

# CLINICAL GOVERNANCE FRAMEWORK

July 2022

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# Purpose and Scope

Western Victoria Primary Health Network (PHN) is committed to ensuring the safe, high quality, effective healthcare for all consumers who engage in the delivery of our healthcare programs and services.

The purpose of this Framework is to ensure an understanding and accountability for clinical governance is available for all programs and services delivered and/or commissioned through Western Victoria PHN.

The scope of the Framework applies to Western Victoria PHN delivered services, commissioned services, and the initiatives that support and develop primary care.

# Overview

The National Model Clinical Governance Framework developed by the Australian Commission for Safety and Quality in Healthcare<sup>1</sup> describes five components of the Clinical Governance Framework.



**Governance, leadership and culture** – integrated corporate and clinical governance systems are established, and used to improve the safety and quality of health care for patients



**Patient safety and quality improvement systems** – safety and quality systems are integrated with governance processes to actively manage and improve the safety and quality of health care for patients



**Clinical performance and effectiveness** – the workforce has the right qualifications, skills and supervision to provide safe, high-quality health care to patients



**Safe environment for the delivery of care** – the environment promotes safe and high-quality health care for patients



**Partnering with consumers** – systems are designed and used to support patients, carers, families and consumers to be partners in healthcare planning, design, measurement and evaluation; =

The Clinical Governance Framework defines systems, structures, and processes that enable various organisational and personal accountability for the delivery of high quality, safe care including:

- Services provided, procured, and commissioned by Western Victoria PHN to be safe, effective, appropriate, consumer focussed, accessible and efficient.

<sup>1</sup> Australian Council on Health Care Standards. National Safety and Quality Health Service (NSQHS) Standards, available at: [www.nationalstandards.safetyandquality.gov.au/1.-clinical-governance](http://www.nationalstandards.safetyandquality.gov.au/1.-clinical-governance)

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- Clear and effective systems and processes through which clinical governance is defined, communicated, and maintained to ensure capability is evident within our delivered and commissioned services.
- WVPHN's integrity in delivering and commissioning clinical services is maintained as a high standard.

The Framework drives behaviour, both individual and organisational, that leads to better consumer care. This includes principles that underpin high standards of clinical performance, clinical risk management, clinical audit, and ongoing professional development to ensure that well developed processes to act upon and manage adverse events are in place.

The Framework is underpinned by a committed leadership that facilitates a learning environment focused on creating safe, effective, and responsive services. It ensures the Board, Executive, Managers, service providers, and healthcare providers understand their role and responsibility for the safety and quality of care they commission or provide. It builds on a 'just' culture that supports reporting and continuous quality improvement with all clinical services.

Working in partnership with consumers is central to ensuring their experience in identifying safety and quality issues, and solutions to design and delivery, is incorporated into all services.<sup>2</sup>

## Policy Statement

Western Victoria PHN is committed to improving health for the people in our community through the delivery of high quality, accessible, and integrated care that meets the needs of our community, underpinned by a system of robust clinical governance.

Western Victoria PHN's (Primary Health Network's) strategic vision, mission and values are central in driving the delivery of high-quality healthcare in our region that supports people to receive the right care at the right time in the right place.

Western Victoria PHN's Board, Executive, Managers, Staff and Commissioned Service Providers are required to understand the Western Victoria PHN (Western Victorian Primary Health Network) Commissioned Services and Clinical Governance Framework and to demonstrate accountability for the delivery of safe, high-quality care against legislative and regulatory requirements, within their service domain. As commissioners of health services, Western Victoria PHN has an obligation to prevent clinical care, or an absence of care, which could be reasonably foreseen to cause injury or harm to consumers. Anticipating risk and taking care to prevent consumers coming to harm is supported by articulating the requirements and monitoring the quality of healthcare processes and outcomes.

With respect to clinical governance for primary care, Western Victoria PHN has a role in supporting an environment that facilitates system improvement and workforce development to influence the uptake of quality improvement standards that deliver excellence in clinical care and safe transition of care across sectors.<sup>3</sup>

<sup>2</sup> Deeble Issues Brief No. 22: Clinical governance for Primary Health Networks, available at:

[www.ahha.asn.au/publication/health-policy-issue-briefs/deeble-issues-brief-no-22-clinical-governanceprimary-health](http://www.ahha.asn.au/publication/health-policy-issue-briefs/deeble-issues-brief-no-22-clinical-governanceprimary-health)

<sup>3</sup> Australian Government Department of Health, 2016. Primary Health Network Programme Guidelines, available at: [www.health.gov.au/internet/main/publishing.nsf/Content/PHN-Program\\_Guidelines](http://www.health.gov.au/internet/main/publishing.nsf/Content/PHN-Program_Guidelines)

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## Legislative Compliance

Legislative compliance incorporates relevant measures including nationally recognised quality standards, best practice guidelines and approaches to reporting and accountability processes. Legislative compliance will ensure that clinical services commissioned by Western Victorian PHN have defined expectations around the systems and processes for self-audit, quality improvement, capacity building and accountability processes.

