To consider

**Significant Event Review Guidance**

**Issue**

1. The Significant Event Review Guidance was last reviewed in January 2012. It is now timely to update this to ensure it continues to reflect good practice in how we identify and carry out event reviews.

**Recommendation**

2. The Strategy and Policy Board is asked to endorse the refreshed Significant Event Review Guidance.
Significant Event Review Guidance

Issue

3 When a significant event occurs, we take the opportunity to review it and the circumstances which led to the event happening. This helps to identify if there is anything we need to do differently either with regard to the event itself or for future prevention. Where relevant, it also ensures that we are able to manage external communication and minimise any potential reputational impact.

4 It is important that Significant Event Reviews (SERs) are carried out in an open and transparent way and are seen as an opportunity to learn from mistakes rather than to attribute blame.

5 The current Guidance is now several years old and therefore it is timely to review and update it. The circulation and promotion of the refreshed guidance also provides an opportunity to remind staff of the importance of SERs in line with our corporate values, and how they contribute to continuous performance improvement and learning.

6 The draft Guidance has been shared with the Assistant Director – Office of the Chair and Chief Executive, business champions and a sample of staff who have been involved in preparing SERs in the past and reflects their comments and input.

7 The Guidance will be published on the intranet. The Assistant Director of Audit and Risk Assurance is also available to provide support to those undertaking an SER, and is also responsible for maintaining a corporate log of all SERs and reporting to the Charity Commission where appropriate.
Supporting information

How this issue relates to the corporate strategy and business plan

Carrying out significant event reviews when things go wrong is a key part of learning and improving business performance. It is in line with our values which underpin delivery of the Corporate Strategy. This Guidance contributes to the values in the following way:

a  Excellence – commitment to performance improvement to achieve excellence in everything we do.

b  Fairness – treating staff fairly and not attributing blame.

c  Transparency – being honest, open and transparent when things go wrong so that we can put things right and learn for the future.

d  Collaboration – using SERs to listen and learn about what has contributed to something going wrong and sharing them with directors and business champions to spread the learning across the organisation.

If you have any questions about this paper please contact: Lindsey Mallors, interim Assistant Director of Audit and Risk Assurance, lmallors@gmc-uk.org, 0207 189 5188.
Significant Event Review Guidance

What is a significant event?

1. No matter how well we manage and control our activities, sometimes things go wrong. When they do, it provides us with the opportunity for lessons to be learned and improvements to be made in the way we work.

2. A significant event is something that happens which could have a significant negative effect for the GMC, either compromising delivery of a key business function or in reputational terms.

3. To focus on an open and transparent approach to learning from mistakes a significant event review (SER) seeks to determine why something has gone wrong rather than to attribute blame.

How do I decide if a significant event has happened?

4. You should discuss what has gone wrong with your line manager and determine any appropriate actions to handle the event. In some cases, this may lead to the need for a more formal review and would be called a significant event review.

5. A significant event is likely to have some or all of the following characteristics:

   a. The event was unforeseen, requiring an unplanned response or action to put it right.

   b. There was actual or potential risk to patient safety.

   c. There was significant disruption to our business.

   d. There was a significant cost in money, time or opportunity.

   e. There was real or potential embarrassment or negative publicity.
What does a significant event review do?

6 The purpose of a significant event review is to:

- Review the lead up to the event to find what caused it to happen.
- Assess the effect and consequences to the GMC.
- Identify and agree actions to resolve any issues arising from the event.
- Identify opportunities to improve relevant policies, processes and procedures.

When should an SER be done?

7 A review should be carried out as soon as possible after the event has occurred, while the issues are fresh in everyone’s mind.

What process should be followed?

8 The SER process has 4 clear steps.

Step 1- Commission the SER

9 Once the need for an SER has been identified and agreed with the appropriate line manager for the area under review, a director, the Chief Operating Officer or the Chief Executive should commission the review. A named director must be responsible for completing the SER. They should oversee the review, providing input and appropriate challenge to ensure the review is conducted effectively and in a timely way.

10 The named director should select a named individual to carry out the review and prepare a report. This is likely to be a head of section or above but in selecting a named individual the following should be considered:

- Is the individual independent of the area to be reviewed? (Good practice would be to ask a named reviewer from a different directorate to the one where the review is taking place but this may not always be appropriate depending on the nature of the event.)

- Does the individual have sufficient general knowledge of the GMC’s business and of the area to be reviewed?

- Will the individual be credible, ie will the area under review recognise the individual’s credentials to carry out the review and liaise with senior staff on findings?

- Does the individual have appropriate skills for the work involved, for example, critical analysis skills, ability to interview staff effectively and sensitively?
11 The named reviewer must:

a Tell the Strategy and Communications Director promptly about the event, if they have not already been informed, and any communication requirements that may be needed.

b Tell the Assistant Director (AD) Audit and Risk Assurance of the event, the title of the SER and the estimated time it will take to complete the review and prepare the report.

12 Unless there are exceptional circumstances, this would be expected to be within a 4 week time frame. The AD Audit and Risk Assurance can provide support and guidance on the SER process if required.

Step 2 - Conduct the review

13 The reviewer must carry out the review as efficiently as possible, gathering the necessary information to help them understand the circumstances which led to the event happening. This may include meeting members of staff. If so, the named individual should explain the SER process, and the reason for wanting to involve a particular team member. The review must identify the actions which need to be taken to learn for the future and consider whether guidance and policies need to be updated.

