



# RCSI Open Disclosure Policy

RCSI DEVELOPING HEALTHCARE LEADERS WHO MAKE A DIFFERENCE WORLDWIDE

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## Contents

Introduction & Background.....	3
Purpose .....	3
Definitions and Scope.....	4
What is Open Disclosure? .....	4
The Principles of Open Disclosure.....	5
RCSI Open Disclosure Policy.....	5
Requirement 1 .....	5
Requirement 2 .....	6
Requirement 3 .....	6
Requirement 4 .....	6
Requirement 5 .....	6
Requirement 6 .....	7
Involvement in and Managing Open Disclosure incidents.....	7
Appendix 1: Useful links and additional information .....	8
Appendix 2: Section 5.4 of the National Open Disclosure Framework 2023 .....	9

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## Introduction & Background

The [National Open Disclosure Framework \(2023\)](#) is an initiative of the Department of Health (DOH). It aims to promote a clear and consistent approach by all health and social care service providers, and other organisations where appropriate, to open communication with patients, service users and any relevant support person, following a patient safety incident or an adverse event. The Framework is designed to provide overarching principles and a national, consistent approach to Open Disclosure in health and social care in Ireland.

The [HSE \(Health Service Executive\) Open Disclosure Policy: Communicating with Patients Following Patient Safety Incidents](#) (2019) ensures that patients who experience harm during their healthcare are communicated with in an open, honest and timely manner. Open Disclosure is considered a professional requirement anchored in healthcare professionalism, ethics and law, aiming to enhance trust between patients and healthcare providers<sup>1</sup>.

RCSI is fully committed to the principles of Open Disclosure and supports the relevant requirements outlined in the [National Framework](#) and the HSE Open Disclosure Policy.

## Purpose

RCSI understands that alignment with the relevant sections in the Framework and HSE policy positively reinforces RCS's own commitment to Open Disclosure for students, trainees, staff, and the patients encountered during their training and education. This Policy assists in fostering a culture of openness, honesty, compassion and transparency. This Policy addresses the requirements outlined in the National Framework including RCSI's roles and responsibilities in supporting students and trainees whilst on clinical placements. Under this Policy, Students should always consult the clinical sites own policy and procedures, and should not initiate an act of Open Disclosure at any point during their programme.

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<sup>1</sup> At time of drafting, the HSE policy is currently under review (late 2024)

## Definitions and Scope

The following definitions are used in relation to this policy:

<b>Students</b>	Any student registered to an award mapped to the NFQ and which includes an RCSI university organised mandatory patient facing period of experiential learning.
<b>Trainees</b>	Any trainee who is a post-graduation learner enrolled in an approved (HSE) training scheme operated by RCSI.
<b>Clinical or Practice Sites</b>	Any site providing mandatory patient facing clinical learning experiences for RCSI students and trainees.
<b>Relevant Staff</b>	Staff involved in teaching or supervising clinical and practical aspects of relevant programmes, as well as staff responsible for programme design and management, e.g. Practice Educators, Year Leads, Curriculum Directors, Heads of Schools, etc. This includes RCSI Honorary and Adjunct Appointees, as well as staff remunerated by RCSI.

This policy applies to:

- All RCSI Students and Trainees who spend time in mandatory clinical placements in Irish healthcare settings as part of their programme of study.
- All Relevant RCSI staff.

## What is Open Disclosure?

Open disclosure is defined by the Health Service Executive (HSE) as:

*‘an open, consistent, compassionate, and timely approach to communicating with patients and, where appropriate, their relevant person following patient safety incidents. It includes expressing regret for what has happened, keeping the patient informed, and providing reassurance in relation to on-going care and treatment, learning, and the steps being taken by the health services provider to try to prevent a recurrence of the incident’.<sup>2</sup>*

<sup>2</sup> Section 1.3 on page 7 of the HSE Open Disclosure Policy: Communicating with Patients Following Patient Safety Incidents

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## The Principles of Open Disclosure

The National Framework outlines a set of six principles developed by the Independent Patient Safety Council (IPSC)<sup>3</sup>.

In summary, the Principles are:

**Principle 1:** Open, Honest, Compassionate, and Timely Communication

**Principle 2:** Patient/Service User and Support Person's Entitlement in Open Disclosure

**Principle 3:** Supporting Health and Social Care Staff

**Principle 4:** Promoting a Culture of Open Disclosure

**Principle 5:** Open Disclosure for Improving Policy and Practice in Health and Social Care

**Principle 6:** Clinical and Corporate Governance for Open Disclosure

## RCSI Open Disclosure Policy

The requirements for Education Bodies (Undergraduate and Postgraduate Education and Training; and Clinical Practice and Placement), are set out in Section 5.4 of the National Framework (Appendix 2). The wording and language used in this RCSI Policy, and any associated actions, is consistent and aligned with those requirements.

The Policy is applicable to all parts of RCSI involved in education and training with mandatory clinical practical components in their programmes, including those not subject to review and accreditation by a Professional Registration Statutory Body (PRSB). The Policy contains six requirements and will be reviewed and updated as needed.