Suppliers commissioned by Western Victorian PHN will be required to meet legislative compliance through contractual monitoring and reporting processes including annual provider credential audits.

Commissioned suppliers are required to comply with, but not limited to, the following legislation:

- Voluntary Assisted Dying Act 2017 (Vic), Voluntary Assisted Dying Regulations 2018 (Vic)
- Guardianship and Administration Act 2019 (Vic)
- Health Complaints Act 2016 (Vic)
- Health Complaints Regulations 2019 (Vic)
- National Health Act 1953 (Cth)
- Health Insurance Act 1973 (Cth)
- Health Insurance Regulations 2018 (Cth)
- National Health (Collaborative arrangements for nurse practitioners) Determination 2010 (Cth)
- National Health (Collaborative arrangements for midwives) Determination 2010 (Cth)
- National Health (Eligible midwives) Determination 2010 (Cth)
- Health Insurance Act 1973 (Cth)
- Health Insurance Regulations 2018 (Cth)
- Health Insurance Act 1973 (Cth)
- Health Insurance Regulations 2018 (Cth)
- Health Insurance Act 1973 (Cth)
- Health Insurance Regulations 2018 (Cth)

## Roles and Responsibilities

The Western Victoria PHN Board has responsibility for the governance of clinical care delivered and/or commissioned by Western Victoria PHN.

The Board of Directors has both the accountability and obligation for ensuring that the direct and commissioned services meet best practice and that matters of vicarious and reputational risk associated with commissioned services are addressed.

Good clinical governance is achieved by Western Victoria PHN when the organisation considers safety and quality implications in its decision-making processes as informed by key stakeholders including the Clinical and Community Advisory Councils.

This is reflected in the Western Victoria PHN Strategic Directions 2020 – 2023. Western Victoria PHN advocates for quality and improved health care, with local communities, service users, families, and carers at the centre of our thinking. Robust systems are in place for contracting, acquittal and data governance with strong privacy policies.

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## Primary Health Network

A summary of the role of Western Victoria PHN in clinical governance includes:

- Implementing effective needs assessment and planning processes to facilitate identification of health and service needs and the development of appropriate solutions.
- Providing effective guidance and designing service models and clinical projects that are informed by the evidence-base and in partnership with clinical experts and, as appropriate, service users and consumers, their families, and carers.
- Developing contractual content (including KPIs) that is consistent with the delivery of safe and high-quality clinical activities.
- Contract and performance management and monitoring.
- Ensuring the quality and safety of PHN-facilitated clinical activities.
- Ongoing monitoring to detect improvement priorities and opportunities for improved efficiency; and
- Strong partnerships with clinical experts, clinicians, consumers, and stakeholders to drive system reform.

## Board

The Board is responsible for setting the organisational strategy expectations for effective clinical governance and ensuring adequate resourcing.

The Board is responsible for:

- Establishing a Strategic Plan that incorporates clinical governance considerations and aspirations for the organisation.
- Setting the policy, performance, and reporting requirements for the organisation.
- Ensuring organisational compliance with the policy, performance, and reporting requirements.
- Ensuring organisational compliance with the applicable and relevant legislative and regulatory requirements.
- Ensuring an organisational culture that encourages safe and high-quality care.

## Clinical Council

Reporting to the Board of Directors, the Western Victoria PHN Clinical Council provides oversight of clinical governance systems across the organisation.

The Clinical Council's role in Clinical Governance is:

- To advise on decisions related to changes in clinical practice which impact on organisational governance.
- Ensure a commitment to quality improvement.
- Review any amendments of the Clinical Governance Framework document.

## Community Council

Reporting to the Board of Directors, the Western Victoria PHN Community Council provides advice to the Board on community engagement.

The Community Council's role in Clinical Governance is:

- Provide feedback to the Clinical Council, about the experiences of patients, health consumers, carers, and community members that have accessed health care programs and/or services.
- The Community Council has a role in implementation of Clinical Governance through meaningful engagement in decision-making about health policy and planning, care and treatment, and the wellbeing of the community.

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## CEO

The CEO is responsible for overseeing the implementation of the Western Victoria PHN Clinical Governance responsibilities, including:

- Actively communicate the commitment of the Board to a culture and the delivery of safe and high-quality care.
- Ensure the policy, strategy and framework established by the Board are effectively operationalised.
- Ensure the Board is provided with sufficient information to discharge its Clinical Governance responsibilities.
- Monitoring organisational compliance and performance.