14 The reviewer should draft a report using the template at Annex B.

15 If the review takes longer than anticipated, the reviewer should discuss this with the director and keep the AD Audit and Risk Assurance up to date with the agreed revised timeframes.

Step 3 - Prepare and consult on the draft report

16 After preparing a draft report the reviewer should ensure that any actions proposed have been agreed with a named action owner and the action owner’s line manager. In consultation with the named director, it may be appropriate to consider a peer review of the report for general appropriateness of findings, conclusions drawn and reasonableness of any actions proposed.

17 The named reviewer should then consult with other senior staff in the area under review and the Director of Strategy and Communication if external messaging may be required.

18 Finally, the draft report should be sent to the AD Audit and Risk Assurance for quality review and to provide assurance that:

a The review has been sufficiently robust and is appropriately documented.
b The action plan is realistic, addresses the issues and control weaknesses identified and will deliver the necessary improvements.

c Responsibility for implementation of the actions has been allocated and accepted.

19 The AD Audit and Risk Assurance will also review the SER to determine whether the event requires reporting to the Charity Commission in line with their trustee guidance on reporting serious incidents.

20 After this consultation the draft report should be passed to the named director for final review and approval and then to the AD Audit and Risk Assurance to arrange for Chief Operating Officer approval.

Step 4 - Share the lessons learned

21 After Chief Operating Officer approval, the AD Audit and Risk Assurance will circulate the report to the Senior Management Team and reviewer to share any learning across the organisation. They will also prepare a summary for the Performance Review Report and a synopsis for the Audit and Risk Committee. Agreed actions will be monitored through the action owners with progress on implementation and overdue actions reported to the Performance and Resources Board through the Performance Review Report.

22 The lead reviewer must provide the report to those individuals responsible for implementing any agreed actions and their line managers. They must agree the timing of updates to implementation of actions and notify relevant directorate senior management and the AD Audit and Risk Assurance of the agreed timeframes. The relevant director must then take responsibility for monitoring action implementation progress through directorate internal reporting. Progress updates should also be provided to the AD Audit and Risk Assurance.

23 The AD Audit and Risk Assurance will provide an update on implementation of actions arising from SERs to the Audit and Risk Committee for inclusion in the Committee’s annual report to Council.

Further information or advice

24 Please refer to the SER Flow Diagram in Annex A and report template in Annex B.

25 For further advice or information on conducting SERs, please contact the Assistant Director Audit and Risk Assurance on Ext 5188 or lmallors@gmc-uk.org.
Annex A

SER Process Flow Chart

Step 1
Commission SER

Step 2
Conduct review

Step 3
Draft SER Report
Discuss with
- named action owners
- senior staff in review area
- Director of S&C
- AD, A&RA

- Send to AD, A&RA for QA
- Send final draft to named director for approval
- Send to AD, A&RA to secure COO approval

Step 4
Circulate approved SER to lead reviewer

Circulate to action owners and directorate senior management

Circulate approved SER to directors

Cascade to share learning

Monitor action implementation

Report to PRB

Report synopsis of SER to ARC
Annex B

Preparing an SER report

1. The standard template for preparing an SER report is provided below, along with guidance on what to include in each section. The report should:

   a. Outline events chronologically.

   b. Be factually based.

   c. Contain the appropriate evidence for the conclusions reached.

   d. Draw clear and concise conclusions.

   e. Contain an action plan which clearly addresses any weaknesses identified.

   f. Refer to any individuals by their job title only, so that the report is understandable if staff change roles or leave the organisation.

   g. Use initials where it is not possible to refer to an individual by job title – for example, because they are not a member of staff

   h. Commit to agreed timeframes for implementation.

   i. Be written in line with our style and tone of voice communications.
SER Report Template

Commissioned by: Reference number:
Named director: Draft report date:
Named Reviewer: Issue Date:

Title of review:

Issue
1 Provide a brief description of the issue.

Background
2 Include brief background information to provide context to the significant event.

Summary of the Event
3 Provide an overview of what actually happened, including any relevant dates.

History
4 State the extent to which this event or anything similar has happened before.

Effect
5 State the nature and magnitude of any actual or potential implication arising from the event, e.g. an estimate of cost, the extent of actual or potential negative publicity, or any special exercise to review other cases.

Communication requirements
6 Indicate any internal or external communication needed arising from the event.

Control weaknesses identified
7 State whether an existing or desired control is absent, or has not been complied with.
**Conclusion**

8 Indicate the extent to which the event was or was not avoidable.

9 Indicate any relevant observation or any significant matters highlighted in the process of conducting the SER, but which may not be directly related to the SER.

10 State briefly any action that has been taken, and give an indication of the extent to which further action is necessary.

**Action plan**

11 It is best to use a table to record the action plan. The action plan should consist of specific, measurable and realistic actions. Each action should be allocated to and agreed by a titled individual (e.g. AD, Head of Section) with support from their line manager, to be implemented within an agreed timescale.

12 Write action points as concisely as possible, preferably starting each with a directive word, e.g. implement, change, consult, provide etc.

13 Only recommend a further review where it is necessary and it could not have been done as part of the SER investigation.