



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

**Action Plan based on recommendations arising from the report of the HIQA investigation into the provision of services to Ms A by the Health Service Executive at University Hospital Galway in relation to her symptomatic breast disease, and the provision of Pathology and Symptomatic Breast Disease Services by the Executive at the Hospital**

<b>1.Prepared on Behalf of National Director NHO</b>	<b>10<sup>th</sup> October 2008</b>
<b>2.Approved by the Senior Management Team of the HSE</b>	<b>4<sup>th</sup> November 2008</b>
<b>3.Presented to Risk Committee of the HSE Board</b>	<b>5<sup>th</sup> November 2008</b>

Ref. Nr	Recommendations	Deliverables	Commencement date	Finish date	Lead Responsibility	References / links	Comments
1.	<p><b>The National Standards for Symptomatic Breast Disease Services (2007) should be applied to all centres providing Symptomatic Breast Disease Services Irrespective of whether they are in the public, private or voluntary sectors.</b></p> <p><b>Where the care of patients is shared across more than one facility or institution, arrangements must be in place to ensure effective governance, management and review.</b></p> <p><b>Regular multidisciplinary team meetings must be held (at least weekly) and in particular, clear leadership of care planning must be maintained.</b></p> <p><b>Implementation of these standards should be subject to a co-ordinated process of quality review.</b></p>	<p>1.1 Assure compliance by all designated centers funded or operated by the HSE to key performance indicators in relation to national breast standards through audits conducted in association with HIQA on 6 monthly basis.</p> <p>1.2 As 1.1 above. Wherein hospital-based follow-up care has been provided outside a designated centre, this care must meet national breast standards and will be the subject of audit of designated breast centre where initial treatment was provided (see comment).</p> <p>1.3 This is a standard of care defined in the National Quality Assurance Standards Symptomatic Breast Disease. Assurance of compliance at all centre's will be provided through ongoing audit in association with HIQA.</p> <p>1.4 See 1.1 above.</p>	July 09	Ongoing	<u>authority and accountability – see comments</u>	National Quality Assurance Standards Symptomatic Breast Disease	<p>Voluntary hospitals and private hospitals will not fall under the governance of the NCCP. NCCP will coordinate audits in HSE operated or funded hospitals and HIQA will receive audit results. Authority regarding any necessary development required consequent to audits to be determined when Heads of Agreement signed between NHO and NCCP.</p> <p>While initial treatment will be provided for women with breast cancer at a designated centre, subsequent pathway of care may see follow up provided at other hospital locations. The designated centre providing initial treatment will retain responsibility and assure the quality of follow-up care provided elsewhere. Care provided at private hospitals or in primary care cannot be assured by the NCCP.</p>
2.	<p><b>Where diagnostic services are provided by a third party facility (for example a HSE laboratory providing services for a private hospital), such an arrangement should be subject to a formal Service Level Agreement, or contract, which is effectively managed and regularly monitored to ensure appropriate governance and quality assurance of the service. The HSE and voluntary hospitals should undertake a review of all such arrangements to ensure appropriate service agreements and monitoring are in place.</b></p>	<p>2.1 Review existing arrangements for diagnostic services provision between public and private sector in hospitals operated or funded by the HSE.</p> <p>2.2 Convene a Working Group to examine review findings and to make recommendations regarding continuation of such services and the governance and quality assurance framework which should apply to them.</p> <p>2.3 Direction from NHO to hospitals regarding diagnostic services provision between the public and private sector in hospitals operated or funded by the HSE based on recommendations of Working Group.</p> <p>2.4 Audit compliance with this direction</p>	Sept 08	Oct 09	NHO – Ann Doherty		