## Executive Team

The WVPHN Executive Team is responsible for implementing the organisational strategy and maintaining effective Clinical Governance, including:

- Developing and maintaining policy and processes that provide coverage for the range of clinical activities commissioned or facilitated by Western Victoria PHN.
- Establishing systems that ensure compliance with the policy, performance and reporting requirements that includes management of variation and breach for the organisation.
- Utilising the Framework to design service requirements and specifications for clinical activities commissioned or facilitated by Western Victoria PHN.
- Identifying and operationalising activities that support improved provider and system performance.

## Program Managers and Teams

WVPHN staff members are responsible for adhering to and operationalising Clinical Governance requirements including:

- Compliance with organisational policy.
- Supporting commissioned provider adherence to performance and reporting requirements.
- Delivering initiatives that support improved provider and system performance.

## Commissioned Providers and Clinicians

Commissioned providers are wholly responsible for the delivery of safe and high-quality clinical activities. Commissioned providers are responsible for developing clinical governance systems that are compliant with national standards and legislation including (but not limited to):

- Maintaining appropriate and effective risk management frameworks, plans, and policies.
- Maintaining an appropriate and effective incident management plan and policies.
- Maintaining a complaints management policy.
- Undertaking trend analysis of all incidents and complaints and supplying the analysis to Western Victoria PHN, including resultant quality improvement activities, as part of the reporting cycle.
- Undertaking a joint root cause analysis (in collaboration with any other involved services) on all serious incidents and complaints and reporting the findings to Western Victoria PHN.
- Ensuring clinical environments are safe and accessible.

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## Consumers, Carers, and Community Members

Consumers, carers, and community members are involved in implementation through meaningful engagement with Western Victoria PHN including:

- Decision-making about planning, care and treatment of direct services and commissioned services, and the wellbeing of themselves and the community.
- Advocating about their own healthcare journey can contribute significantly towards quality improvements.<sup>4</sup>

## Reporting

### Procedure

The Western Victoria PHN Performance and Quality Committee has authorship to ensure systems and structures are in place to monitor quality of care, minimise risks and promote continuous improvement.

The Western Victoria PHN Performance and Quality Committee is responsible for the review, management and escalation of Clinical Complaints and incidents and will inform and make recommendations to the WVPHN Board via Finance, Audit and Risk Board sub-Committee.

### Clinical Incidents - Management

Western Victoria PHN reviews and monitors all incidents until they reach a satisfactory conclusion. Trends are tracked and reported to the commissioned organisations and WVPHN Finance, Audit and Risk sub-Committee of the Board.

The Clinical Incident Management Procedure – Internal provides a framework for Western Victoria PHN to process, monitor and manage the incidents, monitor outcomes, identify best practise and ensure that high quality and safe commissioned services are provided.

### Clinical Incidents - Analysis

It is expected that all sentinel events and incidents with an incident severity rating (ISR) of 1 or 2 will be subject to a Root Cause Analysis or in-depth investigation and review process. Once actions and recommendations are developed, and it is expected that outcomes are shared with Western Victoria PHN.

All reported incidents will be analysed to understand how and why the incident occurred and identifying factors to prevent a recurrence. Actions and recommendations are developed to prevent recurrence of incident in accordance with Clinical Incidents Reporting Procedures.

ISR 3 & 4 incident data related to Western Victoria PHN commissioned services will be reported by the Commissioned Providers as part of their annual audit reporting. The aim of the analysis is to ensure quality and safety improvement.

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<sup>4</sup> Australian Commission on Safety and Quality in Health Care (2011), Patient centred care: Improving quality and safety through partnerships with patients and consumers, ACSQHC, Sydney, available at: [www.safetyandquality.gov.au/our-work/patient-and-consumer-centred-care](http://www.safetyandquality.gov.au/our-work/patient-and-consumer-centred-care)

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## Complaints to Western Victoria PHN

WVPHN is committed to fairness, accessibility, responsibility, and efficiency in dealing with complaints. All complaints will be managed in an equitable, objective, and confidential manner.

WVPHN endeavours to respond to all complaints within a three business day timeframe and resolve complaints within a ten business day timeframe. Exceptions to these timeframes are allowed with permission from the relevant Executive Director, in consultation with the CEO.

## Complaints to Western Victoria PHN - Escalation

The purpose of this procedure is to provide guidance on the processes to be undertaken when an external party registers a concern, complaint or feedback about Western Victoria PHN or services commissioned by Western Victoria PHN, where the complaint is clinical in nature and requires escalation.

## Clinical Incidents - Service Providers

For commissioned services there is a mandatory requirement to escalate reportable incidents with an incident Severity Rating (ISR) 1 or 2 (see table below) to Western Victoria PHN as part of standard contractual arrangement. Incidents will be recorded in Western Victoria PHN Clinical Incident Management System (SysAid). This monitoring process fosters the safe delivery of commissioned services and examines the systems and processes in place to support a continuous improvement culture.

