

27 October 2020

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Dear Ms Hopkins,

## **RQIA Review of Serious Adverse Incident Processes in Northern Ireland**

Thank you for inviting us to contribute to your Review of the Serious Adverse Incident (SAI) Process in Northern Ireland (NI).

We have provided a brief response below, following the template provided. However, it may be useful to first outline the role of the GMC. We are an independent organisation that helps to protect patients and improve medical education and practice across the UK.

- We decide which doctors are qualified to work here and we oversee UK medical education and training.
- We set the standards that doctors need to follow, and make sure that they continue to meet these standards throughout their careers.
- We take action to prevent a doctor from putting the safety of patients, or the public's confidence in doctors, at risk.

Every patient should receive a high standard of care. Our role is to help achieve that by working closely with doctors, their employers and patients, to make sure that the trust patients have in their doctors is fully justified.

## **Please outline any views or opinions you have in relation to the SAI process currently used by the health and social care organisations**

The GMC support an SIA process which focuses on protecting patients and enabling safe care by learning. Every SAI review/investigation should consider the whole system as well as any individual's role and be handled consistently, fairly, at the right time, right place and at the appropriate level.

Organisations must take responsibility for ensuring that those who are involved in the SAIs make fair and unbiased decisions, are representative of the local system and that patterns of decision making are monitored and scrutinised.

## **Please outline any changes or improvements that you think could be made to the SAI process.**

Perhaps most importantly, the system needs to inspire confidence in those who both work within and use it. They need assurance that their voices are heard and acted upon, to ensure lessons are learned from SAIs.

Our [independent report on gross negligence manslaughter and culpable homicide](#), published in 2019, found that improvements in patient safety are most likely to come through local investigations into patient safety incidents which are focused on learning, not blame. We strongly endorse an approach to SAIs that emphasises the need for the investigation team to have the time and the appropriate experience, skills and competence (including understanding of human factors) to undertake investigations, and the necessary degree of externality to command confidence in the process.

It is also important that SAI processes take into account the context in which individuals work – with particular consideration given to the systemic factors that shape this – including local cultures and the extent to which they promote fair treatment, effective induction, feedback and ongoing support for all doctors, particularly those at greater risk of isolation (as set out in our [Fair to Refer report](#)).

Employers should also establish a protocol to record early termination of bank/locum contracts by healthcare providers and share any key information or learning with locum agencies and Responsible Officers, as set out in our Fair to Refer report, 2019.

SAI processes can be extremely stressful for both the staff and families involved. This can be compounded by factors such as being excluded from the process, not receiving information about the process that is being followed and not having advice about their rights. We stress the need to involve and support families and staff as much as possible.

Based on our experience and expertise we have published our Good Investigation Principles, which can be found [here](#). These are the key principles that we believe should underpin investigations into concerns about fitness to practise. These

principles have wider applicability and may be useful for organisations during the SAI process.

Effective oversight and monitoring of how SAI processes are utilised, and how lessons learned are implemented, is also vital.

Yours sincerely,

A handwritten signature in cursive script that reads "J Kennedy". The signature is written in black ink on a light-colored background.

Jane Kennedy  
National Head - GMC Northern Ireland