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	Equally, private sector providers are strongly encouraged to review all relevant arrangements where care of their patients is shared between organisations.						Private hospitals do not fall under the governance of the HSE.
3.	UHG's experience in responding to this incident, including the process adopted for patient management, should be captured and used to inform the development and implementation of national guidelines for handling adverse incidents.	<p>3.1 Workshop to be held by SIMT with key staff from UCHG involved in responding to this incident to identify learning for future incidents.</p> <p>3.2 Incorporate this learning in the next iteration of SIMT policy and incident management policy, procedure and guideline.</p>	<p>Nov 08</p> <p><i>In line with document control</i></p>	Nov 08	SIMT – Anne Carrigy		The HSE acknowledges HIQA's recognition of the good handling of this incident, in particular the handling of patients and families affected, by UHG and will share this across the organisation.
4.	<p>Units using breast Fine Needle Aspiration (FNA) as a diagnostic modality should do so only in an appropriate triple assessment context and with robust quality assurance.</p> <p><b>This should include:</b></p> <ul style="list-style-type: none"> <li>▪ <i>Clarifying the role of FNA cytology in the investigation of breast disease and applying agreed patient selection criteria</i></li> <li>▪ <i>Auditing the service against the minimum standards set by the United Kingdom NHS Breast Screening Programme (BSP). Audit should calculate sensitivity, specificity, positive predictive value of C5, false negative rate, false positive rate, inadequate rate, inadequate rate from cancers and suspicious rates</i></li> <li>▪ <i>Using the C1-C5 classification system to ensure reports are clear and unambiguous</i></li> </ul>	<p>4.1 Review current role of FNA in assessment of women with symptomatic breast disease including patient selection criteria and reporting of results</p> <p>4.2 Prioritise laboratory accreditation where FNA is provided by benchmarking against UK standards.</p>	<p>Nov 2008</p> <p>Jan 2009</p>	<p>Dec 2008</p> <p>June 2009</p>	NCCP – Professor Tom Keane	National Quality Assurance Standards Symptomatic Breast Disease	The deliverables for this recommendation cross refers with work being undertaken by the HSE to support the implementation of recommendations arising from the report on the 1 <sup>st</sup> HIQA investigation.
5.	A clearer direction is needed for the development and quality assurance of the diagnostic cytology service in UHG Pathology Department.	5.1 Diagnostic cytology services at UCHG to secure INAB accreditation	<p>Has commenced</p> <p>Has commenced</p>	<p>Dec 08</p> <p>Nov 08</p>	NHO – Ann Doherty		There has been a national decision to cease processing of new cervical screening cytology in all laboratories at hospitals funded or operated by the HSE. No new samples will be accepted after October 2008 and laboratories will continue processing of historic backlog to completion. The Service is now governed by the National Cancer Screening Service.
6.	<p>All pathology departments should implement the recommendations of the Faculty of Pathology's guidelines on histopathology quality assurance programmes in pathology laboratories. This incorporates, among other things:</p> <ul style="list-style-type: none"> <li>▪ <i>Intra-departmental consultation/peer review</i></li> <li>▪ <i>Multidisciplinary case discussion</i></li> <li>▪ <i>Incident reporting</i></li> <li>▪ <i>Vertical case review/audit</i></li> <li>▪ <i>Cytology quality assurance</i></li> </ul>	6.1 The NHO and NCCP will facilitate the implementation of the Faculty of Pathology's guidelines on histopathology quality assurance Programmes in pathology laboratories in hospitals operated or funded by the HSE through a series of workshops	Jan 09	March 09	NHO - Ann Doherty	Faculty of Pathology's guidelines on histopathology quality assurance programmes in pathology laboratories	An information day was held in July 2008. The NCCP has provided the Faculty of Pathology with funding for 1 year to appoint a person (0.5 whole time equivalent) to support the Faculty's guidelines who will facilitate workshops.

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	<b>Implementation of these recommendations must be supported by appropriate Information Technology systems.</b>	<p>6.2 Direction from NHO to all hospitals to implement these guidelines in pathology laboratories in hospitals operated or funded by HSE.</p> <p>6.3 Audit implementation of Faculty of Pathology's guidelines on histopathology quality assurance programmes in pathology laboratories</p> <p>6.4 Establish a Working Group to examine strategic development of ICT to support histopathology laboratory quality assurance and to make recommendations for service planning.</p>	April 09	April 09			<p>Laboratories in hospitals operated or funded by the HSE will be expected to produce and implement quality improvement plans necessary to effectively implement the faculty's guidelines.</p> <p>Among wide stakeholder engagement for this work, the HSE will welcome input from HIQA's Health Information Function.</p>
7.	<b>The HSE should review workforce planning at national and local levels to ensure that recruitment of consultants is more responsive to changing service needs and reliance on temporary staff is minimised. This should include measures to reduce the time-lag between authorisation to appoint and staff taking up post.</b>	<p>7.1 Finalise and publish workforce planning strategy for the HSE</p> <p>7.2 Align workforce planning with service and financial planning in annual service plan</p> <p>7.3 Develop and implement a monitoring system to ensure approved vacant consultant posts are advertised and filled in a timely manner</p> <p>7.4 Undertake audit of monitoring system</p>	Has commenced	Jan 09	HR - Martin McDonald &		<p>Workforce planning strategy for the HSE is being prepared in conjunction with the Department of Health and Children.</p> <p>Timelines reflect the need to coordinate this with next annual service plan cycle.</p>
8.	<b>It is recommended that the HSE Risk Sub-Committee progress and publish their work on mitigating risks associated with the employment of permanent and locum consultant staff. In the meantime, all local service providers should review recruitment policies and procedures to ensure robust verification and assessment processes are in place.</b>	<p>8.1 Finalise, publish and implement "end to end" procedural instructions booklet for all employers to mitigate risks associated with recruitment.</p> <p>8.2 Audit compliance with procedural instructions booklet.</p>	Has commenced	Dec 08	HR - Martin McDonald & Quality		<p>Given the risks to patient safety associated with this issue identified prior to the publication of the report on the HIQA investigation, the Risk Sub-Committee of the HSE Board is overseeing this work which is being undertaken by the HR Directorate of the Executive.</p>
9.	<b>A formal policy for the recruitment of locum and temporary consultant staff should be established and implemented nationally to ensure more robust and effective arrangements and quality assurance mechanisms. This should include:</b> <ul style="list-style-type: none"> <li>▪ <i>Formalised agreements with specialist recruitment agencies which will include; their role, responsibility and area of accountability in the recruitment process. These agreements should be regularly monitored</i></li> <li>▪ <i>The provision for appointment</i></li> </ul>	<p>9.1 See 8.1</p> <p>9.2 Initiate and complete the procurement of a national contract for the provision of locum consultants.</p> <p>9.3 Procedural instructions booklet to issue to all employers to ensure that applicants are considered on the basis of abilities, qualifications and suitability for the post in question.</p>	Has commenced	Dec 08	HR - Martin McDonald		<p>Cross reference deliverables for recommendation 8.</p>