### Requirement 1

1. RCSI must include in all relevant undergraduate and postgraduate education and training programmes<sup>4</sup>, content that specifically focuses on open disclosure and addresses:
  - 1.1. Communication skills, and;

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<sup>3</sup> The details of these can be found at Chapter 3 of the [National Framework](#).

<sup>4</sup> Only programmes with mandatory clinical/practical components

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- 1.2. Patient safety incident(s), and;
  - 1.3. Adverse event management, and;
  - 1.4. Ensure that programmes adequately prepare graduates to understand and participate in open disclosure as part of their professional practice

### **Requirement 2**

2. RCSI should ensure that relevant graduates have undertaken training in relation to patient safety incidents and adverse events management as part of their education and training.

### **Requirement 3**

3. RCSI should ensure that relevant graduates understand:
  - 3.1. The legislative and policy frameworks underpinning open disclosure
  - 3.2. The associated legal protections afforded to them, and
  - 3.3. The legal responsibilities related to open disclosure.
  - 3.4. Graduates should be able to discuss the role of open disclosure in the provision of safe, patient and service user-centred, and effective health and social care services

### **Requirement 4**

4. RCSI must ensure that all training sites involved in the delivery and supervision of RCSI Students and Trainees engaged in undergraduate and postgraduate education and training have a policy in relation to open disclosure in place, which aligns with the principles of the Framework.

### **Requirement 5**

5. RCSI must ensure that all Relevant Staff responsible for the supervision of clinical education and training of RCSI Students and Trainees are aware of, and comply with, their responsibilities under the National Framework on Open Disclosure and HSE Open Disclosure Policy, or their equivalent institutional policy, and should ensure that all Students and Trainees on placement have an opportunity to learn more about open disclosure in practice.

### **Requirement 6**

6. RCSI must provide additional support to any Students or Trainees involved in open disclosure and patient safety incidents and adverse events during placement or internship. Students and Trainees will be supported through the relevant clinical sites reporting procedures.

### **Involvement in and Managing Open Disclosure incidents**

RCSI are fully committed to open, honest, compassionate and timely communication between individuals, institutions and organisations with whom we engage. If an RCSI Student or Trainee is involved in an incident or event, they should consult the site's policy in relation to managing the event. Support from appropriate RCSI staff during the process will be available.

## Appendix 1: Useful links and additional information

### Training on Open Disclosure

HSEland

<https://www.hseland.ie/dash/Account/Login>

Open Disclosure webinars:

<https://www2.healthservice.hse.ie/organisation/qps-incident-management/open-disclosure/webinars/>

National Healthcare Communication programme:

<https://www.hse.ie/eng/about/our-health-service/healthcare-communication/>

NHCP app (search for NHCP):

<https://play.google.com/store/apps/details?id=com.nhcp.app&hl=en IE&pli=1>

### RCSI Supports

RCSI Students can email RCSI Student Welfare [swo@rcsi.ie](mailto:swo@rcsi.ie)

### CoMPPAS Student Assistance Programme (CSAP)

CSAP is a confidential and independent counselling and specialist information service, which can be accessed 24 hours per day, 365 days per year. This service provides both phone-based support, information and access to up to six counselling sessions. CSAP offers an online wellbeing portal with information on mental and physical health, nutrition and meal planning, financial wellbeing and more.

Visit: <https://rcsi-sap.spectrum.life/login>

Access through a confidential, free phone telephone line, an online chat function through the platform or by requesting a call back.

**Freephone:** 1800 851 340

**WhatsApp:** Text 'Hi' to 087 369 0010

**INTL:** 00353 1 518 0277



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## Appendix 2: Section 5.4 of the National Open Disclosure Framework 2023

### 5.4 Education Bodies

#### Undergraduate and Postgraduate Education & Training

Education bodies involved in the delivery of undergraduate and postgraduate academic programmes with clinical/practical components to the health and social care professions must include communication skills with a specific focus on open disclosure in their programmes and ensure that the programmes adequately prepare graduates to understand and participate in open disclosure as part of their professional practice. Health and social care graduates should have undertaken training in relation to patient safety incidents and adverse events management as part of their education and training. Health and social care graduates should also understand the legislative and policy frameworks underpinning open disclosure, the associated legal protections afforded to them, and the legal responsibilities related to open disclosure. Health and social care graduates should be able to discuss the role of open disclosure in the provision of safe, patient and service user-centred, and effective health and social care services.

This applies to all **formal education and training programmes with clinical/practical components**, not just programmes that are subject to accreditation or approval and monitoring by a professional regulator.

#### Clinical and Practice Placements

Educational bodies must ensure that all training sites involved in the delivery and supervision of student clinical and practice placements have a policy in relation to open disclosure in place, which aligns with the principles of the Framework. All academic and clinical staff responsible for the clinical and practice education of health and social care staff and students, both in the educational body and clinical training sites, must have undertaken formal training in relation to open disclosure and should ensure that all students on placement have an opportunity to learn more about open disclosure in practice. Additional support must be provided to any students and/or trainees involved in open disclosure and patient safety incidents and adverse events during placement or internship.