee, Executive and the Board.
- Ensuring appropriate and accurate record keeping.

Contract Manager

The Contract Manager is responsible for:

- Promoting and supporting the principles of effective clinical governance systems to Contracted Providers.
- Ensuring understanding and awareness of clinical governance policies and procedures.
- Referring Notifiable Incidents or concerns about safety to their Line Manager.

- Promoting a ‘safety culture’ and a culture of openness and transparency.

Contracted Providers
Contracted providers are responsible for:

- Ensuring appropriate service-level clinical governance policy and processes are in place.
- Notifying WA Primary Health Alliance when a Notifiable Incident occurs, in accordance with WAPHA’s *Notifiable Incidents Policy*.

Attachment A

The below is a copy of the questions that will need to be answered in the Notifiable Incident Report Form. The Form must be completed and submitted via DoneSafe: https://wapha.donesafe.com/module_records/public_new?module_name_id=22%0d

	Field	Description
1	**Name of Contracted Provider**	Enter the name of your organisation.
2	**Name of Contracted Service**	Enter the name of the *service* that is funded by WAPHA.
3	**PHN**	From the drop down box, select the PHN that your organisation provides services in. Perth North, Perth South, Country WA or state-wide If unsure, select 'unsure'.
4	**Contract Number/s**	Enter the contract number/s for the contract between your organisation and WAPHA, relevant to the service in which the Notifiable Incident occurred.
5	**Position of staff member reporting**	Enter your role/position title.
The next few questions require you to nominate an appropriate person from your organisation to be the 'Contracted Provider's Representative'. This may be the person reporting the incident or it may be another staff member. WAPHA will communicate with the 'Contracted Provider's Representative' about this Notifiable Incident and nominated Contracted Provider Representative will receive all correspondence related to this Notifiable Incident.		
6	**Does the Contracted Provider's Representative use an email address that is shared to report this incident?**	If the Contracted Provider's Representative uses a shared or generic email address (ie manager@service.org.au), please select 'shared'. If the Contracted Provider's Representative uses an individual email address (ie john.smith@service.org.au), please select 'Individual'
7	**Name of Contracted Provider's Representative**	Enter the name of the staff member you would like WAPHA to communicate with about this Notifiable Incident. The nominated Contracted Provider Representative will receive all correspondence related to this Notifiable Incident. Note: this does not have to be the same person reporting the Notifiable Incident.

8	**Contracted Provider's Representative contact email**	Enter the contact email for the Contracted Provider's Representative identified in #7.
9	**Contracted Provider's Representative contact phone**	Enter the contact phone number for the Contracted Provider's Representative identified in #7.
Details of the Notifiable Incident		
10	**Are you reporting:**	Select one from the drop down box: • A death • An event that resulted in harm • A near miss (harm that was *nearly* caused)
11	**What level of harm was, or could have been, caused?**	Select one from the drop down box: • Death • Serious harm • Moderate harm • Minor or no harm Provide an indication of the harm that was, or could have been, caused. There are no definitions for serious, moderate or minor harm, so clinical judgement is required. WAPHA will independently allocate a Severity Assessment Code for internal processes and reporting purposes.
12	**Date of the Notifiable Incident**	Using the calendar, enter the date that the Notifiable Incident occurred.
13	**Has the patient, family or carer been contacted?**	Respond Yes, No or Not Applicable regarding whether you, or an appropriate representative, have been in contact with the patient, their family or their carer following the incident. WAPHA supports open disclosure regarding incidents that result in harm to a patient while receiving health care with the patient, their family, carers and other support persons. This should always be done with in line with patient privacy and confidentiality. More information is available in the Australian Open Disclosure Framework.
14	**Please describe the incident.**	Using the free text box, enter a description of the incident including: • Who was involved – do not use identifying information (no names). For staff members, consider using job titles.

		• Relevant contextual information, such as date the patient was referred into the service. • The time and place the incident occurred. • The location (address and location within service) • A description of the facts of what happened. Please do not guess or assume. • The nature and extent of harm or injury caused. • Factors that may have contributed to the incident (ie human error, unsafe work environment, incorrect or incomplete clinical documentation). Please do not provide identifying information, such as names and date of birth. Including identifying information for patients or other individuals involved may constitute a data breach.
15	**Attachment (optional)**	Please attach any relevant documentation. Please do not provide identifying information, such as names and date of birth. Including identifying information for patients or other individuals involved may constitute a data breach.
16	**Is the Contracted Provider required to report to any other organisations?**	Some organisations have obligations to report Notifiable Incidents to other bodies. If this is the case for your organisation, please provide details in the free text box. Note: An organisation that receives funding from multiple sources may have varying reporting obligations. It is your organisations responsibility to ensure this reporting is done in accordance with the relevant contracts.
17	**What action has been, or will be, taken to investigate, manage or review the incident?**	Using the free text field, please outline any action that has been, or will be, taken. This may include: • communicating with the patient and/or their family • arranging or providing follow-up care • conducting internal investigations or a root cause analysis • reporting the incident to other organisations (if required). It is up to your organisation to ensure that the Notifiable Incident is managed in accordance with relevant policies and procedures. Where a formal review is undertaken, WAPHA may request a copy of the report.

Attachment B

An incident investigation aims to understand why and how an incident occurred, and to identify ways to prevent a recurrence. The following resources may be of use to Contracted Providers undertaking an incident investigation, such as a Root Cause Analysis or Systems Analysis, following a Notifiable Incident. These are provided for information only and there is no obligation for Contracted Providers to utilise the resources below. Contracted Providers are expected to manage and respond to the Notifiable Incident in accordance with their organisation's relevant policies and procedures.

- Australian Commission on Safety and Quality in Health Care *National Safety and Quality Health Service Standards*: https://www.safetyandquality.gov.au/standards/nsqhs-standards
- WA Department of Health Clinical Risk Management resources: https://ww2.health.wa.gov.au/Articles/A_E/Clinical-risk-management
- NSW Clinical Excellence Commission*
    - Root Cause Analysis https://www.cec.health.nsw.gov.au/Review-incidents/root-cause-analysis
    - Toolkits https://www.cec.health.nsw.gov.au/Review-incidents/Upcoming-changes-to-incident-management/toolkits
- Queensland Government *Best practice guide to clinical incident management**: https://clinicalexcellence.qld.gov.au/sites/default/files/2018-01/clinicalincidentguide.pdf
- Imperial College London *Systems Analysis of Clinical Incidents: The London Protocol** https://www.imperial.ac.uk/patient-safety-translational-research-centre/education/training-materials-for-use-in-research-and-clinical-practice/the-london-protocol/

*Note: May include references to legislation that is not applicable to WA.