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	<p><i>panels to view and discuss all written references as part of the assessment process and before recommendation for appointment</i></p> <ul style="list-style-type: none"> <li>▪ <i>Account to be taken of existing competency levels of applicants as well as arrangements for their ongoing development and support as temporary employees</i></li> <li>▪ <i>An agreed programme of audit against compliance</i></li> </ul>	9.4 Regular audit of locum and temporary consultant recruitment and selection process to be carried out in line with the HSE's recruitment licence.	Has commenced	in place			
10.	<b>The recommendations of the Lynott Report (2002) should be implemented by the HSE and other service providers and compliance should be audited regularly.</b>	<p>10.1 Deliverable 8.1 addresses the recommendations of the Lynott Report relevant to the HSE</p> <p>10.2 Engage with Irish Medical Council in relation to appropriate systems</p>	<p>Has commenced</p> <p>Has commenced</p>	<p>Dec 08</p> <p>ongoing liaison</p>	HR - Martin McDonald		<p>Cross reference deliverables for recommendations 8 and 9 above</p> <p>The recommendations of the Lynott Report predated the passing of the Medical Practitioners Act, 2007:- Section 84 (1) provides for notification to the HSE and employers of measures taken by the Irish Medical Council (IMC) in respect of registered medical practitioners- Section 82 (2) provides for notification to the HSE and employers of measures taken in relation to registered medical practitioners under the law of a state other than the State- Section 84 (4) provides that the IMC- in relation to a measure taken in relation to a registered medical practitioner - can notify a body in another jurisdiction where it believes that the practitioner to be registered</p>
11.	<b>The role of independent advocacy services should be developed in all hospitals. These advocacy services should facilitate patients coming forward to raise concerns and have them addressed. Hospitals should encourage such services as part of a helpline and/or as part of patients' hospital attendance.</b>	<p>11.1 Support, facilitate and engage with independent advocacy groups.</p> <p>11.2 A hospital appointed patient liaison person (at a senior level) identified as part of the complaints structure.</p>	<p>Has commenced</p> <p>Oct 08</p>	<p>Ongoing</p> <p>Dec 08</p>	Consumer Affairs – Mary Culliton		<p>The HSE supports, facilitates and engages with a number of independent advocacy groups in the area of breast disease and in other areas. This is an element of the implementation of the National Strategy for Service User Involvement in the Irish Health Service 2008-2013 and cross refers to actions arising from implementation of recommendations of the report on the First HIQA Investigation.</p> <p>The patient liaison person will be the principal point of contact with the patient and/or family and/or advocacy groups</p>
12.	<b>The corporate HSE executive management team should nominate a specific Director accountable for ensuring the development of an implementation plan for these recommendations. This should include a clear timeframe with milestones. Progress against the plan should be made public and reported to the Board of the HSE.</b>	<p>12.1 Nominate specific accountable Director for development of Implementation plan</p> <p>12.2 Develop an implementation plan for recommendations.</p> <p>12.3 Publish implementation</p>	<p>Aug 08</p> <p>Sept 08</p> <p>Nov 08</p>	<p>Aug 08</p> <p>Oct 08</p> <p>Nov 08</p>	NHO - Ann Doherty		