All contracted services are required to have a sound clinical risk management framework in place that is compliant with relevant legislation and Australian standards.

\*Incident Severity Rating (ISR) Table

ISR 1	Severe/death
ISR 2	Moderate
ISR 3	Mild
ISR 4	No harm/near miss

Source: Victorian Health Incident Management System (VHIMS)

## Feedback

Western Victoria PHN is committed to providing a timely response to feedback and complaints provided to the organisation and will manage feedback and complaints in an equitable, objective, and unbiased manner. All feedback and complaints are treated confidentially.

WVPHN welcomes feedback on the organisation, programs, and services to help with identifying and reviewing areas requiring improvement. Feedback can be provided several ways:

- Online: <https://westvicphn.com.au/> click *Contact Us* and complete the Contact form.
- Email: [info@westvicphn.com.au](mailto:info@westvicphn.com.au)
- Write a letter: 131 Myers Street, Geelong VIC 3220

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For commissioned services, there is a requirement to notify Western Victoria PHN of complaints received and report these via the systems detailed above, in order to meet contractual obligations.

Western Victoria PHN reviews and monitors all ISR 1 and ISR 2 incidents until they reach a satisfactory conclusion. This monitoring process fosters the safe delivery of commissioned services and examines the systems and processes in place to support a continuous improvement culture.

## Glossary

Term	Definition
<b>Clinical governance</b>	The system by which the governing body, managers, clinicians, and staff share responsibility and accountability for the quality of care, continuously improving, minimising risks, and fostering an environment of excellence in care for consumers/patients/residents.
<b>Clinician</b>	A healthcare provider, trained as a health professional, including registered and non-registered practitioners. Clinicians may provide care within a health or wellbeing organisation as an employee, a contractor, or a credentialed healthcare provider, or under other working arrangements.
<b>Consumer</b>	People who are current or potential users of health services, this includes children, women and men, people living with a disability, people from diverse cultural and religious experiences, socioeconomic status and social circumstances, sexual orientations, health, and illness conditions.
<b>Framework</b>	A set of principles and long-term goals that form the basis of making rules and guidelines, and to give overall direction to planning and development.
<b>Governance</b>	The set of relationships and responsibilities established by a health or wellbeing organisation between its executive, workforce and stakeholders (including patients and consumers). Governance incorporates the processes, customs, policy directives, laws, and conventions affecting the way an organisation is directed, administered, or controlled. Governance arrangements provide the structure for setting the corporate objectives (social, fiscal, legal, human resources) of the organisation and the means to achieve the objectives. They also specify the mechanisms for monitoring performance. Effective governance provides a clear statement of individual accountabilities within the organisation to help align the roles, interests, and actions of different participants in the organisation to achieve the organisation's objectives.
<b>Health care</b>	The prevention, treatment, and management of illness and injury, and the preservation of mental and physical wellbeing through the

<b>Term</b>	<b>Definition</b>
	services offered by clinicians, such as medical, nursing, and allied health professionals.
<b>Local communities</b>	The people living or working within the Western Victoria PHN region/catchment.
<b>Outcome</b>	The status of an individual, group of people or population that is wholly or partially attributable to an action, agent or circumstance.
<b>Patient</b>	A person who is receiving care in/from a health service organisation.
<b>Patient Safety</b>	Prevention of errors and adverse effects on patients associated with health care.
<b>Quality</b>	Doing the right things, for the right people, at the right time and doing them right the first time.
<b>Quality improvement</b>	The combined efforts of the workforce and others – including consumers, patients, and their families, researchers, planners and educators – to make changes that will lead to better consumer outcomes (health), better system performance (care), and better professional development. Quality improvement activities may be undertaken in sequence, intermittently or on a continual basis.
<b>Risk</b>	The chance of something happening that will have a negative impact. Risk is measured by the consequence of an event and its likelihood.
<b>Safety</b>	A state in which risk has been reduced to an acceptable level.
<b>System</b>	<p>The resources, policies, processes, and procedures that are organised, integrated, regulated and administered to accomplish a stated goal.</p> <p>A system:</p> <ul style="list-style-type: none"> <li>• Brings together risk management, governance and operational processes and procedures, including education, training and orientation</li> <li>• Deploys an active implementation plan; feedback mechanisms include agreed protocols and guidelines, decision support tools and other resource materials</li> <li>• Uses several incentives and sanctions to influence behaviours and encourage compliance with policy, protocol, regulation and procedures.</li> </ul> <p>The workforce is both a resource in the system and involved in all elements of systems development, implementation, monitoring, improvement and evaluation.</p>

## Templates

- Links must be included for all templates
- WVPHN Provider Clinical Governance Checklist

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# References

- WVPHN Risk Management Plan
- WVPHN Commissioning Framework
- WVPHN Strategic Directions
- Links must be included for all references

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